



# Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley

Low Farm, Ipswich Road, Waldringfield, Woodbridge,  
Suffolk IP12 4QU

Email: [pc.waldringfield@googlemail.com](mailto:pc.waldringfield@googlemail.com)

Telephone: 01473 736475

Website: [www.waldringfield.onesuffolk.net/parish-council](http://www.waldringfield.onesuffolk.net/parish-council)

## Brightwell Lakes ARMs

DC/21/4002/ARM, DC/21/4003/ARM, DC/21/4004/ARM, DC/21/4005/ARM

### Consultation Response by Waldringfield Parish Council, 22/10/21

We would like to thank the officers from ESC and the representatives of the applicants for organising and attending the two virtual meetings held on October 15<sup>th</sup>. Both meetings were extremely helpful.

Most of the issues we wish to raise apply to each/all of the applications listed above and this response is sent in respect of each of the 4 ARMs.

Our comments are based primarily on assessing the information included in these applications against conditions in the Outline Planning Permission DC/17/1435/OUT. We have arranged our comments by topic.

#### 1. Access

The applications include statements that are ambiguous and in some cases contradictory, here are some examples:

*"The **main access** to the Site is from Ipswich Road located on the southeast. A further vehicular access is proposed from the Boulevard Spine Road which links to the **main access** via the proposed primary road." (DCS Phase E1, §3.13).* (Our emphasis).

It is not clear from the above paragraph whether the reference to the "Site" relates to the entire Brightwell Lakes site or just the area of phase E1. Also it doesn't specify if the access to Ipswich Rd is the East Ipswich Rd access or the West Ipswich Rd access.

*"The **main vehicular route** into Phase E1 is located on the south-east providing access to Ipswich Road and the wider highway network. A **secondary access** is to be created from the Spine Road ..."* (Phase E1 Planning Statement, §3.3) (Our emphasis).

In more recent discussions with the applicants we have been informed that *"Once occupied, residents will **only be able to access the site via the new A12 junction and the Eastern Ipswich Road access points**."* (Our emphasis.) Is this the entire Brightwell Lakes site or just the area of phase E1?

*"Alongside new point of access which in the short term will provide a temporary exit route for construction traffic but over the lifetime of the development be converted into an emergency access point **only**."* (Phase E1 Planning Statement, §5.59) (Our emphasis).

Subsequent discussions with the applicants indicated that the above paragraph is referring to West Ipswich Rd access but this is not clear from the statements in the ARMs. Is this to be seen as VOC of Condition 43, or is it an error?

We would ask that the ARMs are amended to ensure that there is complete continuity and consistency across all the statements on the matter of the access routes within the ARMs in order to comply with outline planning consent conditions and avoid misunderstandings/confusion.



# Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley

Low Farm, Ipswich Road, Waldringfield, Woodbridge,  
Suffolk IP12 4QU

Email: [pc.waldringfield@googlemail.com](mailto:pc.waldringfield@googlemail.com)

Telephone: 01473 736475

Website: [www.waldringfield.onesuffolk.net/parish-council](http://www.waldringfield.onesuffolk.net/parish-council)

The outline planning permission is clear that the primary access point is to be a new traffic signal controlled 3 way junction on the A12 between the existing Foxhall Road and BT roundabouts. Two secondary access points are proposed onto the Ipswich Rd.

## 2. Charging Points for Electric Vehicles

The move towards electric vehicles (EVs) has accelerated considerably since the outline planning consent in 2018. The UK Government intends to pass legislation (which will come into law in 2022) which will mandate EV charging points on all new buildings: *"We will publish our consultation response on requiring all new residential and non-residential buildings to have a charge point, and we intend to lay legislation later this year,"* (Department for Transport Minister Rachel Maclean. <https://earth.org/uk-to-be-first-country-to-require-new-homes-to-have-built-in-ev-chargers/>)

We are not planning lawyers but this would seem to override the now outdated planning condition 64.

*"Prior to the submission of the 1000<sup>th</sup> dwelling for layout reserved matters approval, an electric vehicle charging strategy shall be submitted" (Planning Condition 64).*

Even without the anticipated new legislation this planning condition has been overtaken by the rapid development of technology and sales and is now in conflict with:

### **"ESC Policy SCLP7.2. c)**

*Proposals involving vehicle parking will be supported where they take opportunities to make efficient use of land and they include: c. Appropriate provision for vehicle charging points and ancillary infrastructure associated with the increased use of low emission vehicles;"*

This is referred to in the both the E1 and W1 Planning Statements, §4.18.

However, there is no mention in any of the four ARMs of charging points for electric vehicles, either attached to the houses or in the parking courtyards, or on the street. Given that all new cars sold from 2030 onwards are to be EVs, it is essential that all homes and all parking courtyards have EV charging points.

