



Waldringfield

Parish Council

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RE: Waldringfield Parish Council Response to DC/23/2735/P3Q, DC/23/2736/P3Q and DC/23/2737/P3Q - "Land at Gorse Farm"

This site was the subject of a previous similar/same application DC/21/5236/P3Q which was subsequently withdrawn by the applicant.

The new applications are virtually identical to the previous application other than there are now three applications, one for each of the existing buildings rather than one application for the whole development proposal.

WPC's response therefore should be applied to all three of the current applications.

WPC OBJECTS STRONGLY to these three applications for the following reasons.

The site

The application site is a narrow strip of land running parallel to that of the neighbouring dwelling Windycross whose southwestern boundary extends to the line of the southwestern boundary of the application site. The site is adjacent to the AONB to the east. The site forms part of the "buffer zone" between the Brightwell Lakes development and the AONB. The site is bordered to the southeast and southwest by a line of mature field maple trees on the boundary with the agricultural fields. Mature trees including oaks are to the north, in the grounds of neighbouring property, Windycross.

An important arm of the PROW network, Bridleway 9, runs through the site. It appears that this PROW Bridleway 9 has, at some point, been diverted without authorisation and is currently blocked by buildings. Contrary to the definitive map which shows the PROW running along the northern boundary of the site, the used route now runs between barns identified as B & C. The surrounding area is made up of arable fields. It is a recognised wildlife habitat including owls, bats and badgers. The site currently has no electricity, water supply or drainage. It has been the subject of a number of development proposals in the past, all of which have been refused.

Comments on the application

1) We visited the site and found that the existing "buildings" have deteriorated since the previous P3Q. The new application is relying on the previous STRUCTURAL FEASIBILITY REPORT prepared in 2021. As stated above, the buildings have visibly deteriorated since the previous application in 2021. WPC questioned in its response to the previous application the validity of this report as it does not show by whom it is written. It says it's prepared by "Athena Chartered Structural Engineering Consultants", but an extensive search has not identified this organisation. Professional qualifications are listed but are not attributed to an individual, neither is the report itself. There is no address, the only contact given is via a mobile number or a slightly unusual email address (for a professional entity) of Athenastructures99@gmail.com. We say that it is difficult to accept this report without the appropriate accreditation and in any event, it is out of date.

We consider that the "existing elevation drawings" bear little resemblance to the existing structures. Below are photographs taken 07 August 2023

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We suggest therefore that an accredited and current structural survey is required.

2) The site still shows considerable evidence of being used to dump/bury domestic and commercial (content unspecified) waste. Other waste including commercial items have been dumped on the surface/partially burnt. Consequently, we believe that there is a not insignificant contamination risk on this particular site. The Contaminated Land Survey Report included in the application is the same desk based survey of 2021, which relies on published data of the surrounding area, eg. identifying the nearest landfill site etc. - the type of survey used in conveyancing searches.



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We suggest therefore that this is not an appropriate survey for this application and that a contamination survey on the site including soil samples should be conducted.

3) We question the lack of reliable evidence provided to show that the proposed development meets the criteria set out in Class Q – agricultural buildings to dwellinghouses Permitted Development.

The application form gives the site address as “Land at Gorse Farm”, associating the site with agricultural use. However, that has not always been the case. For example: the previous application DC/21/5236/P3Q identified the site as “Chapel Works” (whose business was “engineering”). At the time of that application there was an external letter box on the wall of one of the units, clearly labelled as such and the unit was secured with a lock, as seen in the attached photos.



Indeed, the “bat survey” included in these new applications and dated June 2023 states on its cover:
REPORT NUMBER: 7389,EC,BAT,AG,KL,23-06-23,V1
SITE: Chapel Works, Newbourne Road, Waldringfield,
Woodbridge, Suffolk, IP12 4PT
DATE: 23/06/2023”

Whilst we accept that some of the buildings on the site have been used for some agricultural purposes over time, they have also been used for non-agricultural purposes such as commercial storage.

We would therefore ask for evidence from the applicant to show that this site and the buildings on it, do not fall into the **Class Q Development not permitted categories ie.**

Q.1 Development is not permitted by Class Q if—

(a) the site was not used solely for an agricultural use as part of an established agricultural unit—

(i) on 20th March 2013, or

(ii) in the case of a building which was in use before that date but was not in use on that date, when it was last in use, or

(iii) in the case of a site which was brought into use after 20th March 2013, for a period of at least 10 years before the date development under Class Q begins;

4) The plans do not show in any detail how the design of the proposed dwellings will accommodate the PROW Bridleway 9 which runs through the development site. The restricted width of the site, together with the planned new curtilage of each proposed dwelling would effectively prevent the use by horse riders of Bridleway 9 which is clearly unacceptable.

We suggest that more detailed and accurate plans are required to show how PROW would be retained and made suitable for the safe use of horse riders.

5) The current access point of PROW 9 is on Newbourne Road. The current vehicular use is limited to that from a single dwelling, Windycross. Should the development of 4 dwellings be approved it would be reasonable to assume that at least 8 additional vehicles would travel frequently along the PROW. We would argue that the existing access point is not suitable for this increase in traffic movements. Currently the access has poor visibility, particularly when turning left. See attached photos.



We suggest that a) much more detail is required to show how the required visibility splay can be achieved on the land within the ownership of the applicant and b) how the existing track can accommodate safely the existing PROW bridleway, plus the existing dwelling, plus the additional traffic generated by four new households.

6) We are very disappointed that the "wildlife" survey has been restricted to bat roosts on the actual site. However, the survey confirmed that whilst there was no sign of bat roosts within buildings 2 & 3 there was **significant bat activity on and around the site**. (our emphasis).

We noted, also on page 3, that the survey made the assumption that the buildings were to be demolished.

We suggest that a more detailed and comprehensive wildlife survey is required.

7) We can find no plans to show the internal ceiling heights of the proposed dwellings. We measured the existing eaves heights:

- Barn A is 2.02m, insulation and finishing would probably take it down to around 1.8m.
- Barn B is approx 2.35m, insulation and finishing would probably take it down to around 2.15m.
- Barn C is approx 2.02m, insulation and finishing would probably take it down to around 1.8m, however the outer eaves measured 1.2m, so with insulation and finishing this would be reduced to **1m**.

We don't have full size drawings so it is impossible for us to accurately calculate the actual usable space within the proposed dwellings. These calculations are vitally important as dwellings (including those under Class Q permitted development), must reach minimum square metre standards. From our measurements, we think that the finished measurements would be very tight and might well not meet the national standards, particularly when factoring in the following from the national space standards:

- *Any area with a headroom of less than 1.5 m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1 sq. m within the Gross Internal Area).*
- *The minimum floor to ceiling height is 2.3 m for at least 75% of the Gross Internal Area.*

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We suggest that plans should be provided to show the finished internal height measurements of the buildings if they were converted to dwellings and what percentage of the proposed living space would be "habitable".

8) In summary, for the above reasons, we say that this site has a number of significant constraints that make it unsuitable for the Prior Approval process. Any development on this particular site should be subject to the full planning application process.

Yours sincerely,



Jennifer Shone-Tribley, Parish Clerk – on behalf of the Waldringfield Parish Council

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