



Committee Report

Planning Committee South – 18th October 2022

Application no DC/22/1117/FUL

Location

Low Farm
Ipswich Road
Waldringfield
Suffolk
IP12 4QU

Expiry date 24 July 2022

Application type Full Application

Applicant Mr Jack York

Parish Waldringfield

Proposal 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

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1. Summary

- 1.1. The application site relates to Low Farm Campsite located just outside the settlement boundary for Waldringfield on Ipswich Road. The wider site currently consists of a number of activities including holiday lets at the entrance and a separate let further into the site; a residential dwelling with agricultural tie; a caravan which has a lawful use certificate to be used as a residential dwelling; a farm compound and storage building.
- 1.2. The site is also host to the camp site which has 56 electric pitches and a further 14 un-serviced pitches in a woodland setting.
- 1.3. The proposal seeks to regularise the position with regard to the current level of use, which is 70 pitches; as well as to create a new access off Ipswich Road.
- 1.4. Waldringfield Parish Council have a holding objection which is set out in full in the consultation section of this report and summarised as the following:

- *Lack of evidence to suggest 70 pitches are currently in use.*
- *Assess impact of additional visits on the village and Deben SPA and RAMSAR*
- *New access located in the countryside and a 60mph road.*
- *Traffic survey carried out in October not a true representation of traffic numbers in the spring and summer*
- *Concerns over highways safety*
- *Concerns over removal of part of hedgerow*
- *Lack of detail on gate*
- *Wish to see more details of on-site facilities*
- *Lack of lighting plan*

"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."

- 1.5. This is a comprehensive submission where work has been undertaken prior to submission with the Local Highway Authority to establish suitable and workable solutions with limited impact. A thorough LVIA has been submitted along with an ecology report, all of which have been endorsed by consultee responses and the councils' officers.
- 1.6. Officers conclude that the proposals accord with the principles set out in the local plan in terms of its landscape and tourism policies and meet the requirements of the NPPF in terms of its setting.
- 1.7. The application was presented to the referral panel on 17th September 2022 as officers are 'minded to' approve the application contrary to the parish council's objection. The referral panel concluded that there were material planning considerations which warranted discussion by the planning committee.

2. Site Description

- 2.1. Low Farm is located on the western approach to Waldringfield; located within an Area of Outstanding Natural Beauty (Suffolk Coasts and Heaths AONB).
- 2.2. The part of Low Farm which is the campsite adjoins the north-western edge of the existing settlement boundary of Waldringfield and is itself bordered to the north and west by Waldringfield Heath Golf Course.
- 2.3. The Low Farm site frontage faces Ipswich Road to the south with an open arable field on the other side of Ipswich Road, extending to the existing, rear domestic curtilages of dwellings on Cliff Road.

- 2.4. Low Farm Campsite is located just outside the settlement boundary for Waldringfield on Ipswich Road. The wider site currently consists of a number of activities including holiday lets at the entrance and a separate let further into the site; a residential dwelling with agricultural tie; a caravan which has a lawful use certificate to be used as a residential dwelling; a farm compound and storage building.
- 2.5. The site is also host to the camp site which has 56 electric pitches and a further 14 unserviced pitches in a woodland setting. There are toilet blocks and facilities associated with this use. There is currently one access into the site which is the access for all of the current uses noted above in relation to the wider site.
- 2.6. The application site has an extensive history of use as a caravan and camping site. Notwithstanding this the application submission includes a series of Google Earth extracts which identify the use taking place prior to the 2009 consent.
- 2.7. Planning Application C09/0644, *Continuation of use of land as caravan site, including temporary retention of associated buildings*, was granted permission in 2009 to regularise the use of part of the land at Low Farm as a camping and caravan site at that time. A condition (3) of that consent was that the use be restricted to a relatively small part of Low Farm and to a maximum of 35 pitches.
- 2.8. Other planning history relevant to the above include:
- C/10/0831 - Demolition of existing WC block and porta cabin, erection of new WC and shower block and mess hall.
 - C/13/0806 - underground cabling between Bramford and Bawdsey

3. Proposal

- 3.1. The proposal seeks to regularise the position with regard to the current level of use, which is 70 pitches; as well as to create a new access of Ipswich Road.
- 3.2. The use, existing and proposed in this 'continuation of use' application, is that of a caravan and camping site for up to a maximum 70no. pitches. Presently there are 56no. pitches with services hook up points on the land and a further 14no. pitches (including 3 no. camping pods) located in the wildlife area which are without services and these will be maintained.

