

# **DUDDINGTON-WITH-FINESHADE** **PARISH COUNCIL**

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20<sup>th</sup> May 2021

Dear Sirs,

**NE/21/00388/FUL: CHANGE OF USE OF LAND TO A  
CAMPING/GLAMPING SITE AND AMENITY WARDEN'S  
ACCOMMODATION. LAND SOUTH OF TOP LODGE, TOP LODGE ROAD,  
FINESHADE, NORTHAMPTONSHIRE**

The Parish Council has considered the above application and has many strong objections to the proposals and which are set out as follows in this document.

- 1) Emerging Neighbourhood Plan and Local Green Space designation
- 2) Ecological issues - Local Wildlife Site
- 3) Principle of Development in Open countryside
- 4) Loss of Residential Amenity
- 5) Road and access issues
- 6) Setting of the Grade-II listed building
- 7) Wider Landscape issues

## **1) Emerging Neighbourhood Plan and Local Green Space designation**

This Parish Council began working on the Neighbourhood Plan (NP) for Duddington with Fineshade in 2016 and it will be shortly sent for Regulation 14 consultation. The Plan will designate the meadow as Local Green Space (LGS) so, although it has not yet achieved statutory protection, we strongly request that the value of this space to the community be taken into account.

**POLICY ENV 1: PROTECTION OF LOCAL GREEN SPACE** – Development proposals that would result in the loss of, or have an adverse effect on, the following Local Green Spaces (map, figures 7.1 and 7.2; details, Appendix 8) will not be permitted other than in exceptional circumstances.

‘Mr McGregor’s Garden’, Duddington (Inventory reference 040); area 0.13 ha

Welland access green, Duddington (042); area 0.06 ha

Fineshade meadow ‘Sheep field’ (608); area 2.24 ha

Community green and orchard, Fineshade; (606); area 0.96 ha

The NP’s Equalities Impact Assessment has been approved by the Principal Planning Policy Officer, the Habit Impact Assessment has been approved with amendments, and the Sustainable Environmental Assessment has been completed.

The vision for the NP has been agreed and approved by the Parish Council.

“Our vision is to ensure that by 2031 Duddington with Fineshade will be thriving vibrant rural communities both with a strong sense of place and individuality. The neighbourhood will have evolved to meet the social needs of the 21<sup>st</sup> century whilst retaining a strong sense of history grounded in the tranquillity of the rural surrounding in particular the large woodland area and river landscapes.”

Objectives include:

- To develop access to open spaces while ensuring that our special wild places and wildlife continue to be protected
- To ensure that woodland areas remain accessible to all to enjoy.
- To seek methods of protecting the neighbourhood’s unique habitat ensuring that woodland areas (the resident species are allowed to flourish).

As part of the consultation process several community events took place and surveys were carried out. As part of the statutory requirements a series of consultation processes were undertaken including community events, together with a parish-wide survey to allow people to share their views of the Parish both now and for the future. Analysis showed that residents expressed a clear desire to maintain what is special about the Parish for future generations and it became quite clear that its countryside settings and the quiet pace of rural life were seen as being of particular importance. Again and again the value to the community of Fineshade Wood in general, and the visitor facilities at Top Lodge in particular, were stressed.

Out of this analysis a number of policies were developed which are referred to within this objection. However, the most relevant of these is the identification of the meadow as Local Green Space. This was initially identified using results from the community questionnaire which asked residents of the Parish which areas they considered to be of high value to the community. Following this, 129 parcels of open or undeveloped land within the Parish were inventoried and 50 were identified as natural, historic and/cultural and community, using the seven criteria for Local Green Space designation. The inventory used criteria and scoring system developed from the National Planning Policy Framework 2018. Four sites within the Parish scored highly with the open meadow (known locally as the Sheep Field) at Top Lodge being one

such site. This demonstrated how valuable this meadow was felt to be for residents of the whole neighbourhood. The assessment showed that:

- the site sits within the western edge of Fineshade Wood and there is open countryside aspects to all boundaries;
- it is a wholly green-field site;
- the site is bounded by a wood to the southern boundary. It is very rural in character and development would cause a substantial harm to quality and amenity;
- an essential component of the setting is the Grade II listed building;.
- it provides informal access for wildlife viewing, sledging etc

For many years prior to being bought by the present owner, this meadow was used by residents to graze sheep and cattle. Attempts have been made to allow local graziers to continue to use the meadow but to no avail and it has been left unmanaged, the first time in living memory. However as the meadow is unlocked, people are still able to gain informal access to appreciate the wildlife and biodiversity that the field has to offer.

