



# Waldringfield Parish Council

Parish Clerk: Jennifer Shone-Tribley  
Low Farm, Ipswich Road, Waldringfield, Woodbridge,  
Suffolk IP12 4QU  
Email: [clerk@waldringfieldparishcouncil.gov.uk](mailto:clerk@waldringfieldparishcouncil.gov.uk)  
Telephone: 01473 736475  
Website: [www.waldringfield.onesuffolk.net/parish-council](http://www.waldringfield.onesuffolk.net/parish-council)

WPC response to **DC/25/4781/FUL** - Change of Use of Land for the Siting of 25 Static Holiday Units, 12 Touring Caravan Pitches and ancillary facilities. Land Off, Ipswich Road, Brightwell, Ipswich, Suffolk IP10 0BJ – Planning Officer - M. Kavyani; Deadline 30 January 2026.

This application site has been the subject of a number of previous applications/appeals for similar developments, all of which have been refused. The application references some of the reasons for the previous refusals and seeks to illustrate how proposed changes in this new application might address those issues.

WPC recognises that changes have been made but does not consider that the changes, where they occur, are sufficiently different from the plans previously submitted and refused by ESC and the planning inspector. There are a few positive changes in this new application but much of the detail is missing or contradictory across the different drawings. We suggest that this needs to be addressed by the applicant.

The parish council therefore lodges a **HOLDING OBJECTION** to this application for the following reasons.

Extracts from the *Design, Access and Planning Statement (shown in italics)*, plus extracts from the planning inspector's comments (shown in blue) with WPC comments (shown in Calibri font).

*“Static units reduced from 31 to 25”*

- This has been achieved by removing the row of static units from across the western boundary of the site, the furthest point from the wind turbines, but the statement also says:

*“position [of] development [is] away from the more noise-sensitive southern portions of the site”*

- This statement is not supported by the site plans which clearly show all of the remaining static units and the caravan pitches in precisely the same location as previous applications, to the south of the site towards the wind turbines (which are not shown on any plans but which are visible on the Google map image on p2.

*“cluster static units in small groups to avoid a regimented appearance”*

- The remaining static units (and the caravan pitches) are arranged exactly as before – in unattractive, straight “regimented” lines

*“provide clear pedestrian routes to and from the amenity building, play area and site entrance.”*

- Clear pedestrian routes have not been identified, other than at the western edge where the row of static units has been removed – certainly not around the amenity area or “play” area. It would appear that there is no dedicated pedestrian footway, within the site, leaving those walking around the site and accessing the amenity block to walk in the vehicle route.

*“retain and strengthen existing woodland and hedgerow boundaries”*

- This is precisely the same detail as the site plan submitted in previous applications i.e. Drawing 2077 101 rev H JULY 2020

*“Pedestrian Connectivity and Sustainable Transport*

*In refusing the previous application, the Council concluded that:*

# Waldringfield Parish Council

*“the proposal is providing no safe pedestrian connectivity... The current route from the site to the associated public right of way network would be unsafe, with no footway or pedestrian or cycle infrastructure along Ipswich Road...”*

*The Inspector similarly found that pedestrians would have to walk within the carriageway of Ipswich Road, and that this would be hazardous, particularly in darker or poorer weather conditions, noting the lack of a formal crossing point or footway provision” – long extract below:*

*“.....However, were pedestrians to access Brightwell Lakes via Public Right of Way 8, to the north-east of the site on the other side of Ipswich Road, pedestrians would have to walk both along the top of a grass roadside verge as well as within the carriageway itself given that there are no footways.*

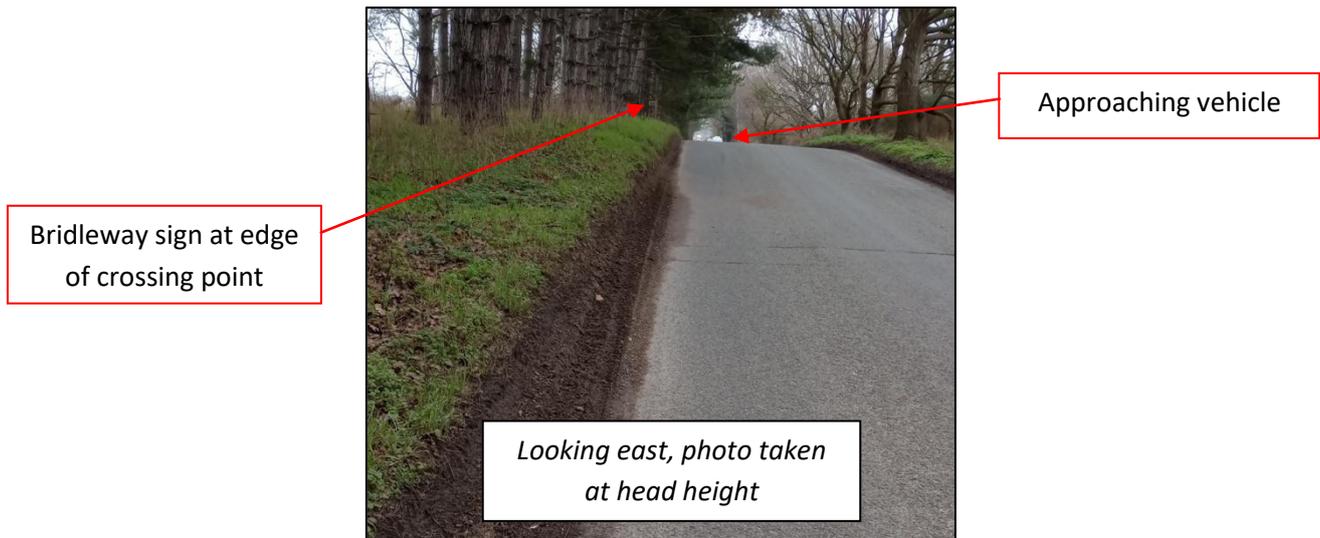
- 9. If pedestrians were to use the access track and then head back westwards towards the western access route into Brightwell Lakes, they would have to again walk along the verge and within the carriageway. Even if using the cut through which would appear to be available at the western end of the access track, pedestrians would have to take a rather secluded route on pathways through the shrubs. They would then have to pass through woodland that bounds either side of Ipswich Road as well as have to negotiate the sharp drop from the grass verges on Ipswich Road into and out of the carriageway.*
- 10. Even were the speed limit on Ipswich Road to reduce to 40mph as the evidence indicates that it will do as part of arrangements associated with the Brightwell Lakes development, the pedestrian arrangements would be likely to cause substantial harm to pedestrian safety, particularly during the darker and colder months when light would be limited and the ground conditions more uncertain.*
- 11. Whilst I note the lack of accidents in the area and recorded vehicle speeds, it cannot be taken as a given that visitors would be equipped with appropriate footwear and headtorches or that pedestrian trips would be carried out in groups or indeed that children would always be accompanied by an adult.*
- 12. There are no firm details on how the arrangement could be improved upon. Any prospective improvements are not a matter that I could condition given that I cannot be sure that such a condition would be reasonable in all other respects having regard to matters which could include cost or ownership.*
- 13. I conclude therefore that the proposal makes insufficient provision for pedestrian links to the Brightwell Lakes development. This restrains the sustainability of the proposal and would be likely to encourage travel to or from the site by private car due to the lack of a safe arrangement to foster pedestrian trips between the site and Brightwell Lakes”.*

