

## **FPC comments to Planning Application SDNP/22/03837/FUL**

Fittleworth Parish Council objected to the previous similar application on the adjacent site because we were concerned about noise disturbance, visual impacts, trip generation and the overall urbanising effect of the previous proposals.

Given that two years have elapsed since that unsuccessful application, it is therefore extremely disappointing to find our concerns have not been addressed within the current proposals and, following a full Parish Council meeting that was well attended by local residents, we find ourselves having to OBJECT to this application too.

Our reasons are set out below. Despite these concerns, we as a Parish are generally supportive of rural tourism that allows people to come and experience the special places that we are lucky enough to call home. This includes low impact camping on appropriate sites, but we do not think that the current proposal can be described as such.

However, we would be happy to engage in a positive conversation with the applicants to find a suitable alternative site that can be made to work without any of the attendant impacts identified below. We also note that the Barlavington Estate do not seem to have progressed their Whole Estate Plan beyond the initial consultation and it may be appropriate for any future proposals to be framed within that structure.

So whilst we have no in-principle objections to the proposal for a campsite, our reasons for objecting to the application as currently framed are as follows:

1. Noise. The new site is now even closer to our village and only 200m away from resident's houses in Tripp Hill. The application does not include any assessment of the likely noise impact of this type of camping site (for example drawing on evidence collected at other sites run by the same operator) and the short 'amenity' section within the Planning Statement simply seeks to assert that the relatively narrow tree belt between the site and the nearby houses will sufficiently reduce noise levels. This is not a credible position.
2. Landscape Impact. Although it is appreciated that the current proposed site is now relatively better enclosed, the LVIA does not give us sufficient confidence that there will be no harmful visual impacts when the site is viewed from key vantage points in our Parish. The LVIA mentions at para. 3.16 that the Zone of Visual Influence (ZVI) has been derived from the Zone of Theoretical Visibility (ZTV), which is normal. However, the extent of the ZTV is not illustrated within the LVIA, and the ZVI shows a very small area around the southern end of the access track as being visible in the public domain (since it falls along a PROW). It is also apparent that the LVIA relies on the screening of deciduous trees, even though the proposal includes for permanent year-round structures.  
This is not sufficiently robust. We suspect that the ZTV will extend well into our Parish and we would have therefore expected the consultants to have carried out a robust assessment of potential viewpoints that fall within the ZTV. This has not been done.

In addition, no assessment has been made of the likely visual impact arising from the extensive woodburning proposed to be carried out, proposed both as a heating source for hot water and in campfires. As well as a good deal of wood smoke, this will create an impact on dark night skies that has simply not been assessed in the application.

3. Highways. Again, we find that the application is not accompanied by any form of assessment of the likely transport impacts of the proposal. This needs to be remedied before we feel happy that the proposal will not add to the extensive traffic issues that we experience in our village, both in terms of volume and speed of motorbikes, cars and HGVs. We also note that the LHA asked for further information on trip generation to be submitted and find it difficult to understand why this has not been addressed.
4. Rural Character. We are concerned about the urbanising effect of the design and the amount of permanent structures on the site, and do not think that sufficient justification has been made for why they are needed, in preference to moveable amenities that can be removed from the site at the end of each season. We are also concerned that the number of pitches is relatively small on this large field, and that this would open the door to further growth and expansion on the site.
5. Ecology. Residents who live near to the site report that they regularly see large herds of Roe Deer near to the site, as well as a good number of birds of prey. We are therefore concerned that the introduction of a more intensive activity into this site will tend to push the wildlife away from the important habitats found within the Ancient Woodland that surrounds the application site. We do not think that this impact has been properly considered within the submitted information.
6. Fire Safety. We note that it is proposed to burn wood in both campfires and in order to heat water. Given the extremely dry summers we have been recently experiencing, this seems to be inviting the potential for wildfires within the Ancient Woodland and given the lack of mains water supply, we are not sure how any fires would be prevented from spreading. This year, we had to have three fire tenders attend a wildfire started by a disposable BBQ on Hesworth Common, in Fittleworth – and so we are conscious of the potential damage that inappropriate lighting of fires can cause in such precious ecosystems.
7. Security. A number of residents have highlighted concerns about how an increased level of activity in the area could create potential for crime and anti-social behaviour.
8. Best and Most Versatile (BMV) agricultural land. With reference to the 2017 DEFRA mapping ([link below](http://publications.naturalengland.org.uk/publication/6056482614804480?category=5208993007403008)) showing the likelihood of BMV Land in the London and the South East region (ALC019), it would appear that the site in question has a high likelihood of being BMV land. We would therefore question whether, in the current climate, this is the best use for such land, and would prefer to see this type of use placed on land that is less useful for agricultural purposes.  
<http://publications.naturalengland.org.uk/publication/6056482614804480?category=5208993007403008>
9. Lastly, we note that the site lies within the Sussex North Water Supply Zone, where there is an expectation that development will achieve water neutrality. We also note that Natural England have raised concerns about the validity of some of the conclusions of the Water Usage Calculations, which rely on a large percentage of people using the camp site being drawn from within the Supply Zone.