

DC/25/1755/P4BC Application for Prior Approval of a Temporary Recreational Campsite under Schedule 2, Part 4 Class BC of the Town and Country Planning (General Permitted Development) (England) Order 2015 - The Street, Walberswick

The Walberswick Parish Council would like to continue to **OBJECT**, in the strongest terms, to the proposed application for prior approval permission related to the case number above.

Walberswick Parish Council refer to the additional information which has been added to the above application file between 30 September and 31 October. Outlined are the Council's views in the light of this new information. The summaries below should be read in conjunction with the original objection.

We would wish to emphasise that whilst flooding and nature conservation issues are prominent in the General Permitted Development Order (GDPO) requirements for considering this matter the National Planning Policy Framework (NPPF) is also specifically mentioned, therefore the issues of nearby residents' amenity; landscape impact; and traffic movements must be given equal consideration as material planning considerations.

1. Flooding issues

The amended site plan still shows part of the proposed site within flood zones 2 and 3. The original flood risk assessment submitted by the applicant is incomplete, and has not been updated, the prior approval application does not include all the information required by the General Permitted Development Order and thus cannot be determined.

- It does not contain the required sequential test; therefore, the exceptions test is not established.
- Additionally, the warning and evacuation plans are unclear and confusing. Egress from the site is proposed **through** significant flood risk zones.

The NPPF makes clear the application should therefore be refused.

2. Impact on the amenities of receptors of the site including neighbouring residents

Notwithstanding the suggested reduction to 30 pitches the use of the site will still cause noise and loss of tranquillity. The proposal is contrary to para 198 NPPF as in our view it will destroy the tranquillity of the area, and the application should be refused.

3. Impact on the habitats and species in designated sites

There are outstanding issues relating to the Habitats Regulations Assessment / Appropriate Assessment (HRA) and ecology.

The preliminary ecological report the shadow HRA refers to, is not on the planning portal, so we are not able to assess the adequacy of surveys and mitigation, particular for some protected species

The HRA report is based on the original proposal of 50 pitches and toilet / washing facilities location. The revised proposals have these facilities nearer to the Protected Site boundary. The HRA assessment is procedurally flawed being based on the wrong proposal information and the conclusions are in doubt.

There remains no quantitative assessment of whether qualifying species of the Special Protection Area (SPA), might be impacted.

The use of the site *is* shown (through the East Suffolk HRA) to cause 'likely significant effects' on the European Sites and RAMSAR due to increased recreational pressure. However, it severely underplays the disturbance likely from the activities of campers on the site through noise; light pollution; traffic movements; and general outdoor activity such as ball games, kites etc.

The specific application related mitigation proposed through a Recreational disturbance Mitigation Strategy (RAMS) payment is not specified. If a payment is taken it must have a use to provide mitigation to alleviate the 'likely significant effects'. Without anything specific being implemented harm will be caused. The detailed mitigation needs to be scrutinised for its effectiveness. It has not been.

The increased recreational pressures will cause adverse effects on the SSSI. NPPF para 193(b) is relevant to the SSSI and indicates the application should be refused. NPPF paras 193, 194 and 195 all indicate refusal.

4. Landscape impact

The note that only 30 pitches are to be involved makes little difference to the impact. The site boundary still specifically includes the higher land. Visual impact on the setting of the Conservation Area is still harmful to it. The site is in the National Landscape area and views to and from the beach and reedbeds are compromised. Both landscape and visual receptors of the development will be adversely affected by the proposal.

It is thus contrary to paras 187, 189 and 191 of the NPPF and the application should be refused.

5. Impact from vehicles

The proposed access arrangements are unchanged. The junction of the unmade single-track access and the main street is already congested being the main access to the Cliff Field car park, to add a large number of additional vehicle movements at the busiest time of the year is unsafe.

The proposal will create unacceptable highway risk and is contrary to paras 109, 115, 116 and 117 of the NPPF and the application should be refused.

Summary

In summary the **OBJECTIONS** of the Parish Council to the application are:

1. The East Suffolk HRA considers there *are* likely significant effects from the proposal, although we believe the onsite activity and therefore the impact on the surroundings have still been underplayed. The physical mitigation measures proposed are inadequate, and the use for the RAMS payment is not specified, so its effectiveness is impossible to ascertain

2. The proposal would be contrary to the NPPF in relation to a number of important issues (including traffic movement; amenities of neighbours; and landscape impact) and it should therefore be refused.
3. Because the flood risk assessment submitted by the applicant is incomplete the prior approval application does not include all the information (particularly the potential for other sites to be used) as required by the General Permitted Development Order and thus cannot be determined.

