



Waldringfield

Parish Council

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Re. Waldringfield Parish Council Response to Planning Application DC/19/2065/FUL

Land at Waldringfield Golf Club, Newbourne Road, Waldringfield, IP12 4PT – redevelopment of golf course practice area for holiday / tourist accommodation, including swimming pool building, landscaping and access; and retention of the existing Golf Club House and its associated car park.

Dear Natalie Webb,

At the meeting of Waldringfield Parish Council on 11th June, it was resolved to recommend that this application is **refused permission**.

This application is clearly another attempt by the applicant to piggyback on to the approved application for Brightwell Lakes.

The Golf Club was bought by the current applicant, a property developer, not because it was a successful golf club, but as a speculative investment as a potential development site even though development on this site did not comply with the SCDC Local Plan of 2013.

It was clearly an investment that carried risks. It is therefore entirely unacceptable for the applicant, in 3.1.8 of the Environmental Statement, to claim that the “current golf club is struggling to remain economically viable” as a justification to discount the “do nothing” option. The ES is clearly non-compliant with EIA Regs.

Various applications made by the applicant to develop the site have either been refused or withdrawn. This most recent application does not comply with the SCDC/ESC current Local Plan nor the emerging Plan scheduled for adoption before the end of 2019.

The proposed development is within the AONB and is visible from a number of access points to the AONB, in particular from public roads and footpaths from the West and from the South. The current aspect when approached from these directions is open, with a few, low-density buildings scattered amongst screening trees and vegetation, entirely in keeping with its rural and countryside surroundings and as the gateway to the AONB.

The applicant states that the proposed development site is in a “transition zone” on the edge of the AONB, seeking to imply that the restrictions on development within an AONB don't apply to this site. This is nonsense. The site is currently an area of open and “un-built” space within the AONB and building on it would be contrary to NPPF para 74.

The eastern boundary of the approved Brightwell Lakes site has been drawn specifically to maintain a clear and significant separation between the new built environment of Brightwell Lakes and the AONB, in an effort to minimise its negative impact on the AONB. This separation area, which is outside the AONB, is the “transition zone” .

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The applicant, in the Landscape & Visual Impact Assessment section 6, states that the Bretts quarry dominates the land to the west of the application site, and that the quarry is between the application site and what is now the approved Brightwell Lakes site. This is clearly an erroneous statement made in an effort to downgrade the surrounding area as one dominated by “industrial” and “prominent areas of built form”. This assessment goes on to describe Waldringfield Heath as a “small linear village”. This is equally inaccurate and misleading. The area of Waldringfield Heath is designated within the SCDC/ESC Local Plan as “countryside”.

We consider the proposed wooden holiday chalets/cabins to be of particularly poor design and do not meet the higher standards required of any development when located in the AONB.

In addition, there appears to be an over-provision of some 100 holiday chalets at the nearby Moon & Sixpence. We would therefore suggest that there is no evidence to support additional units of this type.

We are very concerned that this proposal will have a negative impact on the Deben SPA. The site is 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. The number of additional walkers is likely to be greater from this development as the 58 holiday chalets would be particularly attractive to dog owners. We would argue that holidaymakers staying here would make multiple visits to the Deben shoreline (the SPA) and that the proposed very limited on-site “mitigation” will not deflect the holidaymakers from making regular and frequent visits to the SPA. We therefore consider that the in-combination effects of this proposal along with the recently approved Brightwell Lakes are likely to increase recreational pressures on the designated sites.

In summary, it is clear that this application does not comply with the NPPF as referred to above, nor does it comply with the following SCDC/ESC policies and therefore should not be permitted:

- SP15 (Landscape and Townscape) which seeks to resist proposals which comprise poor design and layout or seriously detract from the character of their surroundings and quality of the Area of Outstanding Natural Beauty.
- It does not satisfy the requirements of SP19, SP29, DM3, and DM4 in relation to development within the countryside.
- It does not satisfy the requirements of SP27 as it is outside and quite separate from the physical limits of the local service centre (Waldringfield).
- It does not satisfy the requirements of DM18 section (c) as the proposed chalets are of poor design and are within exposed parts of the AONB.

Kind regards,



Rebecca Todd
Parish Clerk