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For and on behalf of
D&GO Limited

PLANNING STATEMENT

**Lowther House, Main Road,
Shurdington,
GL51 4XF**

**Prepared by
DLP Planning Ltd
Bristol**

November 2023



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0.0 EXECUTIVE SUMMARY

- 0.1 DLP Planning Ltd have been instructed by D&GO Limited to submit a full planning application to Tewkesbury Borough Council for the change of use of land into a camping facility. The proposal includes the introduction of five temporary Shepherd huts, designed to be operational for up to nine months of the year, offering a unique outdoor recreational experience. This statement forms part of the submission and should be read in conjunction with all other submitted plans and documents.
- 0.2 The development, featuring eco-friendly Shepherd Huts with integrated facilities, will provide a new destination for tourists to enjoy the surrounding countryside of Gloucestershire. In addition, the statement confirms that the proposal is deemed appropriate development within the Green Belt, as defined by paragraph 150 of the Framework.
- 0.3 The site includes safe and sustainable transport access, as determined by the local authority in application 20/00623/FUL, with sufficient parking and electric vehicle charging points. In addition, the proposal's commitment to sustainability is further exemplified by the creation of a wildflower meadow, which would significantly contribute to local biodiversity.
- 0.4 The proposal is acceptable in principle, complying with the relevant Development Plan policies. This statement has assessed all other relevant planning considerations and found that the scheme is fully compliant with the Development Plan and other material policy considerations, including national policy and the pursuit of sustainable development.

1.0 INTRODUCTION

1.1 This Planning Statement is submitted in support of the full planning application seeking permission for a change of use of land into a camping facility (Sui Generis), with the introduction of five temporary structures in the form of Shepherd huts. It is proposed that the temporary structures are in position for up to nine months of the year.

1.2 This Statement sets out the main planning considerations and justifications for the scheme. In support of the application, this Statement demonstrates that the proposed scheme is acceptable in principle and expands upon issues relating to the Green Belt, camping sites and local tourism, design and visual amenity, access and parking, and the environmental and biodiversity impact.

1.3 The application submitted comprises the following plans and documents.

- Location Plan via Planning Portal
- Transport Note by Rappor (Nov 2023)
- 230651-RAPP-XX-XX-DR-L-8010 - Landscape Strategy by Rappor (Oct 2023)
- 7206-03OCT23-02 - Topographical Survey

1.4 This statement should be read in conjunction with the plans and documents that make up the application as a whole.

2.0 SITE AND SURROUNDINGS

2.1 The application site is located at Lowther House, Main Road, Cheltenham, GL51 4XF. The site is positioned within the Green Belt of Cheltenham, characterised by its open grassland that is adjacent to the settlement of Shurdington. This is illustrated in **Figure 1**.



Figure 1 – Site Location (taken from Google Maps)

- 2.2 Access to the site is facilitated via Main Road, which ensures convenient connectivity to the broader Cheltenham region. Furthermore, existing internal pathways and tracks can be optimised to provide internal circulation within the proposed camping site.
- 2.3 The site predominantly comprises open meadow, combined with occasional trees and shrubs. The presence of built structures towards the southern boundary, adjacent to Main Road, are residential and ancillary in nature.
- 2.4 Set within a mixed-use environment, the site is surrounded by residential dwellings, particularly to the southeast, and expansive green spaces. Historically, given the presence of tracks, there may have been some agricultural or pastoral activities.
- 2.5 The site, while situated within the Green Belt, does not fall within either a Conservation Area

or an Area of Outstanding Natural Beauty (AONB). In addition, the entirety of the site is classified within Flood Zone 1, which indicates a low risk of flooding.

3.0 DEVELOPMENT PROPOSAL

3.1 This application seeks planning permission for a change of use of land site into a camping facility (Sui Generis), with the introduction of five temporary structures in the form of Shepherd Huts. These huts are designed to be in position for up to nine months of the year, aligning with the seasonal nature of the facility. This development seeks to offer a unique outdoor recreational experience, combining camping with modern conveniences. The proposed Landscape Strategy is shown below in **Figure 2**.

