



Waldringfield Parish Council

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Waldringfield Parish Council's response to **DC/21/2391/FUL** Land off Ipswich Road, Brightwell IP10 0BJ – Change of use of land for siting of 31 static units and 12 touring pitches and ancillary facilities – re-submission of DC/20/5102/FUL.

Waldringfield Parish Council **OBJECTS** strongly to this application and recommends that it is refused permission as in our opinion this application is contrary to the following policies:

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

Policy SCLP5.3: Housing Development in the Countryside.

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.

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;*
- c) Avoids, prevents or mitigates adverse impacts on the natural environment and on local landscape character;*
- d) Is of a scale that reflects the surrounding area*
- e) Is of the highest design standards;*
- f) minimises light pollution from artificial light sources and ensures the retention of dark skies*

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

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.

Policy SCLP10.2: Visitor Management of European Sites



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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.

More detail regarding why this application is contrary to the policies listed above.

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

Policy SCLP5.3: Housing Development in the Countryside.

This area has been the subject of a number of planning applications over the years – all of those that have included any type of accommodation have been refused. Given Policy SCLP5.3: Housing Development in the Countryside it is extremely unlikely that any application for housing in this countryside setting would be permitted.

We are very concerned that the applicant is challenging the content of 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.

We say that 56 days represents a long holiday stay and should be more than 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. This is not an unreasonable concern as the static units are designed and marketed as “residential units” and do not comply with the definition of a “caravan”.

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

ie. Policy SCLP5.3: Housing Development in the Countryside.



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Should this application somehow be considered to be a genuine tourist development we would argue that is refused as it is contrary to the following policies:

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.

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.

The nearest settlement is Waldringfield, a very attractive, small riverside village with narrow roads without footpaths, leading down to a narrow beach. The Ecology Report mistakenly describes Waldringfield as having a “well developed waterfront area including a pub and a yacht club”. There is no yacht club, there is a members only sailing club which offers no facilities to tourists. The waterfront is not well developed and has little or no infrastructure to support any additional visitors. There are no public toilets nor any other visitor facilities other than a waste bin enclosure. The beach area has experienced a temporary increase in visitor numbers during the restrictions caused by COVID 19 which has overwhelmed the waterfront. We have attached photographs of the bins on one such sunny weekend. Piles of assorted rubbish overflow the bins onto the floor with no attempt to recycle. If the rubbish on the floor isn't cleared immediately, usually by volunteers from the village, the rubbish is carried out to sea at high tide, adding significantly to the levels of plastic pollution. The “COVID effect” will diminish but it clearly illustrates how even a relatively small increase in tourism in this area will damage the features that make the area attractive to visitors (and to the existing residents). In addition, the narrow roads into and within the village do not have the capacity to accommodate the additional traffic generated from this proposal.

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;

The NPFF says that in order for a development to be considered sustainable it must bring economic, social and environmental benefits.

The application provides no evidence that this development will enhance the sustainability of the area in any of the three components. 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 between the proposed site and existing settlements and amenities. The applicant mistakenly refers to bringing



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economic benefits to the pub and farm shop in Brightwell – there isn't a pub or a farm shop in Brightwell.

The wider area does contain a selection of farm shops but as these are all a car ride away it is just as likely that the visitors would drive to the retail park at Martlesham to spend their money at the national retail outlets rather than providing any benefit the local rural economy.

As the development is likely to have a negative effect on the environment, it could even create an inverted effect to the local economy. Certainly the impact on Waldringfield would be entirely negative.

The application design & access statement asserts that *"The development also fulfills the environmental role of sustainable development in that the site is accessible by public transport. Consequently, guests staying at the site would not be reliant on the private car to access the site or explore the local area"*

This is simply not true.

The local bus timetable shows that there is a single bus service per weekday. It leaves at 09.27 to Ipswich a journey time 1 hour! There is a single return service arriving at 14.12. No service at weekends.

Given the lack of access to public transport and the lack of connectivity with existing settlements and amenities there are no sustainable travel options open to visitors/residents at the site, (even the driveway from the Ipswich Road to the actual site is nearly 1km) 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.

In addition, the proposal offers no amenities on site other than toilet & shower blocks, a relatively small area of communal green space and a bird's eye view of the adjacent wind turbines and solar panels.

The visiting holiday makers/semi permanent residents would therefore have no 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. As previously stated, these journeys would of necessity be by private motor vehicle.

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.

This application clearly offers no social benefit and the applicant doesn't claim that it does. It therefore fails on all three components of sustainable development as outlined in Section 2 of the NPPF.

b) Is well related to existing settlements;



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The proposed site is within an unsustainable location which is outside of, and detached from, any settlement boundaries and amenities. It is disconnected from local amenities and does not benefit from sustainable links to them. The site is not served by a viable public transport service.

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

The Ecology Report identifies the adverse impact that this development will have on Newbourne Springs SSSI as well as the potential to damage the Deben SPA. The application does not include any meaningful mitigation measures. There is no designated "dogs off lead" area, there are no facilities on site to encourage visitors/residents to spend any relaxation time on the site. From the submitted details it is clear that the small amount of onsite open ground can not be regarded as a SANGS provision. The presence of the adjacent wind turbines and a caravan breakers yard will actively drive people from the site to look for relaxation elsewhere – ie to the protected, sensitive sites.

d) Is of a scale that reflects the surrounding area

As previously stated, the surrounding area is undeveloped countryside and the proposed development is therefore incongruous in the surrounding area.

e) Is of the highest design standards;

The proposed site is within 300 metres of the Area of Outstanding Natural Beauty which requires the very highest design standards.

We consider that the proposed 43 units is too high a number of units for the size of the site as well its location. The result is a singularly unattractive, regimented, overcrowded and cramped layout of particularly poor design with virtually no landscape features to mitigate the military style uniformity. Such poor design and layout will seriously detract from the character of the surroundings and the quality of the AONB,

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

The area in which the application sits is currently an area that enjoys dark skies at night. There is no evidence that the application will not cause light pollution in this otherwise dark sky location.

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;

The applicant appears to be capitalising on the COVID pandemic and the prohibition of overseas holiday travel which has temporarily increased demand for UK holiday accommodation. This demand will diminish significantly when overseas holidays are once again a viable option. Even taking account of a possible residual long term increase in demand, there is an abundance of holiday parks within the wider area.



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There are 11 existing holiday parks within 3km of the site, including Low Farm Cottages & Campsite, which is 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 does not provide any evidence to the contrary. In other words there is no identifiable need for such a development in this location.

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

As described above, this site is at the gateway to the AONB, we agree with a previous planning inspector's comments (APP/J3530/A/04/1165950 & 05/1180885) that such a development irrespective of its immediate visibility would markedly damage the character of the area.

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.

The Ecology Report identifies the adverse impact that this development will have on Newbourne Springs SSSI as well as the potential to damage the Deben SPA. The application offers no comprehensive evidence that the benefits of the proposal, outweighs the risk of biodiversity loss. 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.

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

It should therefore be rejected.

NB

- a) We feel bound to point out that the majority of “neighbour responses” that offer a few lines of support for this application do not appear to have any local connection to the site concerned.
- b) The comments from the Economic Development Team are referring to “Bromswell”