



Waldringfield Parish Council

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WPC response to application: **DC/26/0281/FUL** Proposal for 6 dwellings with garages and associated access – Land Adjacent To Mill Road, Waldringfield.

Dear Natalie,

The parish council is aware that ESC's Local Plan is now considered out of date and that there is therefore a presumption in favour of sustainable development, subject to the caveats specified in Paragraph 11(d) of the NPPF. We have therefore borne this "tilted balance" in mind when making our comments.

1. The application is outside the village settlement boundary and is therefore considered to be in the countryside. However, the application site is unusual, possibly unique, as it is bordered on 2 sides by dwellings within the settlement boundary (plus domestic gardens on the 3rd side). It is in the geographical centre of the village, within easy walking distance of the main facilities.
2. The site is within the AONB/National Landscape and is in close proximity to the Deben SPA. The Landscape Assessment includes a visual impact appraisal from a number of points around the site - these appear to show relatively minor visual intrusion. However, there is no viewpoint from the proposed entrance to the site on Mill Rd (although there is a viewpoint from Cliff Rd.) Mill Rd is a popular walking route for residents and visitors from the west side of the village to join the PROW network across Church Field towards the river and beyond to the East and the Church to the South.
3. The development would inevitably have a significant impact on the neighbouring properties to the north. We are very disappointed that the application does not include a drawing to illustrate the street scene of the complete site – internally and from the entrance at Mill Road - including boundary treatments. We consider this document to be necessary in order to assess the level of impact/loss of amenity on neighbouring dwellings and also on the Mill Rd street-scene (as would be required for most developments with immediate neighbours) in line with SCLP11.1 Design Quality iv.
4. The Ecology report acknowledges that the development will result a loss of 2.54 area habitat units (- 57.48%) against the 10% BNG requirements. It states that due to site constraints, "*additional on-site habitat creation is not feasible; therefore, off-site habitat creation or biodiversity unit purchases (2.9805) will be required to achieve the required >10% BNG. These off-site measures should target medium to high distinctiveness habitats and be secured through a formal agreement in accordance with statutory requirements.*" At a recent site meeting the architect indicated that biodiversity unit purchase was the most likely option. We would wish to point out that NPPF para 193 states that this approach should be regarded as "a last resort" rather than a preferred option. Given the sensitive location of the site, it is not unreasonable to suggest that either the on-site biodiversity areas could be increased in size, or alternatively a local off- site habitat be provided order to achieve a 10% BNG rather than purchasing units that are located somewhere in the country with no local benefit.
5. Another major concern is the lack of information regarding the ownership/management /maintenance plan for communal areas including biodiversity areas, site boundary treatments and the access road etc. It is worth noting that the line of oak trees to the south of the site are on Church Field & were planted 20+ years ago to define the boundary. The Tree Protection Plan for off site trees is included in the application documents, but this covers protection only during construction. There is no detail of

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how the trees are to be protected once the dwellings are occupied and as the roots and branches extend within residential curtilages.

6. We are not aware of any details of how surface water is to be managed on the site. Mill Rd has no surface water drainage and frequently floods, particularly with the change in weather patterns
7. Inadequate bin collection point – appears to be within the curtilage of plot 6
8. There are many inconsistencies within the documents including:
Design & Access statement page 2 states that there will be “2 x two bed dwellings, 3 x three bed dwellings and 1 x four bed dwelling”. However, the appendix 1 contains a chart showing 1x2 bed dwelling, 3x3 bed dwellings 1x3/4 dwellings and 1x4 bed dwelling. We suggest that the chart needs to be corrected.

If the figures given on page 2 of the D&A are the correct ones, the relatively modest scale of the proposed properties together with the affordable element could make a positive addition and help rebalance the Waldringfield housing stock, providing that all the other outstanding issues could be addressed.

- A further inconsistency in the D& A is on page 3 which states “*The proposed houses are predominantly single storey and can therefore include accessibility standards to Category 2: Accessible and Adaptable Dwellings (M4(2)) that is equivalent to Lifetime Homes Standard. Where attic/upper floor space is utilised, this will be for one of the bedrooms only to ensure all homes can accommodate at least one person with a disability.*” However, looking at the plans of the different dwellings - number 6 & 4 have no bedroom on the ground floor - We suggest this needs to be corrected.
- The design & access statement recognises that 1 in 3 houses in such a development must meet the “affordable” designation & suggests these would be 1 of the two bed and 1 of the three bed dwellings. It is somewhat ambiguous as it states: “*This can include 1 x two bed house and 1 x 3 bed house.*” It goes on to say: “*Tenure is to be agreed, however, the nature, size and location of this site would suit affordable provision made available for sale at below market (80%) value to persons with a local connection.*” We suggest this needs to be confirmed.
- There is also a discrepancy between the elevation drawings and the (albeit) illustrative drawing within the D&A, including materials.

In summary:

Given that this is a “full” application and not an “outline” application we consider that there are a number of areas where insufficient/contradictory information has been provided by the applicant – particularly given the sensitivity of this particular site, its location and the unusual circumstances.

We suggest that the following should be submitted by the applicant:

- Clarification on the breakdown of house sizes.
- Confirmation of details of the “affordable” dwellings.
- Clarification re the provision of a downstairs bedroom in all dwellings (not shown in plot 6 & 4)
- Confirmation of method to achieve a local BNG
- Street-scene drawings (internally and from the access to Mill Rd) so that it can be seen how the proposed new houses will appear in situ, in line with SCLP11.1 Design Quality iv. & SCLP11.2.
- Landscaping plans to include detail of curtilage boundary treatments, plus hard & soft surfaces.
- Ownership/management/maintenance plan for communal areas including roads etc., site boundary treatments and in particular, the biodiversity areas.
- More details on planting proposals/species eg. what are “*small urban trees*”? (Ecology report fig 4.)
- External lighting details and plan, in line with AONB guide and SCLP10.4

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- Meaningful detail of proposed materials & colours, in line with the AONB Guide.
- Glass specification, particularly for the rooflights, in line with the AONB Guide
- Clarification on surface water drainage.
- Clarification on ownership of the verge outside of the site plan (over which the access is to be created) plus clarification on who will carry out the work onto the highway and that the proper agreements and licences will be in place.

Without the above additional information to allow further/meaningful consideration of this application Waldringfield Parish Council wishes to register a **HOLDING OBJECTION**.

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