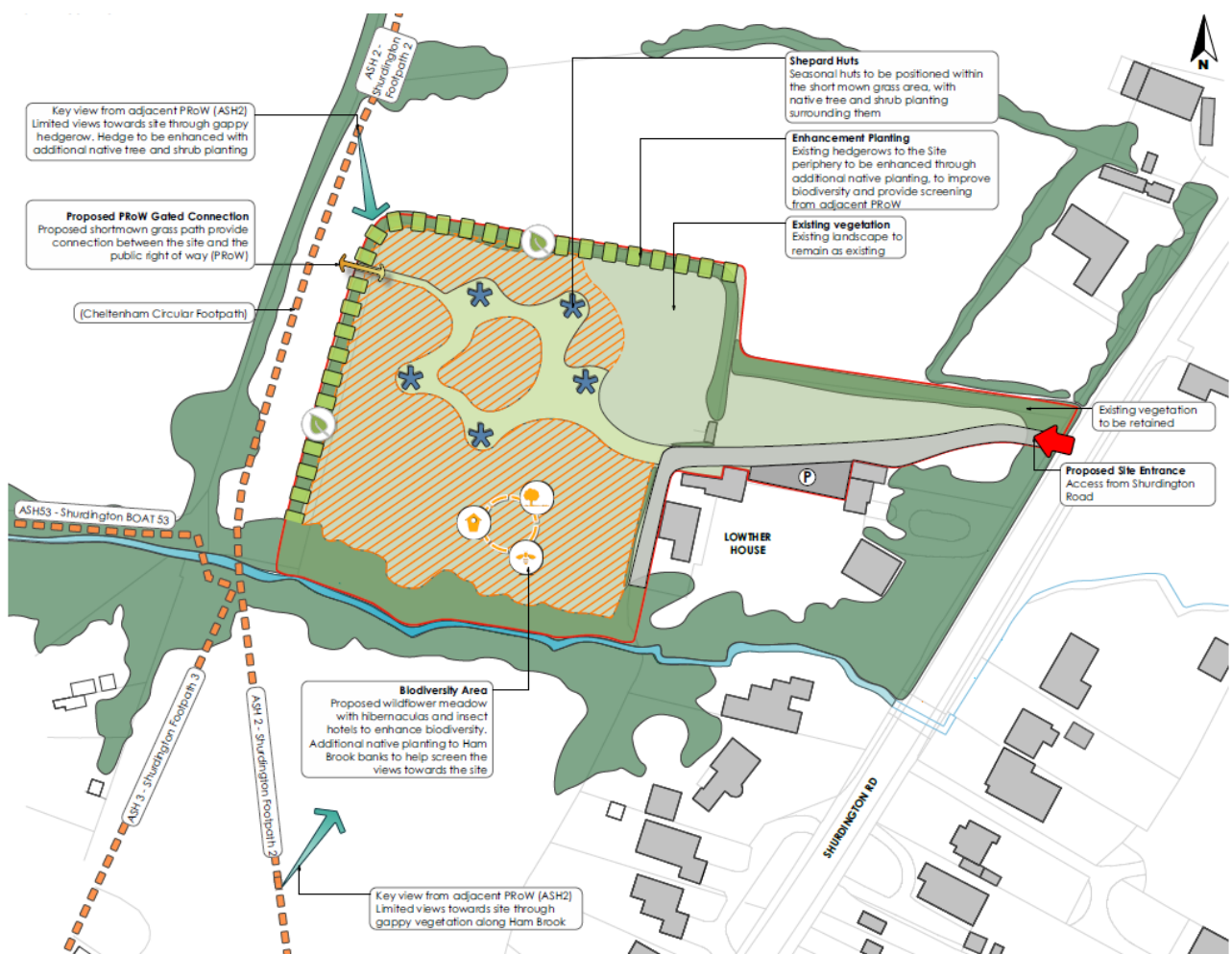


Figure 2 – Landscape Strategy

3.2 Each Shepherd Hut is self-contained, featuring integrated facilities including a shower and toilet, ensuring convenience and comfort for visitors. The design of these huts harmonises with the natural surroundings, offering an immersive nature experience while minimising the visual impact on the landscape. The proposed layout and positioning of the huts on the site have been carefully planned to maximise privacy, provide ample natural light, and ensure