4. Third Party Representations

- 4.1. One letter of objection has been received from the Parish Council's Tree Warden who is a local resident.
- 4.2. The objection relates to the new access due to the removal of 125m of hedgerow which is old elm hedge to the farm fields formerly on the site. Although affected by Dutch Elm disease the hedgerow remains an important feature as a wildlife corridor and home to many species of invertebrates, birds and most probably bats, reptiles and amphibians which are abundant around here. Rabbits, hares, badgers, foxes and hedgehogs are also often around. The hedge appears on old maps and is very likely to be more than 200 years old.

5. Consultees

Parish/Town Council

Consultee	Date consulted	Date reply received
Waldringfield Parish Council	7 June 2022	28 June 2022
<p>“Based on the information submitted with this application Waldringfield Parish Council is unable to support this application and therefore maintains a "HOLDING OBJECTION".</p> <p>We do so for the following reasons.</p> <p>We understand that this application includes two separate but related proposals.</p> <ol style="list-style-type: none">1. Regularisation and authorisation of numbers of camping/caravan pitches to 70 total from the 35 already approved by condition of planning permission C/09/06442. Creation of new site access off Ipswich Road to serve Camping and Caravan site. <p>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.</p> <p>However, the Parish Council does have some queries and some concerns.</p> <p>Re: 1. Regularisation and authorisation of numbers of camping/caravan pitches to 70 total.</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none">• See Policy SCLP10.2: Visitor Management of European Sites, and• Policy SCLP6.5: New Tourist Accommodation a) and• Policy SCLP10.1: Biodiversity and Geodiversity <p>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.</p> <p>Re: 2. Creation of new site access off Ipswich Road.</p> <p>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.</p> <p>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,</p>		

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.*”

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.

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 approving 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

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;*
- 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."

Statutory consultees

Consultee	Date consulted	Date reply received
Natural England	25 July 2022	26 August 2022
<p>Summary of comments:</p> <p>NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED</p> <p>Consider that without appropriate mitigation the application could have likely significant effects (LSE) on the integrity of:</p> <ul style="list-style-type: none">o Deben Estuary Special Protection Area (SPA)o Deben Estuary Ramsar siteo Alde-Ore Estuary SPAo Alde-Ore Estuary Ramsar siteo Orfordness-Shingle Street Special Area of Conservation (SAC)o Sandlings SPAo Stour and Orwell Estuaries SPAo Stour and Orwell Estuaries Ramsar siteo damage or destroy the interest features for which the underpinning Sites of Special Scientific Interest (SSSIs) for the above European sites have been notified. <p>In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:</p> <ul style="list-style-type: none">o The mitigation required as suggested within the Habitats Regulations Assessment (HRA, East Suffolk Council, 24/08/2022), is a proportionate financial contribution to support the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy. The agreement of the reduced payment as outlined in the HRA is £1,873.78, to account for seasonal occupancy. This amount is considered sufficient to mitigate the in-combination impacts which will potentially arise from the application. <p>Advice that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.</p> <p>Natural England's further advice on designated sites/landscapes and advice on other natural</p>		

environment issues is set out below.

Consultee	Date consulted	Date reply received
SCC Coasts And Heaths Project	28 June 2022	19 July 2022
<p>Summary of comments:</p> <p>While the removal of the existing length of roadside hedge is regrettable and has the potential to open up views into the site, the AONB team recognise that any landscape and visual impacts will be temporary and very localised. The new hedge will also be more species diverse. The inclusion of oak trees will also add structural diversity along this frontage once the scheme establishes. The AONB team welcome that the new hedge will continue from the proposed access junction into the site. This planting will help to soften the visual impacts of the new access within the AONB.</p> <p>The AONB team welcomes that a Landscape and Visual Impact Assessment (LVIA) has been submitted with the application and the team broadly concurs with the findings in the LVIA about the landscape and visual impacts that will arise from the proposal. While the LVIA did not include a section 8 on mitigation, (Section 8 is missing), the AONB team is satisfied that the proposed planting discussed in other sections of the LVIA, in time, will help provide mitigation for the hedgerow removed to deliver the new access and once established will help to conserve and enhance the landscape character and special qualities of this part of the AONB.</p> <p>The AONB team fully endorse all the recommendations in the Ecology Report submitted to support the proposal.</p>		