Following the guidelines for Neighbourhood Plans, the Council attempted to engage in consultation with the landowner, Mrs Barney. A letter was sent in 2019 informing her of the development of the Plan and of our intention to carry out a Sustainable Site Assessment (SSA) of the meadow. She was invited to respond but, to date, has not done so.

A Local Green Space is described as being:

“Demonstrably special to the local community and holds a particular local significance for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife.”

so a SSA was carried out by the NP Advisory Group working with consultants, to ensure that the meadow met these criteria. Mrs Barney was informed by letter of the outcome of the SSA but once again there has been no response to our attempts to engage in consultation.

As a result the meadow is now included in the NP and we expect that it will become a designated Local Green Space. The Parish Council are able to provide supporting documents for all the above processes if they are required.

***A great deal of time, energy and effort has been expended in preparing this Neighbourhood Plan and engaging with the planning process. All that would be wasted if the proposed development goes ahead against the clear wishes of the local communities.***

## **2) Ecological issues - Local Wildlife Site designation**

The Parish Council object to this proposal for the following reasons:

- no appreciation of the designation of the meadow as a Local Wildlife Site;
- inadequate and/or outdated surveys for key species groups;
- inappropriate action proposed for protected species.
- The application makes no mention of the fact that the meadow has recently been designated as a Local Wildlife Site. This designation is carried out by the

Northamptonshire Local Wildlife Site Panel which includes representatives from the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire and also from the local councils. The given reason for designation was:

Fineshade Field is within a key area of the county for adder with evidence of breeding found during the surveys in 2019. It therefore, meets the criteria to be a LWS.

The Parish Council understands that the owner of the meadows was consulted without success and subsequently informed of the Panel's decision in April last year, along with other stakeholders including this Parish Council. The applicant's agents do not seem to have been made aware of the meadow's new status but, had they requested recent biological records from the county records centre, they would certainly have been made aware .

As the county's Ecological Adviser says in her objection (dated 29 April), "the proposed development is not consistent with the LWS designation. The presence of light, noise, vehicles, odours and other factors associated with human activity would in my view pose too great a disturbance, in particular to the adders and slow-worms."

Several conservation bodies and individual ecologists have pointed out that there have been inadequate and outdated surveys for key species groups (badgers, bats, invertebrates, plants). (See, for example, Objection by Barrie Galpin, Objection dated 5 May)

Mitigation measures, particularly for reptiles are inappropriate and inadequate. We base this argument on the excellent detailed objections submitted by the Wildlife Trust BCN (Comments dated 13 May), by one of the country's leading herpetologists (Tom Langton, Objection 26<sup>th</sup> April), and by Amphibian and Reptile Groups UK (Objection 5 May)

***The applicants have shown no recognition that a site where venomous snakes breed is no place for a campsite. It would endanger both the snakes and the campers.***

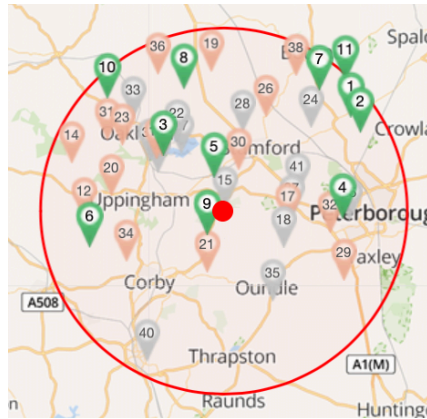
### **3) Principle of Development in Open Countryside**

The Parish Council objects to the application because it fails to make the case that there is a need for this development in an area of Open Countryside.

In summary our arguments are as follows:

- there is already a wealth of tourist accommodation in the area so no need for more;
- the applicants' estimated economic benefits to the area are fanciful;
- this is not sustainable development.

In this respect we refer you to the detailed comments and analysis provided in the Public Comments submitted by Mr Paul Diver (13 May). In particular he has calculated that there are 42 existing camping/caravanning sites within a distance of 15 miles and these provide c.1000 units of accommodation.



*The 42 existing sites within 15 miles of Fineshade*

The applicants use the same discredited and outdated sources of information as previously in their claims about the value of the development to the local economy, even suggesting that the site lies in NW Leicestershire. They have at least scaled down the claimed income to take account of the smaller number of sites proposed this time, but the validity of their figures cannot be relied upon.