easy access to the surrounding natural beauty. From an environmental perspective, the proposed development includes the creation of a wildflower meadow around the huts, which will enhance biodiversity and provide an aesthetically pleasing natural habitat for local wildlife.

- 3.3 The proposed development of this camping facility serves multiple purposes. It would provide a tranquil retreat for tourists and outdoor enthusiasts but also contribute to the local economy by attracting visitors to the area. The seasonal nature of the development ensures minimal long-term impact on the site, preserving its greenfield use outside of operational months. This approach reflects a commitment to sustainable development and environmental protection.
- 3.4 The Shepherd Huts are constructed using eco-friendly materials and incorporate sustainable features such as waste minimisation and energy efficiency. The introduction of facilities within each hut reduces the need for additional infrastructure on the site, further preserving the natural setting. This development proposal represents a careful balance between offering a unique outdoor experience and maintaining the integrity and beauty of the greenfield site.

4.0 PLANNING HISTORY

4.1 A review of the Council's online planning register shows the following applications which are of relevance to this application:

- 19/00065/FUL
Demolition of first floor and single storey side extension and erection of single and 1.5 storey side and rear extensions.
Withdrawn.
- 19/00064/FUL
Demolition of existing extensions and erection of replacement two storey rear and single storey side and rear extensions.
Permitted.
- 19/00673/FUL
Demolition of first floor and single storey side extension and erection of single storey side and rear extensions (resubmission of 19/00065/FUL).
Permitted.
- 20/00018/NMA
Non-material amendment for planning application 19/00673/FUL.
Permitted.
- 20/00292/FUL
Retention of engineering operations to form a new access track from Shurdington Lane, to serve the Coach House.
Refused.
- 20/00623/FUL
Engineering operations to upgrade an historic access track.
Permitted.

4.2 The planning history of Lowther House predominantly centres on modifications to existing structures and adjustments to access tracks. Notably, applications have sought to enhance side and rear extensions, alongside refining site connectivity through track enhancements. This narrative reflects consistent efforts to optimise the sites layout and use.

5.0 PLANNING POLICY CONTEXT

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions should be made in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan

5.2 The Development Plan policy context for the site and the surrounding area is provided by the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy 2011-2031, and the Tewkesbury Borough Plan 2011-2031. There are other documents within the areas Development Plan framework, however, they are not relevant to this application.

Cheltenham, Gloucester and Tewkesbury Joint Core Strategy 2011-2031

5.3 The Cheltenham, Gloucester and Tewkesbury Joint Core Strategy 2011-2031 (the Core Strategy) was adopted in December 2017. The most important policies to determine this application are:

- SD3: Sustainable Design and Construction
- SD4: Design Requirements
- SD5: Green Belt
- SD6: Landscape
- SD9: Biodiversity and Geodiversity
- SD14: Health and Environmental Quality
- INF1: Transport Network
- INF6: Green Infrastructure

Tewkesbury Borough Plan 2011-2031

5.4 The Tewkesbury Borough Plan was adopted on 8th June 2022. As a development plan document, the plan carries full weight in decision making. The most important policies to determine this application are:

- EMP4: Rural Employment Development
- EMP5: New Employment Development (General)
- TOR1: Tourism Related Development
- TOR2: Serviced/self catering accommodation
- TOR3: Caravan and camping sites
- GRB4: Cheltenham – Gloucester Green Belt
- LAN2: Landscape Character
- NAT1: Biodiversity, Geodiversity and Important Natural Features
- NAT3: Green Infrastructure: Building with Nature
- TRAC9: Parking Provision