Consultee	Date consulted	Date reply received
SCC Highways Department	7 June 2022	8 June 2022
<p>Summary of comments:</p> <p>No objection standard conditions recommended.</p>		

Non statutory consultees

Consultee	Date consulted	Date reply received
East Suffolk Environmental Protection	7 June 2022	7 July 2022
<p>Summary of comments:</p>		

No objection. Condition on any consent to ensure that there are adequate facilities for the storage and disposal of waste to the enlarged site and informative on Water Supply both recommended.

Consultee	Date consulted	Date reply received
East Suffolk Ecology	7 June 2022	20 July 2022
<p>Summary of comments:</p> <p>I have read the Ecology Report (MHE Consulting, May 2022) and I note the conclusions of the consultant.</p> <p>With regard to the proposed creation of a new access off of Ipswich Road, I agree with the conclusion of the ecological consultant that whilst there will be a short-term loss of boundary habitats, subject to the implementation of the identified mitigation and compensation measures there will be no significant adverse ecological impacts. Conditions are recommended below to secure the implementation of the necessary measures. With regard to the potential for the proposed development to result in impacts on nearby European designated sites (Habitats Sites), a separate draft Habitats Regulations Assessment (HRA) has been undertaken. This concludes that, subject to the advice of Natural England, the proposed development will not result in an adverse effect on the integrity (AEOI) of such sites, provided that a proportionate financial contribution to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) is secured.</p>		

Consultee	Date consulted	Date reply received
East Suffolk Landscape Team	28 June 2022	19 July 2022
<p>Summary of comments:</p> <p>No objection comments included within officer report.</p>		

Publicity

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Major Application	8 September 2022	29 September 2022	East Anglian Daily Times

Site notices

General Site Notice	Reason for site notice: General Site Notice
	Date posted: 8 June 2022
	Expiry date: 29 June 2022
General Site Notice	Reason for site notice: Major Application
	Date posted: 6 September 2022
	Expiry date: 27 September 2022

6. Planning policy

National Planning Policy Framework 2021

SCLP10.1 - Biodiversity and Geodiversity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP10.4 - Landscape Character (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP6.1 - Tourism (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP6.2 - Tourism Destinations (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP6.3 - Tourism Development within the AONB and Heritage Coast (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.2 - Residential Amenity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

7. Planning Considerations

7.1. The application relates to two elements:

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

Principle of Development

7.2. The site currently has permission for 35 pitches under planning consent C/09/0644, however this permission was based on a smaller site area than that currently proposed. The supporting statement notes that the site has been operating above that threshold and on this extended site area for some time without any negative impact. Officers have done some map regression work and confirm that this site area was never included within the golf

course; it has been an historic field boundary since at least 1945. Furthermore the maps show that the area has been used for camping since at least 2007. The reason for restricting the number of pitches was noted as being in the interests of amenity and protection of local environment. The site does lie within the AONB where particular attention should be paid to the special qualities of the landscape. The officer's report for the 2009 application notes that the site is in a well screened location and has been in operation as a campsite since 1989.

- 7.3. The boundary hedgerows are well established, and the overall site area has not changed since that of the 2009 application. The additional pitches will be lost in the landscaping and not visible from vantage points across the AONB. The council's fallback position would be looking at a lawful development certificate in this instance where the applicant could provide evidence that the site has been used above the 35 pitch threshold for over 10 years.
- 7.4. Local policies are supportive of tourism under SCLP6.1, where policy SCLP6.3 Tourism Development within the AONB and Heritage Coast notes that 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;
 - 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.
- 7.5. Furthermore, policy SCLP4.5 supports the growth of the rural economy where the scale of development is appropriate and compatible with the surrounding land uses. The proposed increase in the number of pitches has already taken place and has been in use both before and since the grant of the permission in 2009, so any impact is imperceptible by absence of evidence of any harm or detrimental impact. It also demonstrates that the site is capable of catering for the 70 pitches and so there are no capacity issues. The submitted LVIA and Ecological Assessment draw the conclusions that there will be no conflict with the local plan, which has been validated by consultees responses.