From a financial point of view it is obvious that the investment needed by the applicant to carry out major earth moving operations (currently unspecified) in order to construct a level roadway and carpark, to install the (currently unspecified) necessary infrastructure and to build the glamping pods and warden's accommodation, would not produce a positive return if there are to be as few as 15 pods. The applicant would have to increase the size of the project or accept losing money. A project that does not cover its own costs is unlikely to honour its mitigation or S278 agreements.

Again the applicants have reused previous arguments to claim that the project is technically sustainable. The Parish Council disagrees profoundly and refer you to the comments and analysis provided by Mr Paul Hackett (Objection dated 28<sup>th</sup> April, pages 8-10).

***This Parish Council urges you to accept that there is no case made for this development in open countryside to go ahead. There is no need for it, the economic arguments are unconvincing, and there is no case made that this is sustainable development.***

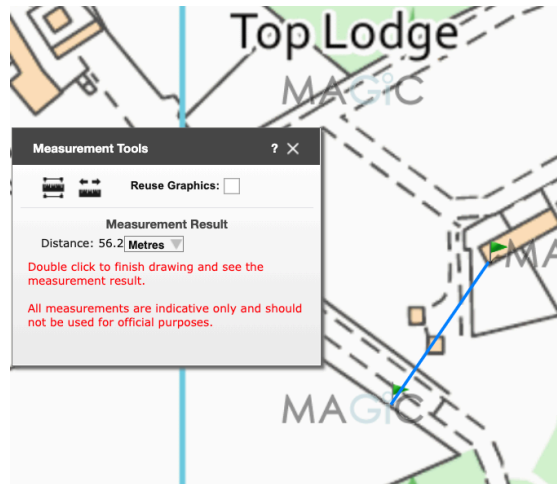
#### **4) Loss of Residential Amenity**

The Parish Council objects to the application because of the adverse impact it will have on the seven residential properties that are situated very close to the proposed camping ground.

The most serious threat to residents' amenity and health comes from the complete lack of toilets at the proposed camping site. The nearest public toilets are many miles away and those in Forestry England's Visitor Centre are only open from 9:00 to 5:00. It may be feasible to include a small toilet in each camping pod but the occupants of the undefined number of tents are presumably expected to relieve themselves in the

adjacent woodland, or perhaps to dig their own latrines on site? This Parish Council believes that this omission from the Planning Application alone should be sufficient reason for it to be rejected.

The application is miss-leading and self-contradictory in describing the proximity of residential properties, even stating in the Planning Supporting Statement (sec. 6.17) that “There are no residential properties close to the site”! However, this image shows clearly that the nearest house, no 10, Top Lodge, lies less than 60m from the proposed site boundary. That property’s garden is even closer (approximately 35m).)



(Image created using <https://magic.defra.gov.uk/magicmap.aspx>)

The Parish Council believes there will be loss of amenity not just to the residents but also to visitors to Top Lodge and those that work there because of:

- noise,
- light,
- smells.

The Noise Impact Assessment, referring to distances of 200m and 120m from the “8 terraced houses”, accepts that the householders will experience the sounds of BBQs, music, dogs, vehicles, etc. emanating from the camp site. However, in a work of imaginative fiction, a Noise Management Plan is expected to control this, implemented by the onsite warden with community liaison meetings, complaints procedures etc.

After dusk at the moment residents’ gardens and the surrounding forest are tranquil, dark and free of human noise. Approximately 100 campers joyfully singing around their barbeques, playing their music and calling to each other a short distance away will certainly interfere with the normal natural sounds of wildlife and the wind in the trees. Reports from similar sites owned by the applicant indicate partying till well past midnight.

Light pollution will also be a problem as detailed in the objection lodged by the Campaign for Dark Skies. No lighting strategy is given in the application though the objection made by the Community Safety Officer calls for low-level bollard lighting. In total we estimate that the development will cause the addition of around 100 lights on buildings and tracks around the site for safety reasons. These are lights that do not

exist at present and no matter how sensitively located will cause disturbance and light pollution to the existing natural state. In addition the noise and light caused by returning vehicles after dusk will certainly cause nuisance to residents. Car headlamps will be shining into the windows and noises of car doors will be intrusive late at night.

