

LAND AT FINESHADE WOOD, TOP LODGE, FINESHADE, NORTHAMPTONSHIRE, NN17 3BB

**Change of Use of Land to a Camping/Glamping Site and Ancillary
Wardens Accommodation**

Planning Supporting Statement

PPS 1217
Fineshade Wood
FV1
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REPORT

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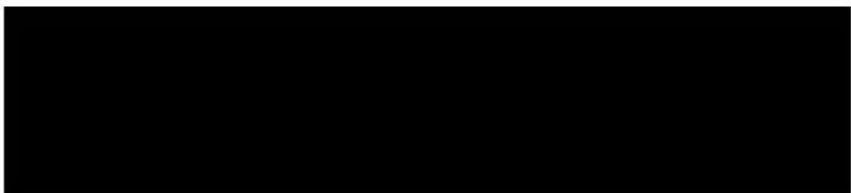
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Contents

1	INTRODUCTION	5
	Application Site & Surrounding Area	6
2	BACKGROUND AND APPLICATION PROPOSALS	7
	Planning History	7
	Pre-application Advice.....	8
3	THE PROPOSED DEVELOPMENT	10
4	NEED FOR DEVELOPMENT	12
	National Tourism Contribution	12
	The Supply of Tourism Accommodation	13
	Benefits to the Local Economy	14
5	PLANNING POLICY CONTEXT	16
	Development Plan	16
	Joint Core Strategy 2011 – 2031 (Adopted 2016).....	16
	Rural North, Oundle and Thrapston Plan	17
	Draft East Northamptonshire Local Plan Part 2	18
	Other Material Considerations.....	19
	National Planning Policy Framework.....	19
6	MAIN CONSIDERATIONS	21
	Principle of Development.....	21
	Sustainability.....	21
	Highway Safety and Accessibility	22
	Impact on Local Landscape.....	23
	Residential Amenity	23
	Ecology	24
	Flood Risk.....	24
	Heritage	24
7	SUMMARY AND CONCLUSIONS	26

Figures

- Figure 1 Site Location Plan
- Figure 2 Site Layout Plan

Appendices

- Appendix A Parliament Tourism Briefing Paper September 2019
- Appendix B Tourism Alliance – UK Tourism Statistics 2019
- Appendix C ONS Travel Trends 2019
- Appendix D Visit England Tourism Factsheet 2018
- Appendix E Pitching the Value: Economic Benefit Report 2019
- Appendix F Visit England: All Trip Purposes 2019
- Appendix G Visit England: Covid 19 Consumer Weekly Tracker
- Appendix H Visit England: England Occupancy Survey May 2020
- Appendix J Deloitte Tourism: Jobs and Growth 2013

1 INTRODUCTION

- 1.1 This Statement has been prepared by RPS on behalf of our client, Donna Barney, in support of a full planning application for the change of use of land to a Camping Glamping site and Ancillary Wardens Accommodation at land at Fineshade Wood, Top Lodge, Fineshade, Northamptonshire, NN17 3BB ('the application site').
- 1.2 This Statement seeks to demonstrate that the proposal is acceptable having regard to key planning policy and other material considerations.
- 1.3 In addition to this Planning Statement, the other supporting documents accompanying the application submission comprise:
- Site Location Plan
 - Site Layout Plan 1217-0006-08
 - Arboriculture Impact Assessment
 - Preliminary Ecology Report
 - Ecology Reptile Report
 - Heritage Statement
 - Flood Risk Assessment
 - Conceptual Foul and Surface Water Drainage Strategy
 - Landscape and Visual Assessment
 - Noise Impact Assessment
 - Transport Statement
- 1.4 The remainder of this section describes the application site and its surroundings. Section 2 of this Statement describes the planning history of the site and provides an overview of pre-application discussions held with East Northamptonshire District Council. Section 3 describes the application proposals Section 4 demonstrates the need for the development in a national and local context. Section 5 briefly reviews the Development Plan and other relevant policies. Section 6 assesses the overall proposal against relevant planning policies and other considerations. Section 7 provides a conclusion to this Statement.

Application Site & Surrounding Area

- 1.5 The site is located within the open countryside, resting approximately 650m east of the A43, opposite the Forestry Commission Offices. The site has an area of 2.48 hectares and covers a section of currently open grassland. It is situated approximately 11km north east of Corby, 18km west of Peterborough, and 10km south of Stamford. Vehicular access to the site is via an unnamed road off the A43. There are no bus stops near the site.
- 1.6 The site is currently greenfield, which is fenced off and contained by trees on the southern and western edges. The north and eastern edges remain open. The Stamford Caravan and Motorhome Club Site can be found approximately 70m to the north of the site. The wider site surroundings mainly occupy the Fineshade Wood.
- 1.7 East Northamptonshire's Local Plan interactive policy map indicates that the site is situated within the countryside and is washed over by the following designations: Area of Tranquillity; Rockingham Forest for Life; and, Community Services and Facilities. The Environment Agency Flood Map for Planning indicates the site is fully located within Flood Zone 1, meaning the site suffers from the lowest probability of flooding. Immediately to the north of the site is the Grade II listed Top Lodge (Historic England reference: 1040114) with attached barn and granary, outbuildings and shelter sheds.
- 1.8 There are no other known designations within close proximity of the site.

2 BACKGROUND AND APPLICATION PROPOSALS

Planning History

- 2.1 A desk based examination of the Council's public access planning search facility reveals no approved planning decisions for the site. As such, the site should be considered as greenfield land. The site does have a short planning history by way of refused and withdrawn planning applications.
- 2.2 Planning reference 12/00990/FUL proposing the "Erection of building for agricultural storage" was refused in August 2012.
- 2.3 In September 2014, planning reference 14/01195/FUL was refused which proposed "Change of use to lodge camping facility including 30 'glamping' pods, car park, warden's residence, reception, welfare building and associated works". The application was withdrawn following advice from the Council that the application would be refused on grounds of insufficient information.
- 2.4 Planning reference 15/00584/FUL proposing "Change of use to tented camping including associated car parking and a welfare building" was withdrawn in May 2015.
- 2.5 RPS previously submitted planning reference 18/02428/FUL on 19th December 2018 for the "Change of use to timber lodge holiday park and the development of ancillary infrastructure and landscaping". The application was withdrawn following confirmation from the Case Officer that the proposal would be recommended for refusal. The refusal reasons were documented on a draft committee report, and can be categorised as follows:
1. Unacceptable countryside development
 2. Adverse visual impact on landscape, and disturbance to local tranquil character
 3. An unacceptable impact on protected species found on the site
 4. Adverse impact on the setting of the Listed Building 'Top Lodge' and
 5. A poorly located residential development, resulting in highways safety issues at A43 junction as well as along the access road.
- 2.6 It is understood that the material issues noted above would need to be addressed in any subsequent and similar application.
- 2.7 In the section below, we set out the we elaborate on the benefits of the new, refined and smaller scale holiday development proposal that have resulted from a pre-application enquiry with the East Northamptonshire District Council, and comment where appropriate on how it can address the refusal reasons noted above.

