



Waldringfield Parish Council

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Waldringfield Parish Council's response to DC/20/5102/FUL Land Off Ipswich Road, Brightwell – Change of use of land for siting of 35 static units, 20 touring caravan pitches and 10 yurts.

Dear Rachel Lambert,

Waldringfield Parish Council **OBJECTS** strongly to this application and recommends that it is refused permission.

Background on the area surrounding the proposed site

A not dissimilar application for holiday chalets, sited to the south of Ipswich Road, was made some 15 years ago. This went to appeal, ref. APP/J3530/A/04/1165950 & 05/1180885, and that development was refused for a number of reasons – one of which was that the development *“would be harmful to the living conditions of residents in the area, particularly in Waldringfield, by virtue of visitor pressure and additional traffic”*.

We appreciate that time has moved on from this refused application. There is now a new Local Plan, we have the NPPF and some of the Planning Material Considerations have been amended since then. However, many principles remain the same and policies have evolved, in particular to take meaningful account of the environmental imperatives in light of the Climate Emergency and the overarching requirement that development must be sustainable.

The application site is a greenfield site currently used for agricultural purposes. This area to the south of Ipswich Road is broadly an undeveloped swathe of land, primarily agricultural, running from Foxhall to the west, Waldringfield to the east, and Newbourne and the Orwell villages to the south. The land largely retains its uninterrupted and unspoiled character and is the gateway to the adjacent AONB which lies immediately to the east.

Whilst the Local Plan is broadly supportive of new tourism opportunities, it sets out the areas where development would be acceptable, but the application site is not within any of these areas.

The proposed site is within an unsustainable location which is outside of, and detached from, settlement boundaries. This area in the countryside has not been allocated in the Local Plan for tourism and does not contribute towards the achievement of sustainable development as outlined in Section 2 of the NPPF.

Omissions in the application documents

The information provided within the application is not complete and in some cases is misleading and we suggest that the applicant should be required to provide further information before the application is determined, e.g.: how will a water supply be accessed in this location? The Fire & Rescue Service points out that the nearest water hydrant is 2,000 metres away – what fire safety measures are included in the development? What energy efficiency measures are to be included in the development as encouraged in Policy SCLP6.4 (g) Renewable energy provision is strongly encouraged.

We are also concerned that the applicant appears to be challenging Policy SCLP6.5: New Tourist Accommodation, i.e.

New tourist accommodation will be restricted by means of planning conditions or obligations in accordance with national policy for planning conditions and obligations which permit holiday use only, restricted to a continuous period of 56 days by one person or persons within one calendar year, plus require a register of all lettings, to be made available at all times.

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We say that 56 days represents a long holiday stay and should be quite sufficient for the majority of holiday makers. Our concern is that this could indicate that the static units are to be used as permanent or semi-permanent residential dwellings.

Our concerns are compounded by the nature of the “static units” shown in the application. The website of the supplier, “The Omar Park & Leisure Homes” makes it clear that these “units” are “residential park homes” – see the following extract from the website: -

“Browse our market leading range of residential park homes for sale. All of our park homes are suitable for residential use throughout the year and are built to last at least 50 years!”

Originally launched in celebration of the Royal Wedding, the Middleton is a fully furnished and affordable park home, available in a variety of standard layouts”.

We say, therefore, that in addition to those policies relating to tourism, this application should also be considered against, Policy SCLP5.16: Residential Caravans and Mobile Homes

As a residential use, the principal of development of permanent residential caravans and mobile homes will be considered under the relevant policies for housing

and

Policy SCLP5.3: Housing Development in the Countryside.

We now list the main reasons for our objection.

Poor design

The proposed site is within 300 metres of the Area of Outstanding Natural Beauty which attracts the highest status of protection.

The Inspector for APP/J3530/A/04/1165950 & 05/1180885 opined that “*AONB restrictions, which seek to resist proposals which comprise poor design and layout or seriously detract from the character of their surroundings and the quality of the AONB, will also apply to sites outside the AONB boundary when they will have an impact on these protected areas.*”

The proximity and the scale of the proposed development will inevitably have such an impact. We consider that the proposed 65 units is too high a number of units for the size of the site. The result is a regimented, overcrowded and cramped layout of particularly poor design with virtually no landscape features to mitigate the uniformity.