- 7.6. New Tourist Accommodation is addressed under policy SCLP6.5 and whilst this site is not considered to be new, the additional pitches could be perceived this way. Given that the site has already operated above its permitted level there is a clear demand for accommodation on this site. The local plan sets out that a large amount of the district's economy is based on tourism and as such its growth is often welcome where it is correctly mitigated.
- 7.7. The campsite is already in existence and the increase in pitches is not considered to further erode or detract from the AONB, which will be discussed further in this report. The site is abutting the settlement boundary and as such is considered to be within a sustainable location. There are no other residential properties other than those associated with the site which could be impacted by the increase in pitches. Officers do consider that restrictions on how long units can stay at the site are required to ensure that this site remain a true touring site for tourism purposes. Given there is no restriction on timings on the current permission it is deemed necessary to restrict access to the site. Environmental Protection have not raised any concern with regards to residential impact and the new access is located further from the village start. As such it will be better suited to the arrival of guests without resulting in amenity issues.
- 7.8. Similar issues arise from the creation of the new access as that of the increase in pitches. These relate to impact on the character of the AONB, highway safety and residential amenity. There is further detail with regards to the AONB later in this report. There has been a consent for underground cabling which passes through the site, reference C13/0806. The corridor of cabling requires an easement which has been granted for that purpose. The Highways Authority have been consulted and liaised with prior to the submission of this application, and no objections have been raised on the basis of highway safety.
- 7.9. The single existing access to Low Farm serving a multiplicity of uses is located at the very edge of the physical built up part of the village, in the south east corner of the site. The supporting information notes the following requirements for a new access: *"In order to achieve much improved access for the users of the caravan and camping site the existing access needs to be replaced by a dedicated access where it can function safely and effectively. An improvement to the existing access is not possible because of topography and physical obstruction (substation) to achieve requisite visibility splays. Nevertheless, the existing access will still be required for users of the lower section of Low Farm."*
- 7.10. The new access will become the main access for the campsite whilst the existing will be used by the other uses at the site which are set out above (residential dwellings, permanent holiday accommodation and the residue of the farm).
- 7.11. The new access will be further outside the limits of the village and currently this part of the area is relatively undeveloped. The campsite is not visible from the opposite field and creating this access will change that arrangement and effectively bring development further into the countryside and AONB, the impact of which will be discussed below.
- 7.12. In order to improve connectivity it is noted that pedestrians and cyclists will be discouraged from using the new access and directed towards the existing access by the use of continuing existing links within the site.

Flood Risk

- 7.13. This site is within Flood Zone 1 and therefore at the lowest risk of flooding. Major applications such as this are normally accompanied by a Flood Risk Assessment even when in areas at low risk of flooding. However, it would be unreasonable to require one in this case, because although the application site area technically makes it a 'major' the level of physical works on site is relatively small and thus the associated impacts upon surface water run-off and wider flood risk would be negligible. Therefore, there are no concerns regarding flood risk and the submission of a formal flood risk assessment has not been insisted on in this case.