Pre-application Advice

East Northamptonshire District Council

- 2.8 Formal pre-application advice was sought from the Council on the 21st January 2020 on the basis that application reference 18/02428/FUL was inappropriate, and a significantly refined and lower impact development proposal for camping and glamping could be supported by officers.
- 2.9 Following a meeting with the Council on 28th February 2020, a formal response was received on 16th March 2020 under pre-application reference 20/00018/QRY. The advice has confirmed any subsequent application would be assessed against the statutory development plan which comprises the adopted North Northamptonshire Joint Core Strategy (2016); Rural North, Oundle and Thrapston Plan (2011); and various SPD's.
- 2.10 The Council's pre-application enquiry response put forward that the key issues of a revised application for a glamping and camping site would relate to matters of: principle; impact upon the character and appearance of the area; impact upon residential amenity; access and impact on highway safety; ecology; and, flooding.

Principle

- 2.11 The Council confirmed the site is within the open countryside and therefore development would be resisted unless a specific exception is met. In this regard the proposal is for tourism development, and Policy 25 of the North Northamptonshire Joint Core Strategy sets out a business plan would be required to demonstrate how the proposal would reach out to tourist interest.
- 2.12 The Council's response builds on this, and sets out that justification in the form of a tourism business plan would satisfy the Local Planning Authority that development could be located within the open countryside. Once this has been provided and agreed, the principle of a tourism development could be established.

Impact on Character and Appearance of the Area (Heritage)

- 2.13 The Council has confirmed that the site lies at the head of the sensitive Rockingham Forest character area, and immediately to the south of the Grade II Top Lodge listed building. The Pre-application response is clear that an application would need to demonstrate that no harm would be caused to the identified heritage asset, as it is unlikely that there would be any public benefit to outweigh less than substantial harm, or substantial harm, to the asset.
- 2.14 At the pre-application meeting, the prospect of using the land to the south of reference 18/02428/FUL was explored. The Case Officer confirmed that, because the lack of windows on this side of Top Lodge would mean the site could be invisible to the heritage asset. The natural topography of the land was also discussed, and it was confirmed that the site slopes down significantly from the north to the south. This means that, if units can be shielded from sight by utilising the natural topography, it is possible that they will not have a physical presence. The case officer set out that if the units were invisible to the asset, then it is likely that there could be no harm.
- 2.15 The pre-application response sets out the proposal would need to be designed in accordance with Policy 8 of the JCS that requires development to be in keeping with the character of an area,

to be of an acceptable design, to have acceptable access and parking arrangements and not to have an unacceptable impact on the amenities of neighbours. The proposal must also take into account the sensitive nature of the locality being adjacent to a Grade II listed building; therefore Policy 2 of the JCS in relation to the historic environment is relevant.

Impact upon Residential Amenity

- 2.16 There are a small grouping of residential buildings within approximately 120m of the site to the east. Noise disturbance associated with guests using the campsite are recognised as likely to have the greatest impact upon existing residents in the area. As discussed in the pre-application meeting, the development would need to be designed in a manner that causes no significant impacts to neighbouring amenity in terms of layout, orientation, scale, form and noise. Further, many public consultations submitted in objection of application reference 18/02428/FUL noted that noise and other disturbance would be likely, and unpoliced. On this, it is proposed that a site wardens lodge be stationed on the site to ensure appropriate and conscientious use of the site.
- 2.17 It was confirmed with the case officer that this scheme could be designed to be acceptable in terms of its impact upon neighbouring residential amenity, and subsequently considered in accordance with Policy 8 of the North Northamptonshire Joint Core Strategy 2016. It was agreed that this is likely to be possible if the development is contained to the southern part of the area, and to the western edge of the northern field.

Access and Impact on Highway Safety

- 2.18 The withdrawn planning application (Ref: 18/02428/FUL) highlighted highways issues that would need to be addressed as part of this application. These include hazards at the present junction of Top Lodge Road and the A43 due to the likely intensification of the access carriageway.
- 2.19 As discussed in the pre-application meeting, this scheme will propose a lower impact development that is presents a less intensive use of the land and will subsequently have a significantly lower impact on the local highways.

Ecology

- 2.20 The Officers Report for the withdrawn planning application (reference 18/02428/FUL) cited that the Council had concerns with ecology due to the detrimental impact upon wildlife within the application site.
- 2.21 This matter was discussed at the pre-application meeting. It was determined that a full ecology survey/report would need to be submitted alongside this planning application. The Local Planning Authority would need to be satisfied that there would be no harm to protected species and that an enhancement in biodiversity would be achieved.
- 2.22 Again it was determined that it would be beneficial if the southern part of the site was utilised for camping and stationing units, as it is more shaded, and likely contains less biodiversity (which would be confirmed in Ecological reports). This direction simultaneously offers an opportunity to utilise sections of the northern part of the site for biological enhancement, that would result in an increase in biodiversity.

