

# Martlesham Parish Council

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12 February 2026

Dear Sir/Madam

## **SCC/0170/25SC A12 MRN IMPROVEMENT SCHEME**

### **FORMAL HOLDING OBJECTION**

Martlesham Parish Council hereby submits a **Holding Objection** to the above application. While the Council supports the principle of improving strategic transport infrastructure, we consider the submitted proposal insufficiently evidenced and potentially prejudicial to sound plan-making. Determination should therefore be deferred until the evidential gaps and mitigation requirements outlined below are fully addressed.

#### **1. Deficiencies in the Evidence Base: Outdated and Incomplete Traffic Modelling**

The Transport Assessment relies on traffic growth assumptions derived from the 2020 Local Plan evidence base. These inputs are now materially outdated and do not reflect the significant uplift in housing need arising from the current Standard Method figures, which indicate an approximate 87% increase in East Suffolk's annual housing requirement. This represents a substantial and unmodelled growth trajectory.

Furthermore, the modelling does not account for the outcomes of East Suffolk's recently concluded Call for Sites, which includes several large development clusters that would directly influence traffic flows along the A12 corridor. These omissions mean that key strategic growth areas—particularly along the A12 corridor—have not been assessed.

The National Planning Policy Framework (NPPF) requires planning decisions to be supported by “up-to-date, proportionate and robust” evidence, including realistic assessments of future development need. Reliance on superseded housing

assumptions fails to meet this requirement. Strategic infrastructure should be planned to accommodate anticipated future growth, not historic projections.

Unmodelled high-growth or corridor-focused development scenarios present the following material risks:

- Underestimation of future congestion, junction stress, and journey time unreliability.
- Potential overstatement of scheme benefits and value-for-money assessments.
- Failure to assess cumulative impacts, alongside those associated with Nationally Significant Infrastructure Projects that rely on the A12 during construction phases.
- Risk of locking in under-capacity infrastructure that cannot be readily mitigated once constructed.

Given these deficiencies, the Parish Council requests that Suffolk County Council obtain confirmation from the District Council on the current housing requirement as derived from the revised Standard Method, including whether it exceeds the adopted Local Plan figure and whether additional sites promoted through the recent Call for Sites increases development within the area. The applicant should then submit updated strategic and junction-level modelling, including sensitivity testing for high-growth and A12-corridor growth scenarios through to 2045.

Determination should not proceed until either (a) East Suffolk Council's emerging spatial strategy is clarified, or (b) a modelling addendum aligned with the revised housing trajectories is submitted. Approving the scheme in its current form would pre-empt plan-led development and undermine evidence-based decision-making.

Martlesham Parish Council has requested a Statement of Common Ground with East Suffolk Council to ensure the cumulative traffic implications of future growth east of Ipswich—and associated risks of rat-running and settlement coalescence—are properly considered. The A12 MRN scheme must be aligned with this process.

## **2. Traffic Calming, Road Safety, and Active Travel Concerns**

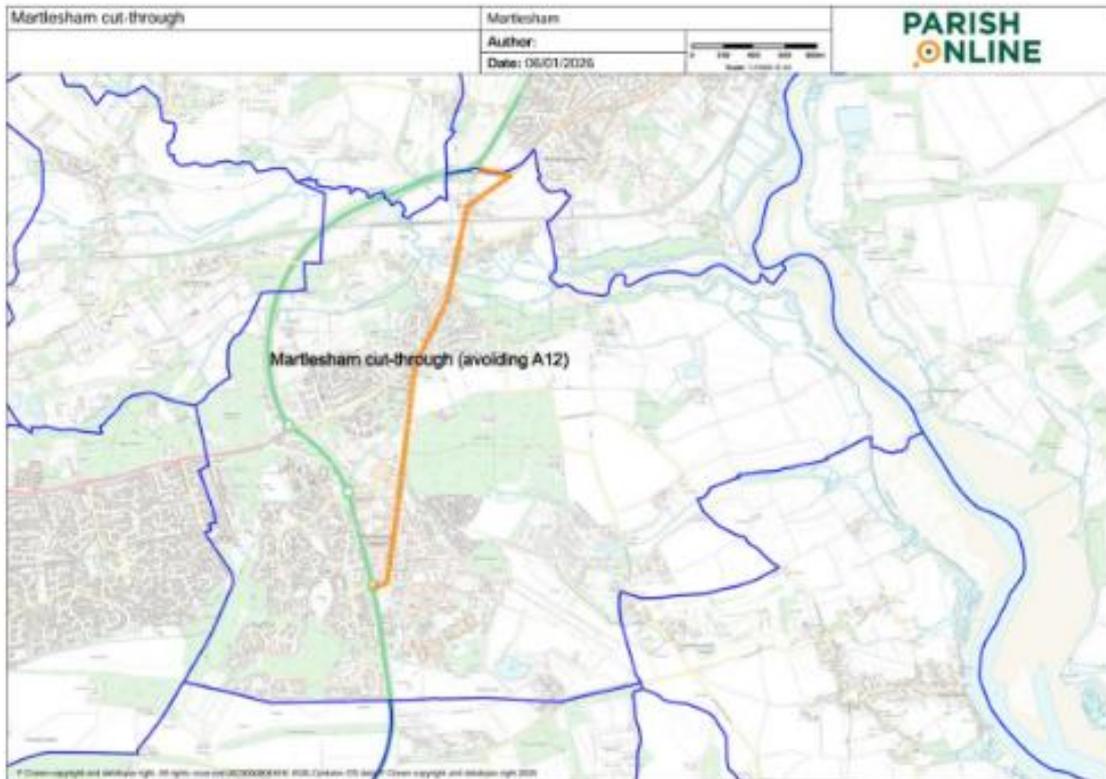


Figure 1 Map showing Martlesham cut-through route that is commonly used to avoid A12

