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Waldringfield Parish Council response to DC/22/0495/FUL | The erection of two light industrial buildings (3 units) and the renovation of existing light industrial units at Chapel Works, Waldringfield Heath. Works to also include landscaping and hard standing for parking. 2 units are to be taken by the applicant M&C Engineering and 1 unit to be taken by Ascenda Engineering | Chapel Works Newbourne Road Waldringfield Suffolk

This site sits within the AONB and because it fronts directly on to the Newbourne Rd is therefore very prominent. It is in effect a gateway to the AONB.

Parts of the site have been used previously (without planning consent) as a demolition yard and it had become an eyesore. The Parish Council would wish to see the site improved but, given its prominent location, we would argue that it is extremely important to ensure that any new development is appropriate, proportionate and sympathetic to this sensitive location within the AONB as well as to the neighbouring cluster of residential dwellings, designated as in the countryside.

We do not feel that this application satisfies fully the requirements of this location and therefore **Waldringfield Parish Council OBJECTS** to this application in its present form for the following reasons.

1) Change of Use

The boundary of the application site has been extended to include an area of land previously within the golf course. This is clearly seen in the applicant's drawing *"Figure 2 Aerial Imagery"*.

We suggest therefore that a change of use application is required before this additional encroachment into the former golf course within the AONB can be included in the site of this application.

Documents not included in the application

The validation list states that these must include:

2) A site location plan, with a red line around the boundaries of the application site, and any other land under the same ownership outlined in blue.

The proposed boundaries of the application site are shown but not the adjoining land owned by the applicant including the golf clubhouse and car park.

3) Other plans such as elevations and floor plans illustrating the existing building(s) and proposed changes and/or new buildings.

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The submitted elevation plans show neither the ridge nor the eaves heights of the proposed buildings (although this is stated in the Design & Access statement 3.02).

There is no detail, other than on the block plan, of the existing units. We suggest that considerably more detail is required to show the extensive remediation works included within the application. This would include the existing buildings and proposed changes to details such as ridge heights, elevations, materials, finishes etc.

4) Lighting Assessment / Details of Lighting Scheme

This is required for all applications for development where the development is likely to result in a material increase in levels of light pollution (for example floodlighting or illumination in the countryside)

There is no lighting plan in this application. We understand from the applicant that night security lights will be solar powered, will be downward facing and will have motion sensors but there is no reference to this within the application. We say that the applicant should provide a lighting plan that is acceptable in this AONB, countryside setting.

5) Drainage Assessment/Trade Waste

There is no reference in the application to the storage and disposal of commercial consumables used in the activities of the existing and proposed workshops - eg storage of waste hydraulic fluid, cutting run-off etc

In addition, we understand from the applicant that the land connecting the existing and the new units will be finished in concrete, with surface water running off to a French Drain system and soakaway. We suggest that this is not appropriate and that a free draining permeable finish to allow water to drain away would be more suitable.

We say that the applicant should provide a fully illustrated drainage plan.

6) Noise Impact Assessment or acoustic report.

Necessary for proposals that generate noise such as industrial and/or commercial developments, for example workshops;

There is no noise assessment with this application. The activities planned for the existing and new units will focus on metal cutting and fabrication. Without approved noise prevention measures and sound insulation of the workshops the level of noise generated will have a significant impact on the adjacent residential neighbours. To help mitigate this we would also suggest that the new units be located further from the road and the adjacent residential neighbours, giving more scope for interspersing planting to help screen these large units and also to reduce the noise impact.

A noise assessment should be provided and approved before taking this application forward, as the proposed activity is likely to be contrary to Policy SCLP4.3d): Expansion and Intensification of Employment Sites as there would be *an unacceptable adverse effect on the living conditions of local residents relating to matters of noise, …*

7) We understand that the proposed hours of operation are 7/8am to 5pm but this is not included in the planning application. We would wish to see a statement to that effect in the application.

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8) The supporting documents to the application contain a number of inaccuracies including the following, not an exhaustive list:

a) LANDSCAPE AND VISUAL APPRAISAL Appendices A – D contain no illustrations - blank pages only.

b) The Planning Statement contains a number of errors, for example:2.1.3 refers to quarry being active etc to give the false impression of an "industrialised" location.

2.2.2 states "The landscape character, general appearance and biodiversity of this part of the AONB are limited by the presence of built development, including this brownfield site, and the continued landscape management and maintenance of the Golf Course."

This is incorrect i) The former golf course has undergone a process of rewilding and is currently managed as such and ii) The lack of activity on this, in part, brown field site means that it is likely to harbour a lot of amphibians such as newts and frogs, toads and snakes together with birds and insects.

2.2.7 "The site lies outside of the defined settlement limit of Waldringfield Heath and is considered as "Countryside" in planning policy terms". There is no "defined settlement limit of Waldringfield Heath". Waldringfield Heath is outside the settlement limit of Waldringfield. It is in the countryside and includes a cluster of dwellings along Newbourne Road, including the area adjacent to the proposed new industrial units.

4.3.1 states proposed location is within Martlesham neighbourhood plan area – this is incorrect – M&C's <u>current</u> location is within Martlesham parish, not the <u>proposed</u> location.

6.1.8 states "In summary, it is considered that the limited impacts of the development, will not outweigh the considerable social and economic benefits of the scheme when assessed against the Development Plan and other relevant material considerations of the NPPF."

The WPC can not find any evidence to support this statement. On the contrary - the applicant has not identified any of these "considerable social and economic benefits" in the application and has provided no evidence to support the need to increase significantly the scale of expansion of the existing commercial site – particularly as this includes part of the former golf course.

There is no indication of how many additional new staff will be employed as a direct result of moving from the current rented site or how the staff and the work will be "distributed" across the proposed and the refurbished units in this application. There is no indication of the anticipated combined employee numbers of the associated company Ascenda Engineering as a result of the move. Do these numbers justify the expansion or will other business be sought to rent the surplus units in order to make a site of this size commercially viable.

9) In addition to all of the above:

The WPC considers that the new boundary treatment of the site does not meet the higher design standards required in an AONB.

The applicant has already erected some boundary fencing and gates made of approximately 1.8m high sheet metal which delineates the road from the AONB. This harsh boundary treatment is not attractive and has the potential to have a greater negative visual impact than the on-site units themselves.

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This fencing/boundary treatment needs to be improved to make it acceptable in this sensitive environment. The plan should include the proposed treatment of the existing brick raised bed and hard standing at the entrance and be submitted as part of this application.

Screening on the remaining boundary appears to rely upon the line of existing hedging. Part of this has been removed to make way for newly installed 3 phase electricity supply to the site. Many other trees on-site have also been removed immediately prior to the application, including a large oak tree on the boundary line. The WPC Tree Warden will be submitting additional comments on this matter.

Waldringfield Parish Council would support an application that was proportionate in size and sensitive to its position in the AONB and to its impact on the residential neighbours.

Whilst appreciating the positive elements such as the refurbishment of the existing units, the cleaning up of the site, removal of rubbish, removal of asbestos, creating a workplace of a good standard etc, the absence of such a significant amount of information identified above means that the WPC **OBJECTS** to this application in its current form.

Kind regards,

J. Shone-Fubley

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