There are smells associated with campsites that will also have an adverse effect on residential amenity. Most obvious are smells from barbecues, but far less savoury will be smells from waste. The proposal fails to mention how litter and rubbish will be managed. People who arrive by car, bus or taxi are unlikely to take their rubbish home with them. This will require storage facilities and the waste will need to be disposed of frequently, further increasing the number of heavy vehicles accessing the site. The waste will inevitably smell and require a large area to house it, typically in brightly coloured skips.



*Waste disposal eyesore on a glamping site previously owned by the applicant near Thetford*

But of far greater concern are the likely smells of human bodily waste. Not only is there no toilet block but also no specified sewage treatment plant or proposal for its management. As detailed in other expert objections, even a suitably sized treatment plant will very likely emit an odour of maturing sewage unless managed rigorously.

***This Parish Council believes that there will be a considerable loss of residential amenity due to intrusive noise, light, smells and above all, unspecified methods of dealing with bodily waste.***

## **5) Road and access issues**

This Parish Council objects to the application because of the unsuitable access to the site from the A43 trunk road, already exacerbated by recent increases in road usage.

Just as with our previous objections to previous similar applications to develop this site we have three particular concerns:

- the dangerous junction of the A43 with the single track lane;
- the width and condition of the single track lane and its passing places;
- the proposed new 5-way junction in front of Top Lodge.



The Parish Council's view is that all three of these areas are already congested and overused. Any further increase in traffic caused by the proposed Change of Use to a camping site is unacceptable.

Forestry England operate vehicle counters at the entrances to their car parks and in 2019 these allowed them to estimate a total of 160,000 visitors that year. In 2020 their estimate was again 160,000 (source Forestry England April 2021) but for some months of the year the carparks were closed and the whole country was in the lockdown caused by the pandemic. Therefore these yearly figures are a sure indication of a considerable increase in visitor numbers *at peak times during 2020*. This confirms the widely reported increased pressure on rural roads during 2020-21, an increase witnessed particularly by visitors to and residents of Top Lodge, many of whom have provided pictures and first-hand accounts of congestion in their numerous objections to this application.

- The A43 junction is a crossroads with no turning or deceleration lanes which has been a highly criticised section of road and has seen many accidents caused by vehicles turning into or out of Fineshade. Not only is there an increase in turning traffic, but also a marked increase, particularly of heavy goods vehicles using the A43. The cross-country route from the northern part of A1 to the A14/M1 has been made much more popular by road improvements to the A43 further south. In addition local developments have contributed to this increase, in particular the development of the quarries at Wakerley and Collyweston, the new housing developments at Priors Park, both sides of Weldon and the new industrial developments in the Corby area. The planned further expansion of Corby and the new garden village at Deene, will cause even heavier traffic along the A43.

Currently at peak times it can take up to five minutes to exit Fineshade and one resident has counted 87 vehicles passing before being able to exit.

The additional use of Top Lodge as a camping and glamping site would cause more problems at the junction and expose yet more visitors to danger as they negotiate their entry to and exit from the single track lane.



*Yet another accident at the A43 junction*



- As well as visitors' cars, the single-track lane is already and increasingly used by cyclists as well as by large vehicles including campervans, towed caravans, and horseboxes. Fineshade Wood is still a working wood with forestry vehicles and timber lorries using the lane, as well as residents moving trailers and increasing numbers of delivery vans and lorries throughout the week. Forestry England's vehicle-counters have recorded up to 1500 vehicle movements in a single day entering their car parks. A resident's CCTV has recorded 153 vehicle movements per hour at during a recent bank holiday.

The road surface is not regularly maintained, and pot holes and deterioration of the surface takes place, especially following the winter period. This is particularly severe at the ends of the passing places because so many vehicles are having to use these particularly at peak times.

Such is the difficulty and delay in negotiating the lane, on recent occasions ambulances have been reluctant to attempt access and the air-ambulance has been called. There are already major concerns about blockages to the lane preventing access by Fire Engines and other emergency vehicles. Please see the detailed Public Objection by a local retired fireman. (Objection dated 3 May)

If the application were to be allowed there would be a significant further increase in heavy traffic during the construction phase as well as yet more visitor traffic once the site becomes operational.



*The single-track lane with passing places*

- The proposed access to the camping site is directly onto the existing 4-way junction in front of the Visitor Centre. Traffic coming up from the A43 currently splits into four paths, a small car park on the immediate left, the caravan park, the main visitor centre car park straight ahead and a fork to the right for residents and visitor centre staff.