While the scheme proposes some multimodal improvements, it fails to address known safety risks on Felixstowe Road, a priority active travel corridor and part of the National Cycle Network (NCN1). This route already experiences high volumes of through-traffic seeking to avoid A12 congestion, with community monitoring indicating daytime flows of 400–500 vehicles per hour. A recent Speed Volume and Classification survey of the Felixstowe Road by Suffolk Highways recorded a combined average daily traffic flow of 6,251 vehicles over a 24-hour period and an 85<sup>th</sup> Percentile speed of 34 mph, posing clear safety concerns for this route as an active transport corridor.

There is a credible risk of increased rat-running along Felixstowe Road due to the uncertainty surrounding future A12 performance, including construction-phase disruption. Without safeguards, this undermines the scheme’s multimodal objectives and compromises pedestrian and cyclist safety. NPPF para. 111 requires the protection of such routes.

In accordance with the precautionary principle and Policy MAR13 of the Martlesham Neighbourhood Plan, the Parish Council requests that a permanent modal filter be installed on Felixstowe Road to protect the integrity of the priority cycle route and prevent diversionary traffic.

Should the Council decline a permanent intervention, an Experimental Traffic Order imposing temporary restrictions for an initial 18-month period, commencing at the start of construction, is required as a minimum safeguard.

If the Authority is minded to approve the application, we request the following be secured through Grampian-style pre-commencement conditions:

- Delivery of the Main Road Active Travel Scheme prior to the commencement of A12 works; and
- Implementation of the Felixstowe Road modal filter (permanent or experimental).

We also request that Suffolk County Council re-consult Active Travel England on the scheme's displacement impacts. As the statutory consultee for active-travel safety, ATE's assessment should be used to confirm the scale of risk and to inform the detailed design of mitigation.

For the avoidance of doubt, this re-consultation is additional to, and not in place of, the Parish Council's request for a permanent modal filter. The filter remains the necessary and proportionate measure required to protect the priority cycle route in accordance with Policy MAR13 and NPPF paragraph 111.

### **3. Policy Conflict: Land Protected from Development (MAR2)**

The proposed Portal Avenue bus link and associated new junction will introduce new vehicle movements and infrastructure into an area currently used as a safe, traffic-free walking and cycling corridor. This creates unnecessary severance and reduces the perceived and actual safety for active-travel users and weakens the settlement-separation greenway that currently supports sustainable local movement. The scheme therefore conflicts not only with MAR2 of the Martlesham Neighbourhood Plan, which designates this corridor as an Area to be Protected from Development, but with wider policy requirements to enhance – rather than compromise- walking and cycling routes.

The resulting urbanisation would erode local character and weaken the designated green buffer, leading to avoidable landscape, amenity, and character harm, and further undermining compliance with the Neighbourhood Plan.

#### **Mitigation Requirements**

If the Authority is minded to approve the application, we request the following measures should be secured to offset these impacts,

##### **a) Guaranteed Bus Service Levels**

The existing hourly service to Martlesham Heath is insufficient to meet the scheme's stated aim of enhancing sustainable transport choices. The Parish Council requests

that East Suffolk Council utilises its £27m Local Authority Bus Grant (2026–2029) to secure:

- A minimum 30-minute frequency for service 66A; and
- Extended evening operating hours for this service.

These enhancements should be formalised through a Section 106 Agreement or binding Service Level Agreement.

#### **b). Bus Service Improvements**

In addition to improved frequency and evening hours, the Parish Council requests:

- A new direct bus link from Martlesham Heath to Martlesham Retail Park, as no such connection currently exists.
- Bus connections between Martlesham Heath and the new transport hub at Adastral park, to support onward travel.
- Travel incentives for the local community (e.g., discounted passes, vouchers, or promotional schemes) to encourage uptake of the improved services.

These measures should be secured through a Section 106 Agreement or Service Level Agreement.

#### **c) Environmental and Character Mitigation**

To minimise the urbanising effect of the new link:

- Densely planted acoustic earth bunding should be provided to protect residential amenity from A12 noise; and
- Low-spill, dark-sky compliant lighting should be installed to safeguard wildlife corridors and the semi-rural character of Martlesham Heath.

#### **d) Off-Site Walking and Cycling Improvements**

Compensatory improvements to the wider local walking and cycling network are essential to avoid a net reduction in active-travel quality. The Parish Council therefore requests targeted investment in nearby routes used by the affected community.

These measures should be secured via condition or legal agreement to ensure that the scheme delivers an active-travel network that remains safe, continuous, and attractive for residents.

### **Conclusion**

Martlesham Parish Council respectfully submit a **Holding Objection** to the A12 MRN Improvement Scheme. The proposal relies on outdated evidence, fails to assess foreseeable growth pressures, and conflicts with key Neighbourhood Plan policies.

Determination should be deferred until updated modelling, and a full suite of mitigation measures are provided.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Lisa Burgess', with a horizontal line extending to the right.

Lisa Burgess  
Clerk to Martlesham Parish Council