Landscape and Biodiversity

- 7.14. The site falls wholly within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB). The proposal should seek to accord with national and local policies and pay due regard (ref. S. 85 Countryside and Rights of Way Act, 2000) to the statutory purpose of the AONB designation which is to conserve and enhance natural beauty. As such, the proposal should have regard to paragraphs 174 (a) and 176 of the National Planning Policy Framework (NPPF) as the development being proposed is located within a nationally designated landscape which is also a Valued Landscape. Development proposals located within this area should seek to contribute positively to the purposes of the AONB designation and meet the relevant policy objectives in the Suffolk Coast & Heaths Management Plan 2018-2023.
- 7.15. It is established that the site falls within the Suffolk Coast and Heaths AONB and therefore there is an accepted high level of landscape sensitivity. The road frontage hedge has already been compromised by the route of the windfarm cable route which was approved under C/13/0806. Whilst replacement hedge planting has been planted, it will take some time to begin to mature especially because of the prevailing light, sandy soils. The cable route has led to the loss of a section of mature predominantly elm hedging in the same way that a section of elm hedge will be lost through this current proposal. Whilst elm hedging is characteristic of surrounding agricultural fields, much has been lost through historic field amalgamation. In this instance the hedge is no longer a field boundary hedge. It also has to be noted that with a high proportion of elm, the hedge will always be susceptible to Dutch Elm Disease and could be lost anyway. The loss of the proposed 120m. can be mitigated by replacement hedging, as it has been with the cable route, and with a more diverse mix of species it will be more resilient to disease and has the potential to have a long lasting benefit in the landscape. There will be an initial adverse impact on landscape character until the new hedge establishes, but once that happens, in all respects bar the immediate locality of the site, the impact on landscape character will be limited and is considered slight. In the fullness of time the relevance of any impact will be negligible.
- 7.16. In terms of visual impact, there will be initial impacts from the hedge removal but as the replacement planting matures the visual presence of the new hedge will become apparent, and the visual impact will moderate and is unlikely to have any meaningful relevance. Overall this frontage hedge is already compromised by the loss to the cable route. Whilst the proposed further removal is in many ways regrettable, it can be mitigated by the replacement planting which is likely to lead to a more disease-free long term sustainable future. This can be secured through an appropriately worded condition.

7.17. The AONB team have further supported officers' assessment, noting *"While the removal of the existing length of roadside hedge is regrettable and has the potential to open up views into the site, the AONB team recognise that any landscape and visual impacts will be temporary and very localised. The new hedge will also be more species diverse. The inclusion of oak trees will also add structural diversity along this frontage once the scheme establishes. The AONB team welcome that the new hedge will continue from the proposed access junction into the site. This planting will help to soften the visual impacts of the new access within the AONB. The AONB team welcomes that a Landscape and Visual Impact Assessment (LVIA) has been submitted with the application and the team broadly concurs with the findings in the LVIA about the landscape and visual impacts that will arise from the proposal. While the LVIA did not include a section 8 on mitigation, (Section 8 is missing), the AONB team is satisfied that the proposed planting discussed in other sections of the LVIA, in time, will help provide mitigation for the hedgerow removed to deliver the new access and once established will help to conserve and enhance the landscape character and special qualities of this part of the AONB."*

7.18. Paragraph 174 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. The above assessment has set out that whilst the loss of an existing hedgerow is unfortunate it does provide us with the opportunity to replace it with a hardy hedge which provides a longer-term sustainable future. Policy SCLP10.4 seeks to ensure that proposals protect the special qualities and features of the area; paying attention to existing landscape features and skylines. The increase in the number of pitches will not change the overall use of this site which is approved as a camping site. There will be no additional pressures in terms of the existing features on the site other than that discussed above in relation to the new access, which it has been demonstrated can be fully mitigated against. No additional lighting is proposed at this time, and a condition can be added to any consent granted for these details to be submitted prior to their installation. Officers are satisfied that consideration has been paid to the AONB and the application is supported by the council's landscape team and the AONB team.

7.19. The applicant has submitted an Ecology Report (MHE Consulting, May 2022) as part of the planning application. This report includes consideration of impacts on statutory designated sites and should be read alongside this assessment.

7.20. The site is located within 13km of terrestrial European designated sites which include the

- Deben Estuary Special Protection Area (SPA)
- Deben Estuary Ramsar site
- Alde-Ore Estuary SPA
- Alde-Ore Estuary Ramsar site
- Orfordness-Shingle Street Special Area of Conservation (SAC)
- Sandlings SPA
- Stour and Orwell Estuaries SPA
- Stour and Orwell Estuaries Ramsar site