3 THE PROPOSED DEVELOPMENT

- 3.1 The development proposal is for the change of use of land to a camping and glamping site, and associated wardens lodge. The application site will provide users immediate access to the Fineshade Wood, The Arches, Fineshade Grounds Cafe, and many public rights of way/walking trails.
- 3.2 The applicant's ambition is to enhance the tourism offer at Fineshade Wood, for holiday makers who want to make the most of this remarkable and important tourism location. Therefore, the applicant proposes to offer an alternative to the Stamford Caravan and Motorhome Club site, which is immediately to the north, while recognising that the scale, level of operational development and density of their previous application was disproportionate and unacceptable. On this, the proposed development seeks to offer a very small scale, high quality, discrete and ecologically enhancing solution to the limited opportunity for campers to enjoy Fineshade Wood and its surroundings.
- 3.3 Users of the site will either reserve a pitch to erect a camping tent or reserve a glamping pod. The proposed 15no. glamping pods will be prefabricated, self-contained accommodation units, providing a sleeping area, kitchen cooking area, and a lounge for relaxation space. The glamping units are envisaged to be constructed of timber with a horizontal timber cladding for the walls and roof, which is a typical design for most glamping pods (although details can be reserved by planning condition).
- 3.4 Parking provision will be contained within the camping/glamping site on new hard standing, directed towards a single area at the of the site, which is hidden and shielded from view and will not become an eyesore. The proposed development ensures the laying of hardstanding is kept to as minimal an area as possible, in the interests of facilitating greenspace and aesthetic.
- 3.5 Users of the site will be encouraged to walk and cycle on the adjacent public rights of way, and utilise the public areas that can be accessed off the well-managed network of paths and trails. Notwithstanding this encouragement, it is expected that the proposed development will attract a clientele who will visit the location for the network of paths and trails. For this type of tranquil tourism development, these recreational routes are significantly more valuable to the guests of the site, and will outweigh the lack of convenient local public transport services. We elaborate on this matter in section 6 (main considerations) below.
- 3.6 It is recognised that the site is part of a landscape which has a valued openness and great degree of tranquillity, even considering its relationship with Top Lodge and the associated leisure activities and nearby Caravan Club Site. It is a fact that the proposed units will not be built structures as defined by the TCPA 1990 (as amended), and it is anticipated that at this minimal scale, and with the absence of paraphernalia that may be have been associated with the previously withdrawn caravan site, the proposal has a substantially less visible presence to the landscape and the significance of Top Lodge.
- 3.7 Throughout the application process for 18/02428/FUL, it became apparent that the ecological value of the site was valuable. As a result of these matters, this proposal includes an area designed for the sustainability and enhancement of these ecological assets. An ecological feature of mown grass, proposed vegetation and additional planting of a native hedgerow and shrub mix will provide an optimal habitat for the existing biodiversity. This feature area will be known as a 'Receptor Area', and will be managed by light grazing to maintain a suitable reptile

- habitat. This will take the form of a mosaic of tall undisturbed areas and tussock swards which would be left to provide reptiles with shelter, as well as areas of shorter open grassy areas to provide basking opportunities.
- 3.8 Along the perimeter of the accommodation areas, a species rich meadow grass is proposed, in addition to additional proposed vegetation planting. This will help reduce shading of suitable reptile habitat along the grassland verge to the north. The hedgerow along the northern boundary will be no larger than 2m in height and set back from the grassy verge at least 3 meters to avoid over-shadowing the grassy verge. The proposals for shrub planting and tree planting will add additional structural diversity and in time will provide areas for hibernation (hibernacula) around their roots.
- 3.9 During the determination period of 18/02428/FUL, many concerns were raised regarding the day to day management of the site. There were many concerns that, due to the proposal to manage the site remotely, noise, litter, and other undesirable actions could take place. In response to this, a single wardens lodge is proposed to ensure that the site is regularly policed, and site rules are strictly enforced. The warden will be in control of the day to day running of the site, which would include functional and aesthetic site maintenance. The warden would also address visitors on arrival and departure, being able to explain the specific site rules and deter any antisocial behaviour.

4 NEED FOR DEVELOPMENT

4.1 The application site benefits from a location which is convenient to popular tourist destinations within North West Leicestershire such as: the settlement Ashby de la Zouch; tourist attractions such as Donington le Heath Manor House; and, the expansive open countryside including the National Forest. Each of these features represent a significant tourism and leisure asset. Tourism is an important industry in the region and makes a significant contribution to the economy through the creation of jobs and the financial support it provides to local services and industry. This section takes a closer look at the specific trends affecting tourism in the area, and identifies the opportunity for the current proposal to address these matters in a manner that will ensure that the development contributes to the growth of sustainable tourism in the county.

National Tourism Contribution

- 4.2 Parliament's Briefing Paper on Tourism: statistics and policy (September 2019, **Appendix A**) and the ONS estimate for 2017 (as shown in the Tourism Alliance, UK Tourism Statistics 2019 – **Appendix B**) shows that the Gross Value Added (GVA) of Tourism for 2016 represented circa 4% of the total UK economic output (£68bn).
- 4.3 ONS Travel Trends 2019 (**Appendix C**) indicates there was a 1% increase when compared to 2018 on visitors to the UK from overseas residents (40.9 million visits). Visitor expenditure was a total of £28.4 billion, an increase of 7% compared with 2018 and overseas visitors spending more than in 2018 (increasing from £91 in 2018 to £98 in 2019); with an overall average spend per visit increasing from £658 in 2018 to £696 in 2019.
- 4.4 According to Visit England (**Appendix D**) in 2018, tourism in England contributed £106bn to the British economy (GDP) when direct and indirect impacts are taken into account, supporting 2.6 million jobs. When only direct impacts were considered (i.e. excluding aspects such as the supply chain), the contribution was £48bn, with 1.4 million jobs directly supported.
- 4.5 According to a report commissioned by VisitBritain in 2018 and by 'Pitching the Value 2019 Economic Benefit Report: Holiday Parks and Campsites England' (**Appendix E** – UKCCA, February 2019) the tourism sector in England had a direct GVA of £54.3bn and the holiday park/campsite sector represented a direct GVA of £2.64bn making a considerable contribution (8%) to the sector's GVA. The sector further supported 17,448 FTE jobs in the English economy. Visitors to English holiday parks and campsites stayed up to 74% longer and spent up to 60% more than the national tourism average.
- 4.6 When compared to 2017, 2018 saw a fall in inbound visitor numbers to the UK. This has been associated with the fall in European visitors. The interest of Europeans to visit the UK since the Brexit Referendum has fallen from 72% in August 2016 to 64% in March 2019 and although the number of visitors to the UK has been decreasing as a result of the decision of the UK to leave the EU, the UK Government sees the opportunity to attract tourists from non-EU countries and an increase of 'staycations' to increase their popularity and to increase the potential of domestic employment in the tourism sector (**Appendix A**). As such, in June 2019 the Government announced that a Tourism Sector deal will be produced in order to boost productivity in the sector, including strategies to increase visitors' numbers and experience.