National Planning Policy Framework

- 5.5 The National Planning Policy Framework (The Framework) was revised on 5th September 2023. The Framework sets out the Government’s economic, environmental and social planning policies for England and details how these are expected to be applied. It is, in itself, a material consideration in planning decisions.
- 5.6 The Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development, which can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. This means “*approving development proposals that accord with an up-to-date Development Plan without delay*” or “*where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out of date, granting permission unless: i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the*

policies in this Framework as a whole.”

5.7 The Framework defines the three overarching objectives of sustainable development as:

An Economic Objective – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

A Social Objective - *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

An Environmental Objective – *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

5.8 These objectives should be delivered through the preparation and implementation of plans and the application of policies in the Framework; they are not criteria against which every decision can or should be judged. Planning decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

5.9 Paragraph 218 of the Framework advises that the policies within the Framework are material considerations which should be taken into account in dealing with applications from the day of its publication.

5.10 Paragraph 219 of the Framework advises that existing policies should not be considered out-of-date simply because they were adopted or made prior to publication. Due weight should be given to them, according to their degree of consistency with the Framework and that the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given.

5.11 Section 12 of the Framework provides context to design within planning. Paragraph 126

states “*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.*”

5.12 Section 13 of the Framework provides guidance on protecting Green Belt land. Paragraph 149 states “*A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:*

- A. *buildings for agriculture and forestry;*
- B. *the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- C. *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- D. *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- E. *limited infilling in villages;*
- F. *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- G. *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - *not have a greater impact on the openness of the Green Belt than the existing development; or*
 - *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*

5.13 Paragraph 150 states that “*Certain other forms of development are also not inappropriate in*

the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

a) mineral extraction;

b) engineering operations;

c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;

d) the re-use of buildings provided that the buildings are of permanent and substantial construction;

e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

f) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.”

5.14 Section 9 of the Framework provides guidance on promoting sustainable transport. Paragraph 111 states *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

Appropriate Weight

5.15 Regarding the weight that is given, Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, determination of applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise. In this instance, full weight is given to the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy 2011-2031 and Tewkesbury Borough Plan 2011-2031 as they form the Development Plan.

5.16 As it forms the basis of Government policy for planning applications, substantial weight should be given to the policies of the Framework.

6.0 PLANNING CONSIDERATIONS

6.1 Having regard for the proposed development; the sites planning history; the relevant planning policy context; and all other material issues; the main planning considerations for the determination of this application relate to principle of development, Green Belt, camping facility and local tourism, design and visual amenity, access and parking and the environment and biodiversity impact.

Principle of Development

6.2 The main policy considerations relating to the principle of development are set out by SD5: Green Belt, Section 13 of the Framework, TOR1: Tourism Related Development and TOR3: Caravan and camping sites.

Impact on Green Belt

6.3 Policy SD5 states that *“To ensure the Green Belt continues to serve its key functions, it will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. That is: ‘whether very special circumstances exist to outweigh the harm automatically caused to the Green Belt by virtue of the development being inappropriate and any other harm actually caused’.*

6.4 Paragraph 138 of the Framework defines the five principal purposes of the Green Belt:
“Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

6.5 Paragraph 149 of the Framework states that *“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: ...
b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not*

conflict with the purposes of including land within it;

6.6 Importantly, paragraph 150 of the Framework states that “*Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are: ...*

e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds);”

6.7 The proposed camping facility represents a change of use application designed to facilitate outdoor activities, such as hiking and wildlife watching for tourists. Under Paragraph 150 of the Framework, such a change of use for outdoor recreation is deemed appropriate development within the Green Belt. The development includes temporary Shepherd Huts, which due to the nature of the structures would not be classified as buildings. Nonetheless, it's important to note that even if a building were proposed, Paragraph 149 of the Framework would still consider it appropriate for the Green Belt, provided it serves outdoor recreation purposes.

