

APPLICATION FOR PLANNING PERMISSION WITHOUT COMPLIANCE OF CONDITION(S)

DC/22/0330

Proposal: Application under S73 for Removal or Variation of Condition following grant of Planning Permission B/14/00412 dated 03.10.2014 Town and country Planning Act 1990 - To vary Condition 3 (Operation of the Site) – To allow camping to take place all year round.

Location: Land West of Alton Water Visitors Centre Holbrook Road Stutton

Further to your letter of 12 August, we submit the following comments in relation to the above proposal. Please note that this response is submitted by the Stutton Neighbourhood Plan Working Group.

You should be aware that a Neighbourhood Plan has been prepared for the parish of Stutton. We can confirm that the Regulation 16 Submission Draft Stutton Neighbourhood Plan has been formally submitted to Babergh District Council. This plan, together with supporting documents, including the Stutton Landscape Study, referred to below, are available to view on www.stuttonvillage.net.

We would urge the local planning authority to take full account of this draft plan, which has been informed by statutory agencies and independent reports including the Stutton Landscape Study. Importantly, it has been developed in consultation with local residents. This response has been informed by that consultation.

The Neighbourhood Plan states on Page 72 Paragraph 8.6

“It is important that people from outside the locality can enjoy the peaceful and nature-rich environment of this area for their own well-being and to help the economic health of the locality. However, tourism and leisure development can have a significant adverse impact on the landscape and on residents, and indeed spoil the landscape and nature people want to enjoy. Guidance notes in the Suffolk Landscape Character Assessment for ‘Plateau Estate Farmland’ and ‘Ancient Estate Farmland’ (which make up much of Stutton’s landscape character) state that ‘effective design and mitigation measures will be vital “to minimize adverse visual impact from leisure developments, and the impact on the character of the landscape both directly and indirectly may be highly significant”. The Stutton Landscape Study states that “further intensification of visitor and tourist facilities or accommodation at Alton Water could have visual impacts as well as impact the prevailing tranquillity. Direct and indirect impacts should be considered carefully. Appropriately designed belts of vegetation must be used to assimilate and screen views from the village edges.”

We draw your attention to Chapter 7 Paragraph 7.20, Page 49. This addresses the landscape issues in the area where the camping site is located and which should be taken account of when considering this planning application.

FCA2: Fringe Character Area 2

“Further intensification of visitor and tourist facilities or accommodation at Alton Water could have visual impacts as well as impact the prevailing tranquillity. Direct and indirect impacts should be considered carefully. Appropriately designed belts of vegetation must be used to assimilate and screen views from the village edges”

In addition, Policy SN14 Visitor and tourist development has direct relevance to this application (Page 71)

Developments that provide facilities or services for the visitor or tourist will be supported, provided that they:

- *would not have an adverse impact on the integrity of the Stour & Orwell Estuaries SPA and Ramsar site from the development alone*
- *demonstrate that they would conserve and enhance the landscape, heritage, character and appearance of the area*
- *would not have an unacceptable impact on the local highway network and would provide adequate parking provision be of a scale and design that is sensitive to the character of the landscape and heritage of the area; and*
- *would not have an unacceptable adverse impact on nearby residential or other uses*

It is our view that the provision of the camping site is broadly consistent with this policy. However, we have serious concerns that the removal of this condition, as proposed in this planning application, will result in several adverse impacts. These are addressed below.

Wildlife

It is likely that this development will have an adverse impact of wildlife if the camping site were to open all year round. In determining this planning application the planning authority should fully assess and consider what these impacts might be.

We believe that an impact appraisal obtained through a Habitats Regulations Assessment should be undertaken

Landscaping

The Neighbourhood Plan (Page 72. Para 8.8) states *“There is also concern from residents that the visual impact of the campsite has insufficient mitigation through hedge or tree planting and unacceptable light spill from the shower block (even when the site is closed) adversely affects the character of the night landscape (see Landscape Study – Fringe Character Area 2 – Management Objectives)”*

We question, does the proposed variation to the Condition 3 conserve and enhance the landscape, heritage, character and appearance of the area and does it have an unacceptable adverse impact on residents nearby? These are key factors that must be considered when determining this planning application.

It is our considered view that to operate the campsite all year without revisiting the screening and landscaping would be negligent. It should be noted that the current landscaping scheme does not screen the campsite. This suggests that Anglian Water has failed to properly take into consideration the visual impact of the site and to invest adequately in appropriate screening. We question whether or not the existing planting scheme will ever screen the campsite. It should be realised that

vehicles and caravans with their sharp outlines, paintwork and reflective surfaces directly contrast with the soft muted colours of the fields, trees and planting in this rural setting. It is essential therefore, that proper screening is in place to hide this visual intrusion.

In the first instance the planning authority should establish if the approved planting scheme and other related conditions listed below have been fully complied with.

- **Condition 11 ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING SCHEME**
- **Condition 12. ON GOING REQUIREMENT OF DEVELOPMENT: TIMESCALE FOR LANDSCAPING and**
- **Condition 13 ACTION REQUIRED PRIOR TO FIRST OCCUPATION: LANDSCAPE MANAGEMENT PLAN**

The need for effective screening is of even greater importance if the campsite were to open in winter, as there are concerns that the current landscaping will be even less sufficient to screen the campsite. As a number of plants are deciduous, they will lose their leaves and decrease the screening. In order to mitigate this, consideration should be given to planting trees and including evergreen varieties.

We consider that expert opinion on the adequacy of this existing planting scheme, together with how it will perform in the period in which it is currently closed, should be sought and be fully taken into account when considering this planning application to vary Condition 3.

Light pollution

Light pollution is a further visual intrusion that needs to be dealt with. As dusk will fall earlier in the winter months, the lights will be on for a much longer period and, therefore, increase the visual impact upon neighbouring houses and the tranquil setting of the reservoir and its grounds beyond. Of particular concern is the toilet block. Its illumination is very bright indeed and already poses a considerable visual intrusion.

Consultation undertaken as part of the developing the Neighbourhood plan records specific resident concerns (Page 74) *“There’s light flooding out of the Alton Water campsite shower block (particularly the open sink facility) through the night and, absurdly, even when the site is closed during winter. They don’t seem to use movement sensors or good downlighting to reduce light spill, and there isn’t the planting to mask this light pollution”*

We are mindful that Condition 8 of the Decision Notice by Babergh on B/14/00412 required that:

“There shall be no means of external illumination installed at the site other than for the WC/shower block which must be controlled on a timer or motion sensor (details of which must be submitted to and agreed in writing by the Local Planning Authority prior to the approved use commencing with the approved details being used thereafter).

Reason - In the interests of amenity to reduce the impact of night time illumination on the character of the area and in the interests of biodiversity. As supported by Policy CS15 of the Babergh Core Strategy.”

It is requested that

- **the local planning authority be satisfied that condition 8 B/14/00412 has been fully complied with and in addition and**

- **should the local planning authority be mindful to approve this planning application, a full lighting appraisal be required which should recommend remedial action to effectively reduce light pollution in this sensitive landscape area and take full account of the its impact throughout the year .**

Stutton Neighbourhood Plan Working Group