Original Objection Response

The Walberswick Parish Council would like to object, in the strongest terms, to the proposed application for prior approval permission related to the case number above.

The objection is based on the grounds of public safety, vehicular access, health and safety, impact on the environment, amenity and flood risk.

1. Public Safety and Vehicular Access

Despite the statements in the application, the site is poorly located for the purpose of creating a recreational camping ground.

First, it is incorrect for the applicant to state that there is "existing vehicular access".

Rather, the site can only be accessed by a restricted byway on an unmade track which is the heavily used footpath that connects the centre of the Village (including the Village Hall, Tea Shop, Pub and shops on the Green) to the Walberswick beach.

As a restricted byway, cars should not be allowed access, although permitted access is given on a very limited basis for a small number of cars that park

long-term at the small seasonal caravan site and the other temporary tent campsite (17 pitches) that park in the area where the proposed 50 pitch campsite is proposed.

It is inconceivable to allow any additional vehicular access down a footpath during exactly those months that

thousands of families use this to access the beach and thousands of walkers use this to access the Village.

Moreover, this unmade track ends where the Village's Jubilee Green, the Village Hall and a separate gravel track to the Cliff Field Parking area all meet.

As that track to the Cliff Field parking area is a narrow track suitable for only a single vehicle, it is common for cars to back up down past the Village Hall, blocking any vehicular access to the restricted byway.

If a camping site were permitted down that restricted byway, the traffic safety issues which already exist at

busy times would become monumental with extreme danger to pedestrians (especially children and people with limited mobility) and with the high probability of creating a gridlock situation where cars would be unable to exit or enter the Cliff Field Car Park.

This would have a very negative impact on the ability of day visitors to come to Walberswick.

There is no public overnight parking anywhere in Walberswick so even if the campers were to walk everything into the proposed campsite, there would be nowhere to accommodate the associated cars.

Should the campers decide to park illegally overnight in the beachside Cliff Field Parking Area, police may be called out nightly for trespassing violations.

For these public safety and vehicular access reasons alone, allowing an additional camping site in that area cannot be accepted.

2. Health and Safety Concerns:

Toilet facilities

The application allows for putting in chemical toilets to accommodate the 50 pitches.

However, this site already hosts 4 portable chemical toilets placed on it to serve the existing 17 pitches for tent camping used on an adjacent area for up to 42 days over the summer holidays.

Therefore, this application would require at least another 8 chemical toilets (for 50 pitches) in the same site (for a total of 12 portable toilets) which would create an overcrowded, unsanitary and unpleasant visual and olfactory situation not only for the campers, but for the thousands of walkers who pass the site, for the neighbouring homes and the existing caravan park users.

Moreover, as mentioned above, this large number of chemical toilets would require servicing by more vehicles adding additional traffic to the restricted byway, creating an ever more hazardous road situation for all concerned.

Refuse disposal:

As with the toilets, the application claims that there are already refuse bin collection at the site twice a week.

This collection, however, is for numbers that are less than half of what is being proposed to be added by this new campsite in the same location.

This would imply that at least 6 industrial bins would need to be located in this same area further

eroding the safety and amenity of the area for all concerned.

3. Noise and Light spill to the Conservation Area and threats to Residential Amenity

The site sits directly adjacent to conservation areas (SSSI) that is highly protected for the habitat they provide to wildlife.

The additional noise, light and waste of what would, in effect, be a minimum additional 100 people inhabiting this small otherwise quiet and dark wildlife corridor between caravan site and housing will have a strong detrimental impact on the protected habitats.

In addition, the crowding in of so many chemical toilets, refuse bins, and outdoor food preparation would likely attract vermin to the area. This, in combination with potentially dozens of dogs at the site, will clearly be an additional threat to the native wildlife.

Overall, the crowding, noise, light spill, and potential anti-social behaviour will have a serious detrimental impact on the amenity of the houses adjacent to the proposed site, the caravan users and

walkers using the adjacent footpaths to the beach and those connecting to the larger area.

4. Flood Risk

The proposed site is located within a zone of flood risk.

Therefore, in addition to all the reasons stated above on which the application should be rejected, a full flood risk would need to be undertaken before any further consideration.

Any proposals for evacuation would have to take into account the lack of access set out above.

In summary, the proposal must be rejected as highly inappropriate.

It would create a dangerous overcrowding that threatens the health and safety of residents, beach users, existing campers

and the thousands of visitors to Walberswick who comes for the village's clean beaches, abundant nature, dark skies and quiet enjoyments.

It would have a negative impact on the protected SSSI and raises flood risk concerns.