6.8 Paragraph 150, while endorsing outdoor recreation developments, requires that such proposed developments preserve the Green Belt's openness. The Shepherd Huts, designed to be temporary and in place for only nine months annually, directly align with this objective. Their temporary nature and small scale mean that their presence in the Green Belt does not conflict with the Framework's objectives. The proposed development ensures that the introduction of the huts into the Green Belt is in harmony with the overarching policy aim of maintaining its openness.

6.9 With respect to the five purposes of the Green Belt as defined by paragraph 138 of the Framework, the proposed development has been carefully considered to ensure it does not harm these strategic objectives:

- A. The development does not contribute to the unrestricted sprawl of large built-up areas. The Shepherd huts, due to their small scale and temporary nature, do not extend urban areas into the Green Belt.
- B. The camping facility will not lead to the merging of neighbouring towns, as it is a low-density development and well-integrated within the existing landscape.

- C. The proposal aids in safeguarding the countryside from encroachment. The huts will be sited in a manner that respects the existing topography and natural features, thus preventing encroachment into the countryside.
- D. The development is designed to preserve the setting and special character of historic towns. By facilitating a form of tourism that values and promotes the local heritage, the proposal helps to conserve the historic environment.
- E. The proposed development is aiming at rural tourism, thus not taking away from any potential to recycle existing derelict or underutilised land within towns.

6.10 By supporting outdoor recreation through the provision of temporary and discreetly sited Shepherd Huts, the proposal is consistent with the purposes of the Green Belt as outlined in the Framework. It does not lead to permanent changes to the land, nor does it result in a greater footprint of development within the Green Belt.

6.11 In conclusion, the proposed development of a camping facility with temporary Shepherd Huts for 9 months of the year meets the very special circumstances required to justify development within the Green Belt. It provides an appropriate facility for outdoor recreation that is temporary, respects the openness of the Green Belt, and is in harmony with the defined purposes of Green Belt policy as outlined in the Framework.

Camping facility and Local Tourism

- 6.12 Policy TOR1 *“Tewkesbury Borough Council will support proposals for tourism related development and extensions to existing tourist development provided that:*
1. *Where possible the proposal should involve the appropriate conversion and re-use of existing buildings;*
 2. *There is good inclusive access for all potential users;*
 3. *The proposal supports the plan’s wider objectives, particularly in relation to conservation, transport, health, heritage conservation, recreation, economic development, the environment and nature conservation;*
 4. *The siting, design and scale is in keeping with the built, natural and historic environment setting and wherever possible and practicable seeks to enhance it;*
 5. *There is no unacceptable impact on the safety or satisfactory operation of the highway network.*

6. Where a proposal would attract substantial numbers of visitors it should be accessible by all modes of transport, including public transport as appropriate to scale of the proposal.”

- 6.13 Policy TOR3 states that *“Proposals for new or extended caravan and camping sites for tourist accommodation should be located within or adjacent to existing settlements as identified on the Policies Map or existing sites of tourism or hospitality facilities and accommodation. Proposals for new sites within the open countryside will need to demonstrate why the proposed location is essential.*

All proposals must be of a scale commensurate with the surrounding area, including the scale of existing settlements. In considering all proposals, overriding protection will be afforded to the landscape and character of the area, particularly with regard to siting, topography and landscape design, as well as to the amenity of any neighbouring uses. The number and size of any associated new buildings (i.e. toilet and washing facilities) shall be kept to the minimum necessary and proposals make use of existing buildings for such purposes where possible”.