- 7.21. Given the location of the application site and the development proposed it is not considered that there are any construction related Likely Significant Effect (LSE) pathways. Construction activities will be limited to the creation of the vehicle access and therefore will be small scale, with no direct or indirect connections to the identified designated sites. In relation to operational LSE pathways, whilst the proposed increase in pitches is relatively modest and has apparently been operating for a number of years already without any known ecological issues (Planning Statement, Artisan Planning, March 2022), nevertheless it is considered that the increase in recreational uses in the area, particularly in combination with similar increases resulting from other developments, requires further assessment.
- 7.22. The application site is approximately 900m west of part of the Deben Estuary SPA and the Deben Estuary Ramsar Site, which is the closest designated site to the application site. Whilst at this distance and given the scale of the proposed development it is not considered that impacts resulting from construction activities are likely to occur, it is considered that the following impact may occur as a result of the operation of the site.
- 7.23. The development is relatively small and is over 900m (and over 1.1km on foot by public right of way) from the closest part of the Deben Estuary. The campsite only operates between April and September and therefore cannot give rise to any impacts during the winter period when the estuary supports many of its overwintering bird citation features. This can be conditioned to ensure that the site does not operate outside the specified requirements of their ecological report.
- 7.24. It is considered that, due to the type, location and scale of the development, and based on available visitor survey information for the identified designated sites, that the development "Alone" will not give rise to adverse effects on the integrity of any of the identified designated sites as a result of increased recreational disturbance.
- 7.25. The council have undertaken an Appropriate Assessment which concluded that a mitigation package of £1873.78 towards the council's RAMS was appropriate and proportionate. Natural England have been consulted and agree with this assessment. This figure has been paid by the applicants and as such officers are satisfied that the application accords with the principles set out in SCLP10.1 in relation to biodiversity.

8. Conclusion

- 8.1. Officers consider that the proposal to increase the level of pitches from 35 to 70 is acceptable where it would not have any adverse impact on the AONB or biodiversity, which has also been concluded by consultee responses. The council's policies are supportive of tourism facilities where an existing site can be intensified without increasing in area and impacting negatively on the environment. Officers can see no reason to refuse permission.
- 8.2. The fallback was the possibility for the applicants to submit a lawful development certificate given the operation of the site above capacity approved since 2009; the submission of a full application provides the LPA with the opportunity to impose such conditions and obligations on the use that are deemed necessary to control the development.
- 8.3. With regards to the new access, whilst it is accepted that this site has been operating with the one access for some time there is a conflict with other uses on the site. The new access is located within the countryside; however this area has already been disrupted by the cable

routing. A mitigation package has been put forward which has been accepted by the council's landscape officer and the AONB team as a chance to protect and enhance the situation in the long term given the existing nature of the hedgerow. Officers are satisfied with the reasoning put forward and the detail supplied. There have been no objections from consultees and the Parish Councils concerns have been reviewed and conditions recommended to ensure that the new hedgerow is implemented effectively.

- 8.4. This is a comprehensive submission where work has been undertaken prior to submission with the Local Highway Authority to establish suitable and workable solutions with limited impact. A thorough LVIA has also been submitted along with an ecology report, all of which have been endorsed by consultee responses and the councils' officers.
- 8.5. Officers conclude that the proposals accord with the principles set out in the local plan in terms of its landscape and tourism policies and meet the requirements of the NPPF in terms of its setting.

9. Recommendation

- 9.1. Officers recommend that this application is approved subject to the following conditions:

Conditions:

1. The development hereby permitted shall be begun within a period of three years beginning with the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990 as amended.

2. The development hereby permitted shall be completed in all respects strictly in accordance with 4187-02B; 294-001-100revA02; LVIA; Planning Statement received 22.03.22 and Ecology Report (MHE Consulting, May 2022); 4187.02C received 5.4.22, for which permission is hereby granted or which are subsequently submitted to and approved by the Local Planning Authority and in compliance with any conditions imposed by the Local Planning Authority.

Reason: For the avoidance of doubt as to what has been considered and approved.

3. The new access shall not be used by vehicular traffic until it has been laid out and completed in all respects in accordance with drawing no. 294-011-100 A02 with an entrance width of 6 metres. Thereafter it shall be retained in its approved form.

Reason: To ensure the access is laid out and completed to an acceptable design in the interests of the safety of persons using the access and users of the highway.