Vehicles turning right into the proposed site will be crossing traffic exiting from all four existing areas and also across the bridle path, the Jurassic Way, the cycle path and the start of the pathway to the Gruffalo trail.



*The proposed site entrance*

The Parish Council is also concerned by the validity of the analysis in the RPS report, “Fineshade Transport Statement”, which leads to the absurd statement in Section 5.25

“Top Lodge Road is not heavily trafficked on a typical weekend, Saturday or Sunday whether during term time or holiday time”.

This analysis carried out by the applicant relies heavily on data collected in 2014 and 2019, data that were contested vigorously in responses to previous applications. For example, the almost illegible Trip Rate Calculator, supplied in Appendix F, is a desk-based exercise based on three caravan parks in Dorset, West Midlands and Co. Down and uses data in the date range 01/01/2008 to 18/07/2011, over 10 years ago! What possible relevance can this have?

As with other parts of the application, the Transport Statement is based on outdated, irrelevant, incomplete data, uses inept analysis and draws erroneous conclusions.

But a point of major concern is in section 4.6 of the Transport Statement where there is reference to:

“the movement of additional timber lodges and pods”.

***The Parish Council believes that could be an indication of the true intention of this Change of Use application. Once “Change of Use” is agreed what is to prevent planning mission creep eventually allowing timber residential lodges as operated by Countrywide Park Homes, the company behind this application.***

#### **6) Setting of the Grade-II listed building, Top Lodge**

This Parish Council objects to the application because of the scant regard in the applicant’s Heritage Statement given to the *setting* of the eighteenth century farmhouse with attached barn granary, outbuildings and shelter sheds.

We agree entirely with the detailed comments provided in the Public Comments submitted by Mr Tom Murie (Objection dated 30 April)

In particular the proposed development will disrupt the established field pattern and diminish the direct relationship between Top Lodge and its **only remaining** historical

grazing meadow. This will have the effect of making it more difficult to read the historic connection between Top Lodge and its agricultural role and setting.



*The setting of Top Lodge farmhouse, viewed from the meadow*

Just as in the previous applications for this site, the Heritage Assessment particularly fails to take full account of public appreciation of the significance of the building's setting and again comes up with a "no harm" assessment, despite being criticised by the previous Planning Officer in his Committee Report dated 31/07/2019.

This proposed development would have an adverse effect on the overall character of the location. Glamping Pods in their design alone will stand out harshly against the traditional background normally experienced from an open countryside setting.

***Like so many of the other Application Documents the Heritage Assessment is riddled with errors and inconsistencies and fails to make a convincing case that the setting and character of the Top Lodge area could be preserved, let alone enhanced, by changing a grazing meadow into a camping site.***

## **7) Wider landscape issues**

The Parish Council objects to the application because it fails to safeguard or enhance a important view or vista as required by the Joint Core Strategy Policy 3c.

The emerging Neighbourhood Plan includes the following policy on Protection of Important Views and lists the view West from Top Lodge, Fineshade as the first of five such important views.

**POLICY ENV 10: PROTECTION OF IMPORTANT VIEWS** – Views around Duddington and Fineshade and across the parish (figure 19) are important to the setting and character of the settlements and the wider Plan Area. They are highly valued by residents. To be supported, development proposals must not significantly harm the following views or their viewpoints, which are at publicly accessible locations. Proposals affecting them should include individual *treatment of view* design statements.

### **1. West from Top Lodge, Fineshade**

Looking over the site from Top Lodge or the public path running along the north-eastern boundary one can enjoy views of a traditional grazing meadow, inextricably linked to its neighbouring woodland, and the openness beyond it, which serves to connect the area with its wider and deeper hinterland. This is part of the Rockingham

Forest Character area whose landscape, as described by Natural England, is a patchwork of woodland and large to medium fields of mixed arable with some pastoral use.

The Parish Council agrees strongly with the detailed assessments and criticisms of the applicant's Landscape and Visual Impact Assessment provided in the Public Comments submitted by Mr Niall Rudd. (Dated 17 May 2021).

***Even a few tents and parked vehicles in the foreground, together with the paraphernalia of a campsite would significantly harm this view, let alone the static caravans which we believe to be the ultimate objective of this planning application.***



*View across the meadow in winter*

The Parish Council trusts that the above comments will be given full consideration when the application is determined.

Yours faithfully

***Richard Reed.***

Richard Reed  
Clerk to Duddington-with-Fineshade Parish Council.