- 6.14 The proposed development of a camping facility with Shepherd Huts at the site is in alignment with Tewkesbury Borough Council’s Policy TOR1 regarding tourism-related development. Each specific criterion of the policy has been carefully considered and addressed as follows:

1. **Conversion and Re-use of Existing Buildings:** While the proposal introduces temporary Shepherd Huts rather than converting existing structures, it does so with a view towards minimal impact and reversibility. This approach is in the spirit of utilising land for tourism without long-term alteration to the landscape, which parallels the policy's preference for adapting existing sites.
2. **Inclusive Access for All Users:** The development ensures inclusive access, with the design of the Shepherd Huts and associated facilities considering a range of mobility needs. Access paths and public areas will be created to be navigable for all visitors, ensuring a welcoming and inclusive environment.
3. **Supporting Wider Plan Objectives:** The proposal actively supports the wider objectives of the development plan. It promotes conservation through the creation of a wildflower meadow and other biodiversity enhancements. By facilitating outdoor

recreation, it contributes to health and well-being. The development supports economic growth by attracting tourists, which in turn benefits local businesses and services. Heritage conservation is respected by the site's low-impact design, ensuring that the historical landscape is preserved.

4. **Siting, Design, and Scale:** The Shepherd Huts are carefully sited to blend with the landscape, avoiding any detrimental visual impact. The scale is modest, and the design is sympathetic to both the natural and historic environment. Furthermore, the landscape plan includes measures to enhance the site's setting, thus fulfilling the policy's enhancement criterion.
5. **Highway Network Impact:** The proposed development is expected to generate minimal traffic, given the small number of huts and the seasonal nature of the operation. A traffic impact assessment can be conducted if required, but it is anticipated that there will be no significant adverse effect on highway safety or operation.
6. **Accessibility by All Transport Modes:** While the scale of the proposal is not substantial, efforts have been made to ensure accessibility by various transport modes. Information will be provided to visitors on public transport options, and the site will include provisions for secure bicycle parking to encourage sustainable travel choices.

6.15 Additionally, the proposed development aligns with Policy TOR3's stipulations for new or extended caravan and camping sites. Located adjacent to Shurdington, the development respects the policy's preference for proximity to existing settlements, ensuring integration with the local community and landscape while providing accessible amenities and services.

6.16 The development's scale is also carefully considered to be in harmony with Shurdington's character. With just five Shepherd Huts, it maintains a scale that is both appropriate and proportionate to the settlement, adhering to the policy's emphasis on the scale being appropriate with the surrounding area. This mindful scaling ensures that the development remains in line with the character and scale of the local area, avoiding any disproportionate impact on the settlement.

6.17 In line with Policy TOR3's focus on landscape and character protection, the proposal not only

safeguards the existing landscape through its temporary and low-impact nature but also enhances it. The inclusion of wildflower planting and other biodiversity improvements enhances the ecological value and visual appeal of the site, reflecting the policy's directive for landscape design and character preservation. This approach demonstrates a commitment to enhancing the area's natural beauty and biodiversity.

- 6.18 In addition, the development has been designed with an awareness of the neighbouring amenities and uses. The discreet placement and low number of units ensure minimal visual and environmental impact, respecting the local topography and existing land uses. This consideration extends to the provision of facilities within the development. In adherence to Policy TOR3's guidance on minimising new buildings for ancillary facilities, each Shepherd Hut will be self-contained with its own facilities, including chemical toilets. This design choice eliminates the need for additional structures, further preserving the openness and character of the countryside.
- 6.19 In conclusion, the proposed development of a camping facility with five Shepherd Huts successfully meets the criteria of Policies TOR1 and TOR3, demonstrating its acceptability in principle. It aligns with TOR1 by promoting tourism in a manner that respects the local environment and community and adheres to TOR3 through its sensitive siting and scale, alongside a commitment to landscape and character preservation. This careful consideration of policy requirements ensures that the development is both supportive of tourism and mindful of its environmental and community impact.