- 4.7 Domestic tourism expenditure increased from £118bn in 2015 to £125.8bn in 2016, supported by an 11.3% (£7bn) rise in spending by same-day visitors (ONS, 2016).
- 4.8 In 2018, domestic tourism reduced 2% when compared to 2017 (118.6 million trips) and has been falling since 2011. However, domestic trips are 50% higher than foreign trips, which represents an opportunity to improve and invest in domestic tourism.
- 4.9 In 2019, Visit Britain forecasted that the tourism sector would see a 7.8% growth compared to 2018. The ONS also identified that the tourism industry has created more than 400,000 new jobs over the last 10 years (See **Appendix B**). However, as a result of the current pandemic, the tourism sector has been badly affected. Visit Britain 2020 Tourism Forecast (see <https://www.visitbritain.org/2020-tourism-forecast>) acknowledges there has been a decline of 59% in visits to 16.8m and 63% in spend to £10.6bn when compared with the initial forecasts for the year at from overseas visitors.
- 4.10 Regarding domestic visits, Visit Britain 2020 Tourism Forecast indicates there has been a decline of 49% for overnights and leisure day trips, although the pattern of the recovery will be different, with some categories of day trips recovering first.
- 4.11 Nonetheless, a report prepared by Schofields (see <https://www.schofields.ltd.uk/blog/5980/staycations-uk-travel-2020-21/>) has identified there has been an increasing trend for domestic travel, partly as a result of changes in consumer preference, such as the impact of flying on climate change (also acknowledged in the Parliament Briefing paper, **Appendix A**) which might account for an increase in domestic travel and expenditure for the rest of the year.
- 4.12 The report also identifies that consumers are worried about the financial futures of travel companies as well as their own finances, and therefore UK offers a more financially safe option for holidays.
- 4.13 Visit England All Trip Purposes 2019 (**Appendix F**) identifies that in 2019, 29% of domestic trips were accommodated in self-catering units such as camping and caravans. Taking into consideration social distancing measures to reduce potential exposure to COVID-19, it is anticipated local short-break in countryside locations will be preferred over longer holidays. This is supported by Visit Britain COVID 19 Consumer Weekly Tracker (**Appendix G**) which indicates consumer trends identify a preference for shorter breaks in the countryside or seaside village/town in self-catering accommodation (caravans), in order to reduce exposure to others.
- 4.14 The evidence found during this research shows that, although there was a small reduction in the contribution to the economy made by tourism in 2017, partly as a result of the decision of the UK to leave the EU, domestic tourism, although reduced from previous years and badly affected by the pandemic, accounts for circa 4% GVA of England. As a result of the pandemic, it is forecasted there will be an increase in short term countryside breaks, with particular increase on self-catering accommodation demand.

The Supply of Tourism Accommodation

- 4.15 Fineshade Wood is very well placed to provide holiday accommodation for campers to support tourism in the district. The site benefits from a relationship with provides a number of high quality public footpaths, which providing access to the woodland itself and to the countryside setting, in addition to the attractive settlement of King's Cliffe.

- 4.16 Holiday accommodation statistics are available on a regional basis from Visit England. The Visit England Occupancy Survey August 2020 results (Appendix H) illustrate that countryside occupancy decreased from 79% in 2018 and 2019, to 67% in 2020. In this regard, countryside occupancy was impacted less severely than occupancy rates in cities and large towns, small towns and seaside's. For example, occupancy in small towns has fallen from 80% in 2018 and 1029 to 54% in 2020. Occupancy in cities has fallen further, from 82% in 2019 to 43% in 2020.
- 4.17 The COVID pandemic has impacted the tourism industry significantly, however there is recognition that people who are enjoying tourism holidays are taking countryside breaks, which is helping to maintain a reasonably high countryside occupancy rate of 67%. The application site rests in the East Midlands where room occupancy across cities, towns countryside and seaside has fallen from 77% and 73% in 2018 and 2019 respectively, to 49% in 2020. Using 2018 and 2019 as a baseline for more 'normal' tourism habits, occupancy rates in the 70's% represents strong domestic tourism performance that can be built upon. Considering the fall in occupancy during 2020, but the strong retention of occupancy in countryside location, it can be considered that countryside tourism development is in an excellent position to grow.
- 4.18 We now turn our attention to the wider economic benefits of the development.

Benefits to the Local Economy

- 4.19 Tourism-based projects generate economic impacts in a number of ways. These include:-
- The impact of any construction activity, including direct employment arising on and off site, and indirectly in suppliers of materials and services.
 - The impact of the project during its operational phase. The operation will employ people directly on site, but it will also generate indirect employment in suppliers of goods and services used by the establishment during its operation.
 - External impacts arising from the activities of visitors to the project when they are away from the site itself. These activities will have direct impacts in other establishments benefiting from visitor expenditure, and also indirect impacts as those establishments in turn purchase goods and services from suppliers.
 - Additional income impacts also arise as employees whose jobs are directly or indirectly supported by visitor spending themselves spend money on leisure and other activities.
- 4.20 Research by the BH&HPA in 2019 (**Appendix E**) found that holiday and camping parks generate visitor spending of circa £101 per day with group size being on average 2.4. This would equate to a £42 per person per day, on average. Using this figure, it can be estimated that the proposed 15 new glamping pods (with the site occupied at say just 44% capacity, or 23 weeks a year – an industry recognised figure) - would generate £243,309 per year (£16,220 per unit) of additional spend in the community. This figure is obviously subject to significant improvement, where the park achieves greater than 44% occupancy, and this can be reasonably expected given the clear indication of high demand for holiday accommodation already discussed in this report.
- 4.21 A Deloitte research ('The economic contribution of the tourism economy in the UK', November 2013, **Appendix J**) indicates that:

"Tourism's impact is amplified through the economy, so its impact is much wider than just the direct spending levels. Deloitte estimates the tourism GVA multiplier to be 2.8 – meaning

that for every £1,000 generated in direct tourism GVA there is a further £1,800 that is supported elsewhere in the economy through the supply chain and consumer spending.”

- 4.22 Therefore, it is possible to conclude that in terms of GVA, the proposal could result in an increase of GVA of around £680,000.
- 4.23 The current proposals are based on the minimum units that will enable viability and ongoing investment into the quality and longevity of the camping/glamping site, whilst at the same time acknowledging and responding to the site’s constraints.
- 4.24 This information indicates that the proposed development will contribute significantly to the wider local economy, as a result of increased spend associated with holidaymakers visiting and using such services, facilities and attractions elsewhere.
- 4.25 Taking into account the substantial economic benefits that are in line with relevant national and local planning policies, we consider that the proposed development will be in the public interest, noting also Paragraph 80 of the NPPF which states that **“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”**.

