



Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley
Low Farm, Ipswich Road, Waldringfield,
Woodbridge, Suffolk IP12 4QU
Email: pc.waldringfield@googlemail.com
Telephone: 01473 736475
Website: www.waldringfield.onesuffolk.net/parish-council

WPC response to Planning Application DC 22/1117/FUL

Continuation of use of land as a caravan and camping site for up to 70 pitches together with the creation of a new access off Ipswich Road - Low Farm Ipswich Road Waldringfield Suffolk IP12 4QU – **Planning Officer Mark Brand - Comment deadline 28th June 2022**

Based on the information submitted with this application Waldringfield Parish Council is unable to support this application and therefore maintains a "**HOLDING OBJECTION**".

We do so for the following reasons.

We understand that this application includes two separate but related proposals.

1. Regularisation and authorisation of numbers of camping/caravan pitches to 70 total from the 35 already approved by condition of planning permission C/09/0644
2. Creation of new site access off Ipswich Road to serve Camping and Caravan site

Firstly we would like to commend the applicant and to thank them for the detail supplied with the application including the pre application advice, all of which is extremely helpful.

However the Parish Council does have some queries and some concerns.

Re: 1. Regularisation and authorisation of numbers of camping/caravan pitches to 70 total.

The application Planning Statement includes a marketing diagram of the site indicating the availability of 70 pitches but we have found nothing in the application to show this number of pitches are regularly in use. We would therefore ask for evidence to confirm the number of camping/caravan pitches regularly occupied at the campsite.

If fewer than 70 pitches are currently and regularly occupied we would then wish to assess the impact of the increase in visitor numbers on the village & the Deben SPA & RAMSAR.

- See Policy SCLP10.2: Visitor Management of European Sites, and
- Policy SCLP6.5: New Tourist Accommodation a) and
- Policy SCLP10.1: Biodiversity and Geodiversity

But if 70 or more are regularly accommodated on the site via the existing access, we would question the need for the second part of this application i.e. to create a new, large vehicular access with all the issues that entails.

Re: 2. Creation of new site access off Ipswich Road.



Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley
Low Farm, Ipswich Road, Waldringfield,
Woodbridge, Suffolk IP12 4QU
Email: pc.waldringfield@googlemail.com
Telephone: 01473 736475
Website: www.waldringfield.onesuffolk.net/parish-council

The proposed new entrance would be outside the settlement boundary, so in the "countryside" in planning terms and of course is in the AONB. The entrance would be on the derestricted section of Ipswich Road - speed limit 60 mph.

This section of Ipswich Road, the main access route to the village, is a narrow and twisting road. The proposed entrance is close to a bend in the road to the west. Even with the proposed visibility display, we would question if vehicles travelling from the west would see in time to stop, to avoid for example an emerging car with caravan attached manoeuvring out of the entrance and blocking the narrow Ipswich Road.

- See applicant photograph V2 Ipswich Rd.png

The existing entrance has the benefit of being opposite an open entrance to a neighbouring property. Whilst not ideal, this does provide some extra width should an emergency manoeuvre be necessary to avoid a collision on the road.

We note that the traffic surveys were completed in the month of October. This does not reflect the significant increase in traffic numbers on this road during the spring & summer months generated by Waldringfield Sailing Club members & visitors, sometimes towing boats, plus the high level of visitors to the very popular "all day" local public house, The Maybush. This needs to be considered alongside the in-combination effect of additional traffic movements that will be generated by the approved application for 2000 new dwellings etc at Brightwell Lakes.

We would therefore wish to see a new traffic survey conducted during the Spring/Summer period.

- See *Policy SCLP7.1: Sustainable Transport a) & b)*

This level of traffic also of course has an impact on pedestrian safety. We do not accept the validity of Planning Statement 5.14 which states "*..... all walkers, walk safely on the road because of the relatively low volumes of traffic and its low speed, as the traffic survey data demonstrates*".

This is based on an October Survey— see above, and therefore is not a true reflection of traffic movements experienced in the Spring, Summer & early Autumn months.

Any increase in the number of pedestrians emerging onto a notoriously dangerous, blind bend with no footpath at the corner of Fishpond & School roads will carry significant risk to pedestrians. (SCC highways have previously recognised this issue and working with WPC have tried to produce a safer design for this corner but no solution has yet been found.)

