

Additional Submission:

Application No: DC/18/0116/FUL

Location: Church Farm Holiday Park, Church Farm Road, Aldeburgh

Case Officer: Steve Milligan

Proposal: Proposed siting of 34 high quality holiday lodges (static caravans) in lieu of 85 touring caravan pitches together with peripheral and supplemental landscaping.

On behalf of Aldeburgh Town Council, I am writing to object to this planning application which will have a detrimental effect on the whole town. The visual impact of 34 dwellings, occupied as they will be for 12 months of the year, will detract from the neighbouring RSPB reserve and the Area of Outstanding Natural Beauty. The loss of touring pitches will deny visitors the opportunity of affordable holidays which will undoubtedly affect the town's vitally-important tourist trade and could lead to unauthorised, overnight parking by camper vans and caravans.

I note that no Pre-Planning advice was sought from Suffolk Coastal District Council and, similarly, no community engagement was undertaken, including any consultation with the Town Council, Aldeburgh Business Association or neighbours.

It is the Town Council's understanding that if permission was to be sought for an entirely new touring caravan or camper van site on this land, it would be unlikely to be granted:

Development Management Policy DM17 – Touring Caravan, Camper Vans and Camping Sites (SUFFOLK COASTAL DISTRICT LOCAL PLAN CORE STRATEGY & DEVELOPMENT MANAGEMENT POLICIES):

'...New touring caravan, camper van and camping sites will not be allowed within the Heritage Coast, adjoining estuaries, within exposed parts of the AONB, or where they have a materially adverse impact on the landscape....'

Also, from DM17:

'... Where new sites or extensions are allowed, a condition will normally be imposed which requires a break in use of at least 56 days depending upon the local circumstances. Such circumstances would include the location, the exposed nature in winter, or the need to protect adjacent wildlife sites. The use of the site for holiday purposes will also be controlled by condition.'

While this application does not apply to a new site, the changes suggested are incompatible with and directly opposed to the permissions under which the original site layout was permitted and subsequent alterations agreed.

It is disappointing that the retrospective planning permission application - DC/17/2318/FUL dated 22 August 2017 for the "Regularisation of 10 existing concrete hardstandings and the proposed siting of 10 additional concrete

hardstandings” was allowed and no enforcement for this earlier unauthorised activity actioned.

There are a variety of irregularities, contradictions and contentious statements in the various supporting paperwork including the following:

From the applicant’s Application Form:

‘6. Pedestrian and Vehicle Access, Roads and Rights of Way - Is a new or altered vehicle access proposed to or from the public highway? **No.**’

From the applicant’s Planning, Design and Access Statement:

‘4.5. The application proposes the realignment of access roads within the site together with the relocation of the main entrance to an approved access point on the western element of the park.’

Also from the applicant’s PDAS:

4.4. ‘The site is located within an Area of Outstanding Natural Beauty (AONB), Heritage Coast and adjoins a Site of Special Scientific Interest (SSSI) and a Local Nature Reserve. Therefore, the proposed reduction of holiday units together with the inclusion of structured landscaping will be a significant planning gain for the Local Planning Authority.’

ATC rejects this argument. The loss of holiday units will have a negative impact on the prosperity of the town and cannot be regarded as a planning gain. The proposed reduction in car parking spaces is immediately indicative of potentially reduced visitor numbers. In addition, those who wish to holiday in campervans will be pushed to unauthorised sites within the town.

ATC is proud of the broad offering in the town currently available to tourists and visitors.

Closure of the touring caravan site will prevent all mobile home and caravan users from staying in Aldeburgh thus removing the opportunity of an affordable holiday for a great many people upon whom the town depends and welcomes. The diversity of the offering is necessary for the prosperity of the Town.

Strategic Policy SP22 – Aldeburgh - the strategy for Aldeburgh is set within the context of the acknowledged physical and natural constraints. However, these must not outweigh the retention of a balanced, cohesive and socially inclusive community.

‘5.2. It is proposed that the lodges will be subject to a 12-month holiday season to compete with other luxury lodge parks throughout the UK which operate all year round.’

The site is in a sensitive position, close to the RSPB reserve and unspoilt beach and marsh areas and year-round occupation of the lodges will have a negative impact on unspoilt landscape.

Proposed native infrastructure landscaping - the majority of plants and trees considered native to this area are deciduous, as are the poplars that predominantly

form the basis of the north and south boundaries. In winter, structures on the site would be highly visible (DM17).

The height and size of the lodges are considerably larger than a touring caravan and therefore will have a significant permanent impact on views towards and from the RSPB nature reserve, particularly in winter when the trees are not in leaf and wildfowl numbers are at their peak.

From the applicant's Application Form:

11. Foul Sewage - Please state how foul sewage is to be disposed of: **Unknown**

Are you proposing to connect to the existing drainage system? **Yes**

Should this Application succeed, the area would, in effect, cease to be temporary holiday accommodation and become permanent housing.

Development Management Policy DM18 – Static Holiday Caravans, Cabins and Chalet Parks for chalets and static caravans make an important contribution to the overall provision of tourist accommodation in Suffolk Coastal. They also make an important contribution to the local economy.

However, they can have a marked visual impact on the landscape, particularly those sites set out in regimented patterns in open countryside, and on the coastline. *This impact is compounded, in that they are present on an all-year-round basis. It is therefore, important to direct their provision away from the more sensitive locations within the district.*

In recent years there has been a significant increase in the quality of cabins and chalets available, while satisfying the definition of what a caravan is under the Caravan Sites and Control of Development act 1960. It is important that this type of accommodation is not abused and used as permanent accommodation. To address this, the Council will restrict the length of occupancy periods permitted.

Development Management Policy DM18 – Static Holiday Caravans, Cabins and Chalets In respect of sites for static holiday caravans, cabins, chalets and similar accommodation, proposals for new sites, extensions to existing sites, and intensification of use of existing sites (by infilling) will be acceptable where: (a) the road network is able to accommodate the volume of traffic generated without having a significant adverse impact on the free flow of traffic and highway safety; (b) *they are of a scale appropriate to the nature of the location and its setting. In this respect the cumulative impact will also be a material consideration;* (c) *they are of a high standard of design;* (d) *they are to be used as holiday accommodation only, and not for permanent residential accommodation;* and (e) *there are services available (i.e. the provision of mains water and adequate sewage/waste disposal.*

The above sites will not be allowed within the Heritage Coast, adjoining estuaries, within exposed parts of the AONB or where they would have a material adverse impact on the landscape.

Where planning permission is granted, a condition will normally be imposed to ensure that no holiday unit on the site shall be occupied by the same person(s) for 56 days or more in a calendar year.

In effect, the applicant is asking for planning permission to build 34 bungalows for year-round occupation in a sensitive and beautiful part of Aldeburgh, to the detriment of the town's vitally-important tourist industry.

This application should be refused.

Councillor Jocelyn Bond
Mayor of Aldeburgh