5 PLANNING POLICY CONTEXT

Development Plan

- 5.1 Any proposed development must be judged against the relevant development plan and other government planning policy and guidance. Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require that planning applications should be determined in accordance with the statutory development plan unless material considerations indicate otherwise. For the purposes of this application, the relevant development plan comprises the Joint Core Strategy 2011 – 2031 (adopted 2016), and the saved policies of the Rural North, Oundle and Thrapston Plan 2011. The revised National Planning Policy Framework (2019, as amended) is relevant as a material consideration.

Joint Core Strategy 2011 – 2031 (Adopted 2016)

- 5.2 The North Northamptonshire Joint Core Strategy is the strategic Part 1 Local Plan for Corby, East Northamptonshire, Kettering, and Wellingborough. It sets the strategic policies and a vision to be developed in more detail through the Part 2 Local Plans prepared by District and Borough Councils. The Joint Core Strategy (JCS) Part 1 was adopted in 2016, and sets out the Council's main strategic planning approach and policies how development will be managed up to 2030. One of the Council's main objectives identified in the Plan is to provide "A strong focus on growing investment in tourism [and] leisure". Indeed, the support for the rural economy, and the key part that tourism can play in that, is a strong theme throughout the JCS.
- 5.3 Policy 1 of the JCS, titled 'Presumption in Favour of Sustainable Development', states that the Council will take a positive approach to development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). To be regarded as sustainable within the context of North Northamptonshire, development should contribute to delivering the Plan Vision and Outcomes through compliance with the relevant policies of the plan.
- 5.4 Policy 2 on 'Historic Environment' sets out the distinctive historic environment will be protected, preserved and enhanced where appropriate. Where development would impact upon a heritage asset and/or its setting, proposals should complement their historic environment through form, scale, design and materials. Proposals should protect and enhance key views and vistas of heritage assets and demonstrate an appreciation and understanding of the impact of development on these assets.
- 5.5 Policy 4 on 'Biodiversity and Geodiversity' sets out a net gain in biodiversity and geodiversity will be sought. Biodiversity and geodiversity assets will be protected by refusing development proposals where significant harm to an asset cannot be avoided, mitigated or compensated. Key assets for wildlife and geology will be protected from unacceptable levels of access, and pressures for access will be managed to address the disturbance of sensitive habitats. The natural environment will be protected against adverse effects from noise, air and light pollution. Ecological networks will be enhanced by managing development and investment to reverse habitat fragmentation and increase connectivity of habitats where possible. Development will preserve, restore and create priority and other natural and semi-natural habitats within and adjacent to development schemes.

- 5.6 Policy 8 on 'North Northamptonshire Place Shaping Principles' sets out a number of criteria to assist in creating connected places which are safe, pleasant, adaptable, diverse, flexible, distinctive and ensure the quality of life and healthier communities.
- 5.7 Policy 10 on 'Provision of Infrastructure' sets development must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from the development and to support the development of North Northamptonshire. To achieve this, developers will make provision of infrastructure required by the development. In addition, development should seek to minimise increases in the demand for infrastructure and services, including through measures to encourage a reduction in car use, and to create safe, healthy environments. Planning permission will only be granted if it can be demonstrated there is, or will be sufficient infrastructure capacity provided with an agreed timescale to support and meet all the requirements arising from the proposed development.
- 5.8 Policy 11 on 'The Network of Urban and Rural Areas' sets out development criteria for the rural areas. Section 2 explains development in the rural areas will be limited to that required to support a prosperous rural economy, or to meet a locally arising need which cannot be met more sustainably at a nearby larger settlement. Rural diversification will be supported in accordance with Policy 25. Other forms of development will be resisted in the open countryside unless there are special circumstances as set out in policy 13, or national policy.
- 5.9 Policy 22 on 'Delivering Economic Prosperity' explains a stronger, more sustainable economy will deliver a net increase of 31,100 jobs. Such jobs will be sought through a number of means, including the safeguarding and enhancement of North Northamptonshire's tourism and cultural assets. Proposals will be supported where they expand the tourism industry in sustainable ways.
- 5.10 Policy 25 on 'Rural Economic Development and Diversification' sets out that sustainable opportunities to develop and diversify the rural economy will be supported where they are of an appropriate scale for their location and respect the environmental quality and character of the rural area.
- 5.11 Encouragement will be given towards the provision and expansion of tourist and visitor facilities, recognising that locations with access to local services and facilities by foot, cycle or public transport provide the greatest opportunity for sustainable rural development. Additionally, commercial opportunities related to ecotourism will be encouraged, as will development which enhances local supply networks by linking businesses and consumers that support the shift to a low carbon economy and support local producers and businesses.

Rural North, Oundle and Thrapston Plan

- 5.12 The Rural North, Oundle and Thrapston Development Plan Document was adopted in July 2011. The Plan is a site-specific proposals document based on the framework set by the North Northamptonshire Core Spatial Strategy. The Plan sets out the vision and detailed policies for the development, regeneration and planned growth, and the sustainable development of communities in the rural north of East Northamptonshire.
- 5.13 The Rural North, Oundle and Thrapston Plan will be replaced by the District-wide Local Plan Part 2. Preparation of the Plan started in January 2017 and the Local Development Scheme confirms adoption of the Plan is anticipated for 2021. Until the replacement Plan is adopted, the existing

- Plan policies carry full weight. There are a number of specific policies in the Rural North, Oundle and Thrapston Plan that are relevant to this proposal, and these shall now be looked at in turn.
- 5.14 Policy 4 on 'Green Infrastructure' sets out development within the Plan area will contribute and link into the wider green infrastructure network. Routes utilising and enhancing the existing rights of way network will be established in order to promote and diversify green infrastructure in the Plan area. Employment development should improve connectivity through the provision of foot and cycle routes, create space for nature conservation, green education, green economic uses and imaginative recreational facilities.
- 5.15 Policy 5 on – 'Transport Network' explains improvements to the bus and community transport network should be concentrated upon providing "feeder services" from rural areas to service centres in Plan area. New development of over 0.5 hectares of commercial uses will be required to include attractive and direct walking and cycling routes, connecting into the existing planned network.
- 5.16 Policy 9 on 'Buildings of Local Architectural or Historic Interest' asserts that proposals which affect a building of local architectural or historic interest, or its setting, will only be acceptable where the character, appearance and historic interest and integrity of the building is safeguarded, and the setting of the building is preserved or enhanced.
- 5.17 Policy 11 on 'Enhancing Biodiversity' states new development that is linked or has an effect upon priority habitats will be required to contribute towards habitat creation and restoration. Wherever possible, stepping stones and corridor links for the migration and dispersal of wildlife should be provided.
- 5.18 Policy 19 on 'The Delivery of Green infrastructure' of the Joint Core Strategy addresses the special mixed urban and rural character of North Northamptonshire will be maintained and enhanced. This will be realised though, among other strategies, the management development and investment to secure a net gain in green infrastructure, and contribution towards the enhancement or ongoing management of local green infrastructure corridors. Page 106 of the plan illustrates the proposed development site close to connection point 19a, which is the Wakerley Wood - Fineshade Wood, and this connects directly to point 19b representing Kings Cliffe.