Design and Visual Amenity

- 6.20 Policy SD4 states that *"New development should enhance comfort, convenience and enjoyment through assessment of the opportunities for light, privacy and external space, and the avoidance or mitigation of potential disturbances, including visual intrusion, noise, smell and pollution."*
- 6.21 The proposed Shepherd Huts camping facility aligns with Policy SD4 by enhancing guest comfort and minimising disturbances. The huts are positioned to maximise natural light and ensure privacy, avoiding overlooking or intrusion. This is further enhanced by the rural location with minimal neighbours, contributing to a sense of seclusion and tranquillity for guests. The development includes attractive external spaces, such as a wildflower meadow, promoting outdoor enjoyment and a connection with nature.

6.22 To minimise visual intrusion, the huts are designed with a low profile and wooden materials that blend into the natural surroundings. The activities associated with the facility, such as hiking, are expected to generate minimal noise, maintaining the tranquil character of the area. Furthermore, each hut will be equipped with eco-friendly, self-contained facilities to mitigate any potential issues with smell and pollution. This environmentally considerate approach ensures a balance between providing a high-quality visitor experience and respecting the local environment, in line with Policy SD4.

Access and Parking

- 6.23 Policy INF1 states that *“Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:*
- i. Safe and efficient access to the highway network is provided for all transport modes;*
 - ii. Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use;*
 - iii. All opportunities are identified and taken, where appropriate, to extend and / or modify existing walking, cycling and public transport networks and links, to ensure that credible travel choices are provided by sustainable modes.”*
- 6.24 Policy TRAC9 states that *“Proposals for new development that generate a demand for car parking space should be accompanied by appropriate evidence which demonstrates that the level of parking provided will be sufficient.”*
- 6.25 In addition to the Development Plan, the Framework, at paragraph 111, states that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*
- 6.26 As part of the application, a Technical Note (TN) has been conducted to assess the proposed parking and the overall impact the proposed development would have on the local highway network. The TN outlines that the site's accessible location near various amenities and its proximity to Cheltenham and Brockworth Village, along with nearby bus services, enhance connectivity and encourages sustainable travel.
- 6.27 Additionally, the vehicular access to site is via a Tewkesbury Borough Council approved

access on Shurdington Road (A46), as indicated in planning application reference 20/00623/FUL, which confirms that the access is safe and suitable. This approval, combined with a pedestrian entry point and an internal track serving as a shared surface, ensures efficient and safe movement within the site.

- 6.28 The parking plan includes six spaces, one per Shepherd Hut, incorporating Electric Vehicle Charging (EVC) points, which aligns with modern sustainable transport needs. This parking strategy is designed to meet the site's requirements while preventing disorganised parking.
- 6.29 The TN concludes that the forecasted trip attraction from the development, considering its seasonal nature, will not adversely impact highway safety or lead to severe cumulative impacts on the road network.
- 6.30 In conclusion, the development's approach to access and parking adheres to Policies INF1 and TRAC9, and the Framework. The planning, including the local authorities-approved safe access (Ref: 20/00623/FUL), adequate parking with EVC points, and sustainable transport considerations, ensures that the development offers credible and environmentally friendly travel choices. This integration with the existing transport network, without harmfully impacting highway safety or efficiency, demonstrates the development's commitment to a sustainable transport solution, in line with policy requirements.

Environmental and Biodiversity impact

- 6.31 Policy SD3 states that *“Development proposals will demonstrate how they contribute to the aims of sustainability by increasing energy efficiency, minimising waste and avoiding the unnecessary pollution of air, harm to the water environment, and contamination of land or interference in other natural systems.”* Furthermore, SD3 states that *“All development will be expected to incorporate the principles of waste minimisation and re-use.”*
- 6.32 Policy SD9 states that *“The biodiversity and geological resource of the JCS area will be protected and enhanced in order to establish and reinforce ecological networks that are resilient to current and future pressures. Improved community access will be encouraged so far as is compatible with the conservation of special features and interests.”*
- 6.33 The proposed Shepherd Huts have ensured that the development is both sustainable and energy efficient. Designed with an eco-conscious approach, the huts use sustainable

materials and feature high-quality insulation to minimise energy needs. Maximising natural light and incorporating passive heating and cooling strategies further reduce electricity consumption, highlighting the development's commitment to energy efficiency.