4. The new access onto the highway shall not be used by vehicular traffic until it has been properly surfaced with a bound material for a minimum distance of 15 metres measured from the nearside edge of the metalled carriageway, in accordance with details that shall have previously been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure construction of a satisfactory access and to avoid unacceptable safety risks arising from materials deposited on the highway from the development.

5. Gates/bollard/chain/other means of obstruction to the access shall be set back a minimum distance of 15 metres from the public highway and shall not open towards the highway.

Reason: To avoid unacceptable safety risks and traffic delay arising from vehicles obstructing the public highway while the obstruction is removed or replaced by enabling vehicles to clear the highway while this is done.

6. Before the works for the formation of the access are commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway including any system to dispose of the water. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway. This needs to be a pre-commencement condition to avoid expensive remedial action which adversely impacts on the viability of the development if, given the limitations on areas available, a suitable scheme cannot be retrospectively designed and built.

7. Before the access is first used visibility splays shall be provided as shown on Drawing No.294-011-100 A02 with an X dimension of 2.4 metres and a Y dimension of 59 metres to the nearside edge of the carriageway and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

Reason: To ensure drivers of vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

8. Proper facilities shall be provided for the storage and disposal of waste material. Such facilities should totally enclose and adequately protect all commercial waste from insect and rodent infestation.

No burning of waste, either liquid or solid, shall be undertaken on site.

Reason: In the interest of health and safety and public amenity.

9. Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Ecology Report (MHE Consulting, May 2022) as submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

10. No removal of hedgerows, trees, rubs, brambles, ivy shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are

appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

11. No later than 3 months after clearance of the existing hedge, full details of a replacement planting scheme shall be submitted to the planning authority for approval. Details shall include hedging and tree species suitable for the prevailing growing conditions and landscape character, plant sizes, planting methodology (including mulching) and protection measures, and maintenance proposals for the first five years after planting. The approved planting proposal shall be implemented in the first autumn planting season after completion of the new access.

Reason: In the interests of mitigating proposed hedgerow removal and maintaining prevailing landscape character.

12. None of the trees or hedges shown to be retained on the approved plan shall be lopped, topped, pruned, uprooted, felled, wilfully damaged or in any other way destroyed or removed without the prior written consent of the Local Planning Authority. Any trees or hedges removed, dying, being severely damaged or becoming seriously diseased within five years of the completion of the development shall be replaced during the first available planting season, with trees or hedges of a size and species, which shall previously have been agreed in writing by the Local Planning Authority.

Reason: To safeguard the contribution to the character of the locality provided by the tree and hedgerow.

13. The number of touring caravans or tent pitches shall not exceed 70 in total at any one time unless otherwise agreed in writing by the Local Planning Authority.

Reason: To help conserve and enhance the special qualities of the Suffolk Coast & Heaths AONB near Waldringfield.

14. The site shall not be used other than for the stationing of touring caravans or tents for use for holiday purposes. Any caravans on the site must be capable of being towed by a motor vehicle on the public highway. No caravan shall remain on site for more than a total of 56 days in any calendar year and all caravans shall be removed from the site when not being occupied for holiday purposes.

Reason: In order that the Local Planning Authority may retain control over this particular form of development in the interests of amenity.

15. The campsite shall operate only between the months of April and September.

Reason: In order to protect any rise to any impacts during the winter period when the estuary supports many of its overwintering bird citation features.

16. No external lighting shall be installed unless a "lighting design strategy for biodiversity" has been submitted to and approved in writing by the local planning authority. The strategy shall:

a) identify those areas/features on site that are particularly sensitive for biodiversity likely to be impacted by lighting and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: To ensure that impacts on ecological receptors from external lighting are prevented.