Draft East Northamptonshire Local Plan Part 2

- 5.19 The Draft East Northamptonshire Local Plan Part 2 went through a public consultation process during November 2018 – February 2019. A number of significant issues were raised that the Council needs to address before the plan will be submitted for examination. On this, adoption of the plan is anticipated in February 2021. While the policies in their current form are not adopted, they show the vision and context of the Council's planning ambition, and as the plan progresses, will increasingly carry weight in the decision-making process.
- 5.20 Policy EN13 on 'Designated Heritage Assets' sets out great weight will be given to an assets conservation. Development proposals will be supported where they sustain and enhance the character, appearance and significance of designated heritage assets. Proposals will be refused where harm to the significance of an asset occurs, unless a justification of public benefit exists, outweighing the importance of the asset, and the scale of harm.

- 5.21 Policy EN15 on 'Tourist and Cultural Development' sets out that in the Rockingham Forest area, new tourist assets will be supported where there are no unacceptable highways or sensitive receptor (e.g. SSSI and SPA) issues. Developments will be expected to deliver enhanced connectivity to the Greenway, and not adversely impact the surrounding countryside.
- 5.22 Policy EN16 on 'Tourist accommodation' explains that in order to manage tourism developments, it will be necessary to use suitable legal agreements to ensure that these are retained for tourist accommodation.

Other Material Considerations

National Planning Policy Framework

- 5.23 The revised NPPF was published in February 2019 and sets out the Government's planning policies for England. A presumption in favour of sustainable development is at the heart of the NPPF, which should be seen as a 'golden thread' running through both plan-making and decision-making. For decision-making this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or specific policies in the NPPF indicate that development should be restricted (Paragraph 11).
- 5.24 Paragraph 8 of the NPPF states that there are three dimensions to sustainable development: economic, social and environmental. This includes an economic objective to help build a strong, responsive and competitive economy; a social objective to support strong, vibrant and healthy communities and an environmental objective to contribute to protecting and enhancing our natural, built and historic environment. As referenced above, it is considered that the proposed development will be economically, socially and environmentally sustainable, taking account of the economic benefits, opportunities created for tourism and leisure, and by causing minimum harm to the countryside.
- 5.25 The NPPF contains policy guidance for achieving sustainable development for a number of themes and topics, including: building a strong, competitive economy; supporting a prosperous rural economy; conserving and enhancing the natural environment.
- 5.26 In terms of a strong, competitive economy, the NPPF states that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future. Planning should operate to encourage and not act as an impediment to sustainable growth, with Paragraph 80 stating "*significant weight should be placed on the need to support economic growth and productivity.*"
- 5.27 In terms of supporting a prosperous rural economy, Paragraph 83 states that planning policies and decisions should enable:
- (a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; and

- (c) sustainable rural tourism and leisure developments which respect the character of the countryside
- 5.28 Paragraph 84 sets out planning decisions should recognise that sites to meet local business needs in rural areas may have to be found beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads, and exploits any opportunities to make a location more sustainable. Such means may include improving the scope for access on foot or by cycling.
- 5.29 The NPPF also states that the planning system should pay regard to the natural and local environment. Paragraph 170 states the planning system should contribute to and enhance both such environments, for example by protecting and enhancing valued landscapes, by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution.

6 MAIN CONSIDERATIONS

6.1 The main considerations in this case are:

- Whether the proposed development is acceptable in principle, taking account of its countryside location;
- The sustainability of the development;
- The effects of the development on highway safety and accessibility;
- The effects of the development on the character and appearance of the local landscape;
- Residential Amenity
- The effects on the ecology and biodiversity of the surrounding area; and
- The risk of surface water flooding arising from the development.

6.2 Each of these considerations are addressed below.

Principle of Development

6.3 The proposal seeks to invest in, improve on and raise the standard and quality of the tourism offer at the site's location. The development will result in a new site for a new type of tourism use, which would provide a significant contributor to the local economy. An existing tourism facility can be found approximately 50m north of the site at the Stamford Caravan and Motorhome Club Site.

6.4 As noted above, Policies 11, 21, 22 and 23 seek to deliver rural economic prosperity through expansion to industries including tourism if they accord with Policy 25. Policy 25 sets out that opportunities to develop and diversify the rural economy will be supported, where it is of an appropriate scale and respects the rural character.

6.5 In conjunction, the NPPF supports sustainable rural tourism and expansion to tourist and visitor facilities in rural areas as a means of promoting a strong rural economy, and states that significant weight should be placed on the need to support economic growth through the planning system. Policy 10 sets out development should seek to minimise increases in the demand for infrastructure and services, including through measures to encourage a reduction in car use.

6.6 The development proposal is felt to fully accord with the development plan and NPPF by providing a tourism asset of limited scale in an area which benefits from high quality greenspace and is close to an existing touring caravan site. The modest proposal strikes a balance between visitor numbers and biodiversity, landscape, and amenity, while taking care to avoid heritage impacts. While users would likely travel to the site by car, it is expected that users would utilise the sites remote location and woodland position to explore the countryside on foot or by bicycle.

Sustainability

6.7 In terms of the strands of sustainable development identified under Paragraph 8 of the NPPF firstly, economically, the proposed development will secure economic benefits for jobs and the local economy. These include:

- The impact of any construction activity, including direct employment arising on and off site, and indirectly in suppliers of materials and services.
- The impact of the project during its operational phase. The operation will employ people directly on site, but it will also generate indirect employment in suppliers of goods and services used by the establishment during its operation.
- External impacts arising from the activities of visitors to the project when they are away from the site itself. These activities will have direct impacts in other establishments benefiting from visitor expenditure, and also indirect impacts as those establishments in turn purchase goods and services from suppliers.
- Additional income impacts also arise as employees whose jobs are directly or indirectly supported by visitor spending themselves spend money on leisure and other activities.