If the charging strategy (let alone the actual charging points) is delayed until plans for 1,000 houses have been submitted, that will be far too late. What would happen to the plots that have already been built? Either they would be left without public charging points, or charging points would have to be retro-fitted, which would be disruptive and expensive.

We appreciate there are complications with management companies and a rapidly changing technology, and that charging points are covered by building regulations rather than planning, but feel that a general statement of strategy from both ESC and the applicants would be helpful.

## 3. Street Lighting

There is no mention of street lighting and the need to avoid light pollution. There are some welcome statements in the *Environmental Action Plan, Appendix 6: CEMP Ecology Method Statements, Protection from lighting disturbance*, but this is solely about the construction phase (CEMP = Construction Environmental Management Plan).

Following subsequent discussions with the applicants we understand that the details of the external lighting will now be submitted as an addition to the ARMs to comply with condition 61:



# Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley

Low Farm, Ipswich Road, Waldringfield, Woodbridge,  
Suffolk IP12 4QU

Email: [pc.waldringfield@googlemail.com](mailto:pc.waldringfield@googlemail.com)

Telephone: 01473 736475

Website: [www.waldringfield.onesuffolk.net/parish-council](http://www.waldringfield.onesuffolk.net/parish-council)

*"As part of each layout reserved matters application, details of external lighting to be installed ... shall be submitted to and approved" (Planning Condition 61)*

We would ask that consultees are given the opportunity to comment on these later submissions.

## 4. Construction Phases

Apart from the ecological constraints described in the CEMP, there doesn't seem to be anything about how the construction phases will work. How will the building materials, lorries, diggers, etc. access the site? What volume of construction traffic is predicted along the Ipswich Rd for the two main phases (E1 and W1)? Is the A12 access to be used for construction traffic?

We appreciate that prior to any development taking place a Construction Method/Management Statement will be submitted for approval (*Planning Condition 18*), however it would be useful to have answers to these questions this stage, as they will have a profound impact on the traffic on the Ipswich Road and therefore on the residents of Waldringfield.

We would like assurance that the public footpaths running along the south sides of both sites, E1 and W1 will remain open during construction.

## 5. Car Parking

Since the tertiary roads within the phases are so narrow, it is essential that sufficient off-street and on-street parking laybys are provided, to prevent parking in the roadside, potentially blocking the road. We would ask for the parking provision to be broken down and shown by ARM areas rather than for the whole site.

The off-street parking courts in the private parking areas appear to be isolated from the dwellings they are serving, and in many cases these areas are bordered by garden fences/hedges etc and so are not overlooked by the residents of the dwellings. We are concerned that, because of this layout, getting from the parking bay to the front door could be intimidating and possibly dangerous at night, particularly for women. We would wish to see the detailed lighting plan for these areas included in the plans to be submitted under item 3 above.

## 6. Energy Efficiency

There appears to be no mention of the energy efficiency of the houses. Given that the Government is legally obliged to reduce the UK's greenhouse gas emissions by 68% by 2030, and that housing contributes 18% of the UK's emissions, it is essential that all new homes are built to the highest possible standards of energy efficiency. Will the houses have loft insulation? Cavity wall insulation? Double or even triple glazing? Solar PV panels? Heat pumps?

## 7. Phasing and Timing

Although a phasing map is provided, there are no accompanying dates or even approximate timings. Some timings have been provided elsewhere, for example in the slides which were presented to the Brightwell Lakes Community Forum in June 2021, but without this information in the ARMs it is difficult to get a clear picture of how these four phases fit in to the bigger picture.

We ask to be provided, as part of the ARMs, a timing sequence of the start and completion dates of:

- Ipswich Rd access West
- Ipswich Rd access East



# Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley

Low Farm, Ipswich Road, Waldringfield, Woodbridge,  
Suffolk IP12 4QU

Email: [pc.waldringfield@googlemail.com](mailto:pc.waldringfield@googlemail.com)

Telephone: 01473 736475

Website: [www.waldringfield.onesuffolk.net/parish-council](http://www.waldringfield.onesuffolk.net/parish-council)

- A12 junction
- 'Spine' road (boulevard)
- Phases W1, W1a, E1 & E1a
- SANG (various areas)

## 8. Previously submitted but undetermined ARMs

We understand from subsequent discussions with the applicant and ESC that the applicants are currently reviewing/amending the two extant ARMs DC/18/2774/ARM (infrastructure) and DC/18/2775/ARM (SANG), and that these revisions will shortly be submitted to ESC. We ask to be notified and invited to comment on the changes.

## 9. Phase E1a

The *Phase E1 Landscape Masterplan (JBA18/163-SK02)* clearly shows the E1a area covering 9 houses, whereas all the other plans show E1a covering a much smaller area of just 3 houses. We have learnt in subsequent discussions that E1a will now consist of just 3 show houses.

## 10. Landscaping & Arboriculture

WPC's Tree Warden has submitted comments on the landscaping and arboriculture aspects separately, and WPC fully endorses these.