The applicant states that the site will not be visible from nearby PROWs and highways and proposes additional screening to avoid having a negative impact on the landscape. We do not agree with the applicant’s statement, PROW footpath 10 (Ipswich Road to Newbourne) is approximately 70 metres from the site, but in any event we refer to the opinion of the APP/J3530/A/04/1165950 & 05/1180885 Inspector who stated that “*development, irrespective of their immediate visibility would markedly damage the character of the area*”.

That aside, we say that the development does not in fact meet the design and layout standards required when located outside of the AONB and therefore is contrary to:

Policy SCLP6.4: Tourism Development outside of the AONB

Tourism development outside of the AONB will be supported where it:

d) Is of a scale that reflects the surrounding area

e) Is of the highest design standards;

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Negative impact on protected sites and lack of onsite mitigation

In addition to potential impact on the AONB, the development is approximately 1 kilometre from the Deben SPA & Ramsar sites and the Newbourne Springs SSSI. It is also within 7 kilometres of the Stour and Orwell Estuaries SPA and Ramsar, and the Sandlings SPA. It therefore falls within the 13-kilometre protection zone of European Designated Sites as set out in the Suffolk Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).

The shores and salt marshes of the Deben have already shown a marked deterioration as a result of the recent increased visitor numbers to Waldringfield during the restrictions caused by COVID 19. These areas are recognised as precious, very fragile and easily damaged by increased visitor numbers.

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site, as confirmed by Paragraph 177 of the NPPF.

Para 6.2 of the applicant's Ecological Appraisal acknowledges that the *"creation of 65 holiday plots: 35 static plots, 20 caravan, and 10 yurts... could create significant additional visitors to sensitive estuary, inland, and coastal conservation sites (SPAs and Ramsars), with potential for an increase in dog numbers. This could cause additional/significant disturbance to the species of interest within these sites, and so these potential impacts should be investigated further through the completion of a Habitat Regulations Assessment (HRA) – carried out by 'the competent authority'"*.

From the submitted details it is clear that the small amount of onsite open ground cannot be regarded as a SANGS provision. Not only is it too small, it has no features to encourage visitors to spend time at the site, particularly as any outlook from the site would be dominated by large and rather noisy wind turbines in the immediately adjacent field.

We trust that the District Council will ensure that an HRA is carried out prior to any determination of the application as currently the application is contrary to:

Policy SCLP6.4: Tourism Development outside of the AONB

Tourism development outside of the AONB will be supported where it:

c) Avoids, prevents or mitigates adverse impacts on the natural environment and on local landscape character;

and,

Policy SCLP6.5: New Tourist Accommodation

Proposals for new tourist accommodation will be acceptable where:

d) They do not have a material adverse impact on the AONB or its setting, Heritage Coast or estuaries;

and,

Policy SCLP10.1: Biodiversity and Geodiversity

Proposals that will have a direct or indirect adverse impact (alone or in-combination with other plans or projects) on locally designated sites of biodiversity or geodiversity importance, including County Wildlife Sites, priority habitats and species, will not be supported unless it can be demonstrated with comprehensive evidence that the benefits of the proposal, in its particular location, outweighs the biodiversity loss.

and,

Policy SCLP10.2: Visitor Management of European Sites

The Council has a duty to ensure that development proposals will not result in an increase in activity likely to have a significant effect upon sites designated as being of international importance for their nature conservation interest.

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No identified need

There is no identifiable need for such a development in this location. There are 11 existing holiday parks within 3 kilometres of the site, including Low Farm Cottages & Campsite to the east, and the Moon and Sixpence Holiday Park to the north, as well as sites in Newbourne to the south. There is no evidence that these are at full capacity. We therefore consider that the need for tourism in this area has been met and the current proposal is somewhat excessive as there is no evidence for its necessity. It is therefore contrary to:

Policy SCLP6.5: New Tourist Accommodation

Proposals for new tourist accommodation will be acceptable where:

a) The demand or need for tourist accommodation is clearly demonstrated;

Unsustainable location

As identified in our background section above, the location of the proposal is in the countryside and is outside of any settlement boundaries. It is disconnected from local amenities and does not benefit from sustainable links to them. The applicant states that the site is served by public transport. This is not correct. The local bus timetable shows that there is a single bus service per weekday. It leaves at 09.27 to Ipswich via Waldringfield, Newbourne & villages, journey time 1 hour! There is a single return service arriving at 14.12. No service at weekends.

