Waldringfield Parish Council response to the following Planning Application: (consultation period extended to 12/12/18)

DC18/4477/OUT Gorse Farm construction of 18 houses, access road, lake and perimeter woodland.

WPC **objects strongly** to this application and recommends that it is refused permission.

Much of this application appears to be a replica of the previous application DC/18/0439/OUT. The supporting documents such as "The Planning Statement" have been regurgitated without any updating and the information given is now considerably out of date.

The site currently contains a single bungalow and garden. We understand that the site is currently occupied in contravention of condition 2 of the planning consent to application E/3086/4 which limited occupation to a person employed locally in agriculture. The applicant applied for a lawful development certificate in July 2017 DC/17/1894/CLE. This application was refused by SCDC.

The property has been known as Gorselands in previous applications it now appears to have reverted back to the name of Gorse Farm.

Contrary to the assertions made by the applicant the proposed development site is in "the countryside" and is outside the physical limits of the village of Waldringfield by some distance (more than 1.5km by road).

The application shows no connectivity with the limited number of housing already at Waldringfield Heath, and will double the number of dwellings in this area of countryside. There is virtually no Public Transport in the area so all journeys to facilities such as healthcare, shops, employment, community centre etc will be taken by car. The application therefore does not comply with paras 32 &35 of the NPPF.

The applicant doesn't state if mains water will be supplied to the proposed development. Residents at Waldringfield Heath currently rely on boreholes –these would be at risk of pollution from the proposed development. In addition, without a mains supply and appropriately placed hydrants there is no suitable water supply for the Fire Service in an emergency.

There is photographic evidence that the site has previously been used for the burying of commercial waste and would therefore suspect that specific areas of the site might well be contaminated. This may not have been identified by the random samples taken in the contamination survey. We would be happy to provide the photographic evidence so that the relevant areas can be identified for further tests.

The site at Gorse Farm is currently a secluded haven for wildlife. Neighbouring properties have significant evidence of bat activity in the area and the trees within the Gorse Farm site currently provide excellent roosts for bats and birds, including owls. The application seeks to remove 20+ of these mature trees.

We are very concerned that this proposal will have a negative impact on the Deben SPA. The site is barely 1 kilometre from the Deben SPA (Ramsar) site. According to SCDC's Local Plan Appropriate Assessment this distance places it within a "regular" walking distance of the SPA, including walking with dogs, with the resultant increase in disturbance to birds and other wildlife. We would argue that the very limited on-site facilities would not provide an appropriate level of mitigation. We therefore consider that the effects of this proposal in-combination with the recently approved Adastral Park/Brightwell Lakes are likely to increase recreational pressures on the designated sites.

The Eastern boundary of the Adastral Park site has been designed specifically to maintain a clear and significant separation between the Adastral Park development and the neighbouring countryside and indeed the AONB, in an effort to minimise its negative impact. Any additional, bolt -on development, such as this application would negate this agreed design.

The applicant has not been able to show a need for such a development within the area covered by SP20. Since the applicant prepared this application the Outline application at Adastral Park has been permitted, S106 agreements are in place and the development is being actively progressed under the name of Brightwell Lakes. Reserved matters have been approved and construction starts in 2019.

The Gorse Farm application appears to be simply seeking to piggyback onto the Adastral Park housing allocation and subsequent permitted Brightwell Lakes application. Suffolk Coastal's Draft Local Plan shows that since 2014, 2823 new homes have been committed to in the East of Ipswich area. This is considerably higher than the 2320 identified in SP20, (which includes Waldringfield, Newbourne etc), for the entire period of the Core Strategy (2013 – 2027).

In summary, it is clear that the application does not comply with the following SCDC policies and therefore should not be permitted.

- It does not satisfy the requirements of SP19, SP29, DM3, and DM4 in relation to development within the countryside, in particular that within the countryside there should be "No development other than in exceptional circumstances" There are no exceptional circumstances in this case.
- It does not satisfy the requirements of SP27 as it outside and quite separate from the physical limits of the local service centre (Waldringfield)
- It will have a negative in-combination effect on the Deben SPA.

The applicant appears to rely on his assertion that SCDC is not able to demonstrate a sufficient housing land supply and that therefore all of the above policies should be considered out of date as described in NPPF para 49.

However, more up-to-date information is now available, including the continuing upward trajectory of the number of house completions in 2016/17/18, the approval of

the Adastral Park/Brightwell Lakes Outline application and the data (SHMA/OAN) now published in the Draft Local Plan.

We understand that SCDC now believes that it can demonstrate significantly more than the required housing land supply and trust that it will therefore give full weight to its existing policies when determining this inappropriate application.