6.8 In addition to the above, the BH&HPA in 2019 (**Appendix E**) sets out the total turnover and visitor expenditure as a result of the UK holiday park and campsite sector is approximately £9.3 billion per annum. Its total economic impact to the UK has been calculated as a Gross Value Added (GVA) contribution of £5.3 billion per annum, supporting a total of 171,448 direct and indirect jobs in the UK.

6.9 Environmentally, the development will bring about changes to the site in a way that protects species and enhances local habitats. The use of hedges and landscaping will provide for an increase in biodiversity. Each of the glamping units will incorporate energy saving measures where possible. As largely pre-fabricated units, they will be delivered to the site ready for siting, which will help to reduce vehicle movements as part of the construction process, leading to less environmental pollution due to reduced vehicle mileage.

6.10 In terms of the social role, this extends to supporting strong, vibrant and healthy communities. In this respect, the proposed development will enhance access to paths and promote wider community health and fitness through active travel. Additionally, the development will provide opportunities for people to enjoy the countryside.

6.11 For all these reasons, the proposal contributes to the dimensions of sustainable development as set out in the NPPF.

Highway Safety and Accessibility

6.12 The application is accompanied by a Transport Statement which explored the accessibility and local transport options for the site, and found the site has access to a number of different local sustainable travel options. Personal Injury Accident data shows there are no road safety issues within the vicinity of the site, and the proposals will not create any. Trip generation of the proposed development has been calculated and is found to be low.

6.13 The site and proposals have been thoroughly assessed on Transport grounds and it is considered that there are no transport or highways issues which should result in planning permission not being granted.

Impact on Local Landscape

- 6.14 The application is accompanied by a Landscape and Visual Assessment (LVA) which examines the likely landscape and visual effects of the project. The report sets out the caravan park scheme would not result in significant harm to the value of the landscape as there would be no loss of important landscape features or elements, and only minimal loss of the sites open characteristics. The well contained nature of the proposal within a landscape structure provided by trees, extensive tracts of mature woodland, and supplemented by new landscape planting, would limit the effects on the wider King's Cliffe Hills and Valleys character area.
- 6.15 The assessment concludes that there would be very limited visibility of the proposed development from the publicly accessible locations within the nearby arable farmland, plantation woodland and leisure facilities at Fineshade Wood. No receptors identified within the study area would experience significant adverse effects as a result of the proposed development.
- 6.16 Walkers using the footpath which lies adjacent to the north and eastern boundaries of the application site would experience moderate adverse effects, reducing to negligible or minor adverse when mitigation planting has matured. Visitors to the leisure and tourism facilities at Top Lodge would initially experience no change in view, improving to minor beneficial effects as the landscape proposals mature and the condition and character of the site would be enhanced. Local residents would experience no more than negligible effects on views as a result of the proposals.

Residential Amenity

- 6.17 There are no residential properties close to the site. There is no impact therefore on residential amenity in respect of loss of privacy, overshadowing, noise or disturbance. Further, the proposed planting will soften the impact of the development for residents who have views of the site. It is therefore considered that the levels of amenity currently enjoyed by existing residents in the area will not be unduly harmed by this proposal.
- 6.18 The Noise Impact Assessment (NIA) establishes a baseline noise survey, and these noise levels have been used to undertake an assessment of potential noise impacts on nearby residents from the various noise sources that may be associated with the proposed development. To ensure that noise continues to be considered by the premises, a noise management plan has been proposed to minimise the impact of operation on the surrounding residents and a procedure has been put forward for efficiently dealing with any complaints should they arise.
- 6.19 The NIA considers that with good management of the site, noise from the proposed use would not be expected to negatively impact on nearby residents. It is also recognised that due to local topography, noise levels would be lower than predicted – which are already at a level considered unlikely to impact the neighbours – further reducing the chance of disturbance or impact to amenity.

Ecology

- 6.20 As noted above, the application is supported by a PEA and Ecological Assessment. The assessments found that the application site comprised an area most characteristic of poor semi improved grassland, but with the potential to support a more diverse flora.
- 6.21 A desk study identified five statutory designated sites within 5km of the site, and the majority of these were far enough away that the development of the site would have no effect upon them. They are sufficiently screened and buffered from the site by the surrounding landscape that it is unlikely that any air- or water- borne pollutant would reach them during development of the site.
- 6.22 The site provides habitat for reptiles, although the areas used for grazing are less populated. A peak count of 16 slow worms was recorded during a single survey visit during the 2019 survey. This was considered to be a 'good' size population of slow worms. Five common lizards, two adders and one grass snake were also recorded during a single survey visit. These were considered to be a 'low' population size.
- 6.23 During the 2020 survey, a peak count of eight reptiles were found in a single survey visit. The site is considered to support a 'good' population of common lizard with a peak count of seven found, a 'low' population of slow worm with a peak count of four found. No grass snake or adder were found during the 2020 surveys.
- 6.24 The loss of suitable habitats during the construction phase would put reptiles at risk of injury or death, therefore habitat manipulation will be used to reduce the viability of the grassland around the working area of the proposal prior to works commencing. A controlled approach will then be undertaken to site clearance in the areas where potential habitat is to be lost within the working area such as any areas of rough grassland, scrub and earth banks in order to displace any reptiles present into retained areas of contiguous habitat within the site and wider area.
- 6.25 The assessments set out the landscaping and ecological enhancements that the development will deliver to protect and enhance the local wildlife.

Flood Risk

- 6.26 The application is accompanied by a Flood Risk Assessment. The Environment Agency Flood Map for Planning indicates that the site is located within Flood Zone 1 therefore the proposed development is considered to have a low risk of fluvial and tidal flooding. In addition, the site is also considered to have a low risk of flooding from all other sources.

Heritage

- 6.27 A Grade II listed building can be found immediately to the north of the site. Paragraph 189 directs local planning authorities to 'require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' significance and no more than is sufficient to understand the potential impact of the proposal on their significance'.
- 6.28 The accompanying Heritage Statement identified the legislation, planning policy, and guidance that is relevant to heritage issues regarding the proposal site. The report conducts a thorough assessment and finds that no designated heritage assets would be physically impacted by any

part of the proposed development, and any potential effects would be in the form of loss of significance as a result of change within the setting of the asset.