- The new application includes new drawings (2512 305 & 306) showing a potential new pedestrian route off the site and across Ipswich Road. The drawings include photographs to illustrate the visibility splay.

*“In response to updated drawings and photographs demonstrating that 90m splays could be achieved and that the vertical alignment was **relatively flat in the vicinity of the proposed crossing**” (our emphasis).*

- This is misleading as the road is not “relatively flat”, there is a distinctive hump approximately 20 metres to the west of the crossing point which the photographs do not show. This considerably reduces the line of sight to the proposed crossing, for vehicles travelling eastwards.

See our photograph below:



- Once across the road potential users would still have to walk through the trees and shrubs to reach a recognised PROW (a distance of approximately 14 metres). In addition, should the application be permitted, it is unlikely that any condition relating to the proposed crossing and verges would be enforceable. (See paras 9-13 of the Inspector’s comments above and PROW comments below). WPC has experience of such a case where an application included works on the highway which were never carried out and which were found by ESC to be unenforceable even though conditions had been imposed.

Extract from the PROW submission:

“We note the provision of an uncontrolled pedestrian crossing connecting the site to Brightwell Bridleway 012. This route must be safe and accessible for all users, particularly pedestrians and cyclists wishing to access the PROW. This route will not be part of the legal PROW network and is therefore maintainable at the applicant’s expense. The route must be maintained to a safe level for all users as per NPPF 115 ‘safe and suitable access to the site can be achieved for all users’”

- NB – other drawings submitted do not include this new pedestrian footpath off the site.
- Details of the “on site facilities” on the new application remain sparse. The new proposed site plan now shows an EV charging point and a couple of disabled parking bays within the general parking area plus a small area designated as a children’s play area. No detail regarding the ground treatment, equipment, age range etc is provided for the play area. Similarly the open space (provided to encourage holiday makers to stay on the site) includes no detail of how this is going to be made “attractive” and be regarded as mitigating potential impact on the nearby protected sites.
- The application suggests that visitors to the proposed development would walk into Brightwell Lakes, incorrectly described as a “garden village” in order to access facilities, shop etc. Brightwell Lakes has never been designated as a “garden village” – it is a 2000 dwelling housing development, currently a building site with an anticipated completion time of a further 15+ years. Self-catering holiday makers will almost certainly prefer to shop at one of the 3 main supermarkets at Martlesham which will require the use of a motor vehicle.

To summarise, the unsustainable nature from a connectivity perspective is further amplified by the minimal on-site amenity facilities resulting in the likelihood that visitors will be wholly reliant on the private car. It therefore fails to secure Habitats Regulations mitigation and adequate visitor management.

The application barely considers the impact of increased visitor numbers to the Deben SPA and RAMSAR protected sites and fails completely to consider the increased traffic impact on the riverside village of Waldringfield and its residents. The site access is on the Ipswich Road – this leads directly to Waldringfield where it becomes a narrow, sometimes single track, C category road with no pavements or any pedestrian refuge. The village is already struggling to cope with the current volume of traffic and any increase in volume would be intolerable.

Finally, we are extremely concerned at the estimated number and frequency of tankers that will be required to empty the different cesspools. The applicant is clearly anticipating periods of the year when the site is fully occupied, in which case the static units alone would generate 12,600 litres per day which would require two 18,000 litre tankers every 3 days. The shower block would need to be emptied every 5 days. So, even without including the touring caravans, every 4 days an average of 4 x 18,000 litre tankers would be driving through the site, including the “green mitigation space” and conducting the inevitably smelly and unpleasant procedure of emptying the cesspools.

WPC therefore considers that this application 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.

### **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