Within the proposal, there does not appear to be an analysis of walking routes to Waldringfield village or other settlements, nor any proposed mitigation measures to address safety and/or accessibility/usability issues. The roads providing access to the site and the nearest settlements containing services and facilities have no footways/pavements. It is acknowledged that there are two off-road bridleways, but it has not been established by the applicant whether these currently have a surface suitable for, or can be modified for, all-year-around/all-weather access. The applicant has also failed to provide details of walking distances to key facilities and services, along with a description of their measured walking routes including details of any mitigation proposed to address safety and usability. Therefore, it has not been demonstrated that a suitably safe pedestrian and/or cycle route to Waldringfield Village and other settlements could be provided.

It is therefore contrary to:

Policy SCLP6.4: Tourism Development outside of the AONB

Tourism development outside of the AONB should be directed to locations which are well related to the existing settlements and will need to demonstrate good connectivity with existing amenities, services and facilities, and promote walking and cycling opportunities where appropriate.

Tourism development outside the AONB will be supported where it:

a) Enhances the long term sustainability of the area;

b) Is well related to existing settlements;

No sustainable travel options/transport

The development shows car parking for 114 cars but does not show any charging points.

We do not consider the applicant's transport report to be robust in its findings as the sites chosen to illustrate likely traffic movements have little or no resemblance to the application site. As pointed out in another response:

The Malvern site offers the following attractions onsite: deer park, pub restaurant, events programme, children's adventure park, fishing and walking trails.

The Sand Le Mere CP offers onsite: pool, sauna, steam room, fishing lakes, crazy golf, kids adventure playground, entertainments, kids entertainments, bar, restaurant, takeaway shop and cafe.

As can be seen, both of these sites had at the time an extraordinary amount of onsite activities to keep visitors within the parks with little reason to travel elsewhere. Compare the above onsite facilities with those proposed on the

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application site – ie, pocket handkerchief square of grass plus utilities (toilet & shower blocks) and a bird's eye view of the adjacent wind turbines and solar panels.

The content of the paragraphs above show that the visiting holidaymakers/semi -permanent residents would have little or no incentive/reason to spend time on the proposed site and would have every reason to travel off the site in order to seek enjoyment/recreation elsewhere. With no sustainable travel options accessible from the site (even the driveway from the Ipswich Road to the actual site is nearly 1 kilometre) all visitors/residents would be reliant on private motor vehicle travel. This is not acceptable for a development of this scale, particularly in this time of Climate Emergency.

We would argue that holidaymakers/residents staying at the proposed site would make multiple visits by car to the Deben SPA and to Waldringfield in particular, resulting in increased traffic pressure on the narrow, mainly single-track roads and considerable disturbance to local residents.

Given that the application proposes 65 units, some of which are static/permanent, we suggest that the application is contrary to:

Policy SCLP7.1: Sustainable Transport

Development will be supported where:

- b) It is proportionate in scale to the existing transport network;*
- c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;*
- d) It is located close to, and provides safe pedestrian and cycle access to services and facilities;*
- e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking;*
- g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety;*

Light pollution

The area in which the application sits is currently an area that enjoys dark skies at night. The lighting plans and types of lighting illustrated in the application will cause unacceptable levels of light pollution. It is therefore contrary to:

Policy SCLP6.4: Tourism Development outside of the AONB

Tourism development outside the AONB will be supported where it:

- f) minimises light pollution from artificial light sources and ensures the retention of dark skies*

No economic benefit

The applicant suggests that it would bring economic benefits to the settlements in the surrounding area – this is highly questionable given the lack of connectivity. Any potential economic benefit would be minimal, and as the development is likely to have a negative effect on the environment, it could even create an inverted effect to the local economy. It is therefore contrary to:

Policy SCLP6.1: Tourism

The Council will seek to manage tourism across the plan area in a way that protects the features that make the area attractive to visitors, and supports local facilities where the local road network has the capacity to accommodate the traffic generated from proposals.

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In conclusion, this development is totally unsustainable and unjustified when measured against a myriad of criteria and material considerations.

It should therefore be rejected.

Kind regards,

A handwritten signature in black ink, appearing to read 'R. Todd', written in a cursive style.

Rebecca Todd, Parish Clerk – on behalf of Waldringfield Parish Council