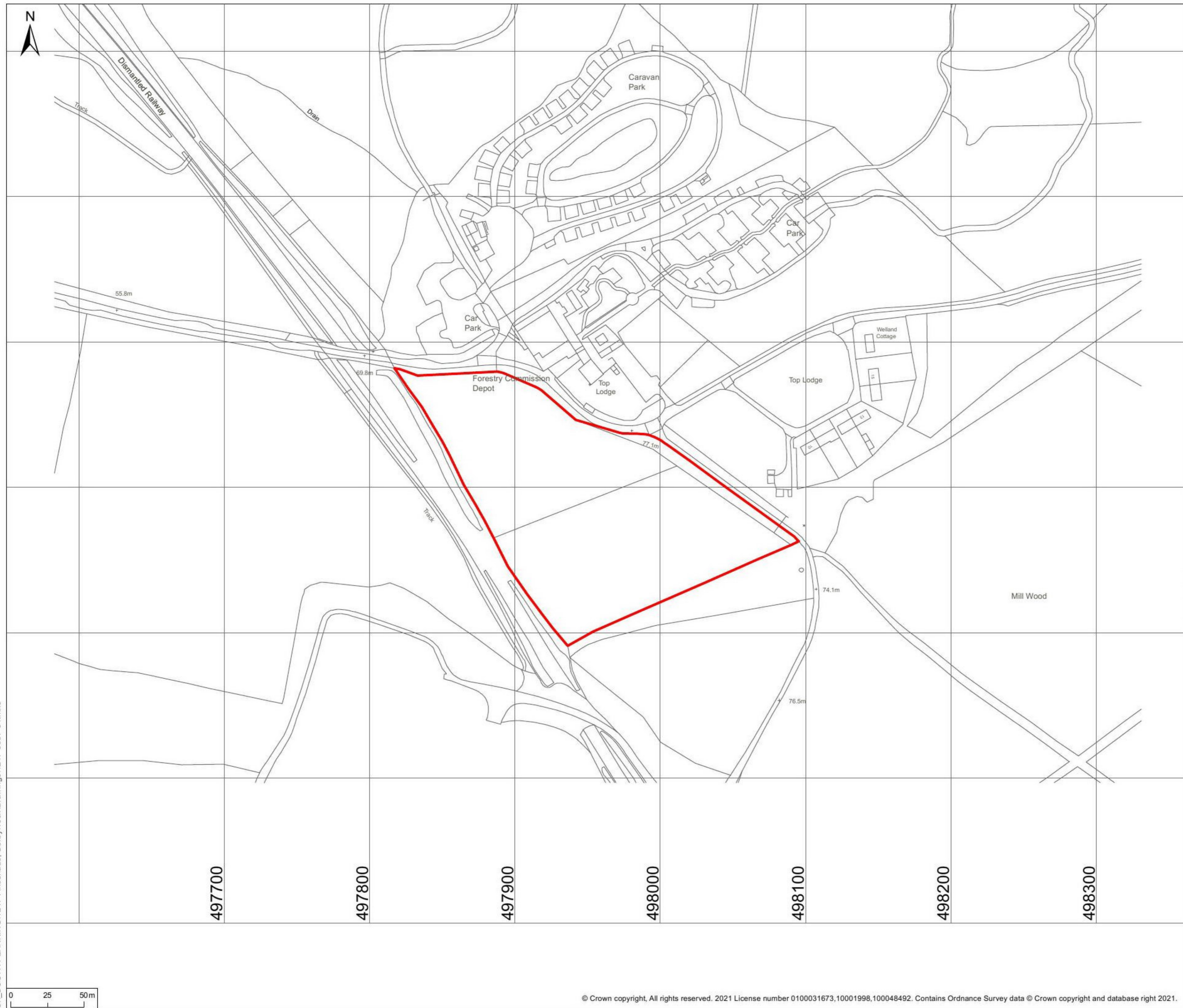
- 6.29 The assessment found the proposed development would not result in any harm to the significance of the Grade II listed Top Lodge.

7 SUMMARY AND CONCLUSIONS


- 7.1 RPS Planning and Development has been instructed to act on behalf of the Applicant, and owner of the site. Planning permission is sought for the change of use of land to a camping/glamping site and ancillary wardens accommodation within on an area of 2.48 hectares. The preceding sections of this Statement establish the planning policy and history relevant to the proposed development.
- 7.2 The principle of the type of development proposed, seeking to invest in the rural economy and to provide quality holiday accommodation for the tourism sector upon which East Northamptonshire relies, is supported by the development plan and the NPPF. The benefits to the local economy through tourism are significant and long term. The proposal, through its economic as well as environmental and social benefits, contributes to and accords with the Government's key objective of delivering sustainable development. The proposal is policy compliant and is in accordance with the development plan.
- 7.3 The supporting documentation provided with the application demonstrate that no other material considerations exist that cause such harm to outweigh the benefits of the proposal. Appropriate mitigation is proposed wherever necessary.
- 7.4 For all these reasons, the proposal is considered to have significant merit and should receive the support of the local planning authority.

Figures

Figure 1 – Site Location Plan



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Legend
 Application boundary

Rev	Description	By	CB	Date

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Client **Countrywide Park Homes**
 Project **Land south of Top Lodge, Fineshade, Corby, NN17 3BB**
 Title **Site Location Plan**

Status **DRAFT** Drawn By **CR** PM/Checked By **DH**
 Project Number **PPS1217** Scale @ A3 **1:2,500** Date Created **MAR 2021**

Figure Number **1217-0007-01** Rev **-**

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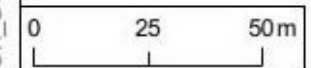


Figure 2 – Site Layout Plan



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- Application Boundary
- Warden Units
- Glamping Pod
- Existing Post and Rail Fence
- Existing Vegetation
- Proposed Native Woodland Edge Mix
- Proposed Species Rich Meadow Grass to make good disturbed areas
- Existing grassland retained and managed for species diversity
- Proposed Trees
- Native Hedgerow Mix with Post and Wire Mesh Fence
- Native Shrub Mix
- Camping Site (mown)
- Proposed Parking

Rev	Description	By	CB	Date



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Client Countrywide Park Homes

Project Land south of Top Lodge, Fineshade, Corby, NN17 3BB

Title Proposed Site Layout Plan

Status DRAFT	Drawn By CR	PM/Checked by DH
Job Ref PPS1217	Scale @ A3 1:1000	Date Created SEPT 2020

RPS Drawing/Figure Number 1217-0006-08	Rev -
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Appendices

Appendix A – Parliament Tourism Briefing Paper Sep 2019