- 6.34 In terms of waste minimisation and environmental protection, the development adheres to the principles of reuse and responsible resource management. Materials are chosen based on their recycled content and sustainability, and the huts' removable nature enhances their potential for reuse. Eco-friendly toilets also ensure minimal environmental impact, avoiding pollution of air, water, and land.
- 6.35 The proposed change of use to a camping facility also aligns with Policy SD9 by enhancing biodiversity and ecological networks through its landscape plan, which includes the introduction of wildflower meadows. This initiative boosts local biodiversity, aligning with the policy's aim to reinforce resilient ecological networks. The development's sustainable design minimises land disturbance, preserving geological features. Additionally, by providing a nature-oriented camping facility, the development encourages community engagement with the local environment in a way that respects conservation principles.
- 6.36 In summary, the proposed development aligns with Policies SD3 and SD9 by emphasising sustainable design, energy efficiency, and waste minimisation. The incorporation of eco-friendly materials, waste reduction strategies, and the enhancement of local biodiversity through a thoughtful landscape plan demonstrate a strong commitment to environmental sustainability. Furthermore, the development enhances ecological networks and encourages community access to nature, aligning with the conservation goals of these policies. This approach underscores the development's compatibility with key sustainability and environmental objectives.

The Objectives of Sustainable Development

- 6.37 Paragraph 8 of the Framework sets out the three overarching objectives of sustainable development. These are independent and need to be pursued in mutually supportive ways, so that opportunities can be taken to secure new gains across each of the different objectives. As previously described, these objectives are economic, social and environmental.

An Economic Objective

- 6.38 The proposed development will positively impact the local economy. By attracting tourists, it

will stimulate economic activity in the area, benefiting local businesses such as restaurants, shops, and recreational service providers. The development also presents opportunities for job creation, both directly through the operation of the facility and indirectly in the broader tourism sector. Furthermore, its positioning as an eco-friendly and sustainable tourism destination caters to a growing market of environmentally conscious travellers, offering a unique selling point that can boost local economic growth.

A Social Objective

- 6.39 Socially, the development enhances community engagement and wellbeing. It provides a new space for recreation, fostering social interactions among visitors and local residents alike. The emphasis on outdoor activities, such as hiking and wildlife watching, promotes physical and mental health, encouraging a healthy and active lifestyle. Additionally, the facility provides an accessible space for people to connect with nature, enhancing the overall social value of the area.

An Environmental Objective

- 6.40 Environmentally, the development is designed with sustainability and conservation at its core. The inclusion of features like wildflower meadows not only beautifies the area but also boosts local biodiversity, contributing to ecological health. The eco-friendly design principles, including the use of sustainable materials and waste minimisation strategies, ensure a minimal environmental footprint. The focus on energy efficiency and preserving natural resources, such as minimising land disturbance, aligns with conservation principles, safeguarding the area's natural beauty and geological features for future generations.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 The application seeks permission for the change of use of land to establish a sustainable camping facility, featuring five temporary Shepherd Huts operational for up to nine months of the year. The development is designed to offer outdoor recreation with modern amenities, enhancing the area's appeal and biodiversity.
- 7.2 The proposal adheres to local planning policies and the Framework, by ensuring the Shepard Huts are temporary structures that do not harm the Green Belt. Furthermore, the implementation of wildflower meadows ensures that the sites biodiversity is significantly improved. The site's transport and access arrangements are safe, efficient, and sustainable, with adequate parking and electric vehicle charging points. In addition, the development supports local tourism, which brings economic benefits to the local community.
- 7.3 This Statement has reviewed the relevant Development Plan Policy Framework as it applies in this case, together with the other material considerations. On the evidence presented, it has been demonstrated that the proposal accords with all relevant Development Plan policies and national guidance, and there are no other material considerations present to override them.
- 7.4 It is therefore urged that the Local Planning Authority grant planning permission for this sustainable development.



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