- See *Policy SCLP7.1: Sustainable Transport g)*

Paragraph 5.16 includes "*a plan extract showing one of the recommended OS based walks (red line on the extract) with Low Farm marked on and from which it can be seen that access to walks in the area are positively advocated using 'country lanes'. This provides access to the wider area, all part of the tourist offer of the area.*"



Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley
Low Farm, Ipswich Road, Waldringfield,
Woodbridge, Suffolk IP12 4QU
Email: pc.waldringfield@googlemail.com
Telephone: 01473 736475
Website: www.waldringfield.onesuffolk.net/parish-council

It should be noted that the recommended walking route illustrated follows designated PROW footpaths, and “country lanes”, one of which is designated as a “No unauthorised vehicles” lane, the second is a designated “Quiet Lane”. It does not include the main vehicle routes of Ipswich Rd.

We are also very concerned about the removal of a very significant stretch of 125 mts of mixed hedging and the negative impact this will have. Although the application includes the planting of replacement hedging this will take a number of years to become an effective boundary screen.

- See Policy SCLP6.3: *Tourism Development within the AONB and Heritage Coast d)*

We welcome the Ecology Report but suggest that the Oak trees identified as T1 & T2 in the report should be given a TPO designation by ESC prior to determination of the planning application to ensure the protection of the oak trees. As ESC is fully aware, without such a designation, any planning conditions ESC might apply regarding the retention of existing trees would be unenforceable.

We also welcome the planting detail in paragraph 5.10 COMPENSATION of the same report

Residual significant negative effects upon habitats and species requiring compensation relate to the loss of the hedgerow.

The proposed site landscaping includes planting of a mixed native species hedgerow. This should be planted densely and double width to maximise hedgerow growth and form in the dry ground conditions. The following species are recommended for inclusion based on the dry soil conditions present locally:

- Hawthorn and plum (50%)
- Remaining 50% a mix of:
- Dog rose (*Rosa canina*)
- Field maple (*Acer campestre*)
- Wild privet (*Ligustrum vulgare*)
- Elder (*Sambucus nigra*)
- Wych elm (*Ulmus glabra*)

To offset loss of nesting habitat, 4 sparrow terraces and 6 open fronted boxes (Appendix A4) should be erected on suitable trees and buildings across the site. The orientation and height of each box should be agreed with a suitably experienced ecologist (e.g., ECoW) on site.

However, as the above are recommendations, for the avoidance of doubt, we would wish to see these planting details incorporated into a revised version of the Arboricultural Plan/Planting Plan, currently (017115816, Drawing Tree Survey & AIA LSDP 1734.01) and to be included in any relevant conditions applied in the event of planning consent being given.

We are concerned that no details are provided re the automatic check in gate - is this a pole or a solid structure? We would ask the applicant to provide an artist impression of the proposed finished entrance - particularly important as in the AONB and the gateway to the village. Similarly we seek more detail of the materials to be used for the surface treatment of the entrance.



Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley
Low Farm, Ipswich Road, Waldringfield,
Woodbridge, Suffolk IP12 4QU
Email: pc.waldringfield@googlemail.com
Telephone: 01473 736475
Website: www.waldringfield.onesuffolk.net/parish-council

- See Policy SCLP6.3: *Tourism Development within the AONB and Heritage Coast d), e) & f)*

We would wish to see a more detailed plan of the pods/toilet/washing facilities & where not connected to mains water & waste, the arrangements for access & disposal.

We would wish to see detail of any other facilities on-site such as a picnic area etc to offer some on-site mitigation to help reduce the increased visitor numbers to SPA.

We don't understand what is meant by the wording of para 5.12 of the Planning Statement.

"The new access will also provide the opportunity to achieve safer access by increasing the visibility splays of the access to the campsite combined with a proposed road width of 4.5m. A standard form of access Suffolk County Council, 'DM04' is proposed, sited at a point central to the property's frontage to the Ipswich Road or where the requisite visibility splays can be achieved. This will have visibility splays of 59m and 59m to the west and east from a 2.4m setback."