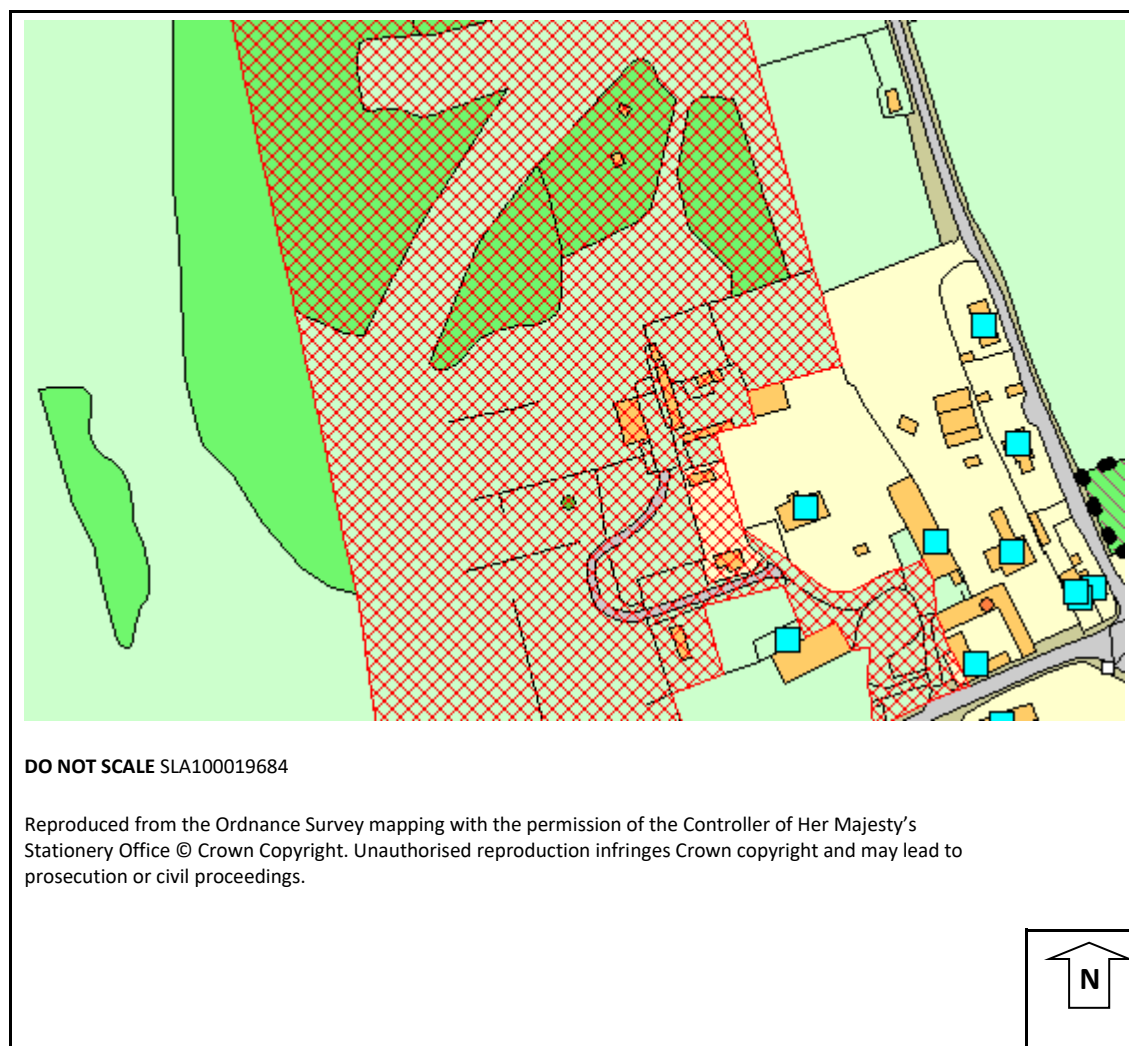
Informatives:

1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.
2. It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority. Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense. The County Council must be contacted on Tel: 0345 606 6171. For further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-and-pay-for-a-dropped-kerb/> or: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/> County Council drawings DM01 - DM14 are available from: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/standarddrawings/> A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.
3. It is unclear whether the development will involve a connection to the mains, or a private water supply. If the development involves connecting to an existing private water supply, or the creation of a new private water supply, advice should be sought from the Environmental Protection Team prior to commencing works. All works undertaken must comply with the Private Water Supplies Regulations 2016 (as amended).

Background information

See application reference DC/22/1117/FUL on [Public Access](#)

Map



Key



Notified, no comments received



Objection



Representation



Support