Where is the "proposed road with a width of 4.5m"? The access plan shows a width of 6m at the point of the automatic gate and little beyond the gate. We would wish to see more detail of the internal roads/tracks to understand the connections across the site, surface treatment etc and to clarify to what the 4.5m is referring.

We are pleased to see lighting details have been mentioned but suggest a detailed lighting plan is required, taking particular account of the dark skies policy within the AONB. The neighbouring former Golf Course is in the process of rewilding with the increased level of wildlife activity in the area.

- See Policy SCLP6.3: *Tourism Development within the AONB and Heritage Coast h)*

Until further information is submitted and our queries/concerns are resolved, Waldringfield Parish Council is unable to support this application and therefore maintains a "holding objection".

Should ESC be minded to approve this application, in addition to the above, we would seek conditions that include:

56 day maximum caravan stay, no flood lighting and some restriction on visitor arrival & departure times i.e. not 24 hours.

ESC policies considered in the above response include:

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.

Policy SCLP6.5: New Tourist Accommodation



Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley
Low Farm, Ipswich Road, Waldringfield,
Woodbridge, Suffolk IP12 4QU
Email: pc.waldringfield@googlemail.com
Telephone: 01473 736475
Website: www.waldringfield.onesuffolk.net/parish-council

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 SCLP6.2: Tourism Destinations

The Council will support proposals for tourism development that contribute to the broad appeal, accessibility and year round nature of destinations across the plan area. Tourism proposals should be of the highest standard of design and seek to protect and enhance the special character and interest of the destinations and the distinctiveness of the area with particular regard to sensitive landscapes and heritage assets.

Where necessary, applications for new destinations or the redevelopment or extension/intensification of destinations will need to be subject to screening under the Habitats Regulations. Any destinations which would result in significant adverse effects on European sites which could not be appropriately mitigated will not be permitted. A Landscape and Visual Impact Assessment will also be required where the destination is in an area of landscape sensitivity in accordance with the Landscape policies.

6.20

Tourism can take many forms but within the AONB, the Local Plan will only support developments and proposals which are of a higher standard of design, that reduce the impacts on the environment, by where appropriate, reusing existing buildings and which satisfy the primary purpose of designation, that is to conserve and enhance the special qualities of the AONB. Opportunities for innovative contemporary design are welcomed in appropriate locations within the AONB. The success of the tourism industry and the conservation of the AONB are not mutually exclusive. In this regard a supportive tourism strategy must acknowledge the importance of the scenic beauty and special landscape qualities of the AONB and the benefits associated with collaboration and communication between tourism businesses, visitors, local communities, and the AONB Partnership.

Policy SCLP6.3: Tourism Development within the AONB and Heritage Coast

Applicants are encouraged to engage with local communities and the Suffolk Coast and Heaths AONB Management Unit in evolving development proposals, with the aim of delivering development that takes an active role in the management of the local area. Tourism development in the AONB, or its setting and Heritage Coast will be supported where it:

- a) Enhances the long term sustainability of the area;*
- b) Is of a scale and extent that does not have a significant adverse impact on the primary purpose of the AONB designation;*



Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley
Low Farm, Ipswich Road, Waldringfield,
Woodbridge, Suffolk IP12 4QU
Email: pc.waldringfield@googlemail.com
Telephone: 01473 736475
Website: www.waldringfield.onesuffolk.net/parish-council

- c) *Is well related to existing settlements and / or supporting facilities;*
- d) *Avoids, prevents or mitigates for adverse impacts on the natural environment;*
- e) *Supports the conservation and enhancement of the natural beauty and special qualities of the AONB and its setting;*
- f) *Is of the highest design standards and where appropriate reuses existing buildings;*
- g) *Promotes innovative, contemporary design in appropriate locations;*
- h) *Minimises light pollution from artificial light sources and ensures the retention of dark skies;*
- i) *Avoids locations sensitive to the exposed nature of the AONB and Heritage Coast; and*
- j) *Demonstrates sustainable aspects of the development during construction and throughout the life of the development. Renewable energy provision is strongly encouraged.*

Policy SCLP7.1: Sustainable Transport

Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities. Development will be supported where:

- a) *Any significant impacts on the highways network are mitigated;*
- b) *It is proportionate in scale to the existing transport network;*
- 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; and*
- h) *The cumulative impact of new development will not create severe impacts on the existing transport network.*