

Application No. 22/03234/FUL: Retrospective - for the siting of two fishing lodges, pier and ancillary works to access and track

Carham Parish Council has reviewed this retrospective application, and our comments are below. We feel obliged to add that this retrospective application does not appear to cover all of the development work that is being carried out at the site.

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Carham Parish Council understands that there is a need for farm and rural diversification, but it objects to this application on the grounds that it is a permanent development on a greenfield site in open countryside that does not meet the National Planning Policy Framework criteria for sustainable development or, by extension, the Local Plan's ambition "to encourage sustainable development through growing the economy, supporting healthy and vibrant communities and contributing to protecting and enhancing the natural ... environment of Northumberland" (4.50, page 50).

Economic growth

We note that the applicant cites Policy ECN 14 in support of the application ("Rural diversification developments will be supported if the proposed use is ... for leisure, recreation or tourism activities that require open land in a countryside location") but we cannot see how this Policy applies to this development. Lake-side accommodation is not necessary for fishermen (who do not need to sleep next to the place where they are fishing) or for holidaymakers (for whom fishing is, according to the advertisements we have seen for this development, ancillary to the holiday). If new permanent accommodation or temporary holiday accommodation is required for these kinds of visitors, it could and should be located within the curtilage of the existing farm settlement at East Learmouth, which is easily reached on foot from the lake (Policy ECN 15). This would enable diversification, while still making use of the lake for its implied primary purpose (fishing).

The community

The lake-side fishing lodges development is of no benefit to the local community. The applicant cites Policy ECN 13, which is to do with meeting rural employment needs, but the application form states that the development has not created any employment opportunities. So, there are no jobs for local people.

The development is in an isolated position, outside the curtilage of East Learmouth farm, with no shops or other services in the vicinity. This means that the local community does not benefit from any visitor spend.

The environment

1. Policy ENV 1 recognises that non-designated sites may nevertheless be irreplaceable and may have qualitative attributes ... and that development outwith designations can have indirect impacts on designated sites. The site of the fishing lodges is low-lying, in an area that would have been wetland before agricultural practice changed it. Although not designated, the site is part and parcel of the local ecosystem and close to some important sites. It is just 1,200 m from the River Tweed (an SSSI), close to two other SSSIs, and near to two local wildlife and geological sites that are identified on the Local Plan. The lake itself, which has an island providing safety

from predators, is the largest body of inland water in the area. Until development began and visitors started using the fishing lodges and the lake, the site was a place where large numbers of a wide variety of wildfowl gathered and nested. These have been driven away by the building work and visitor activity, which online video footage shows has included the use of a jet-ski on the lake. No nesting has taken place this year. This means that this development is completely at odds with Policy STP 3-f, which says that development proposals will be expected to contribute to net gains for biodiversity and establish a coherent and resilient ecological network.

2. The development does not appear to have made any concessions to Policy STP 4, which states that development proposals should mitigate climate change and contribute to meeting nationally binding targets to reduce greenhouse gas emissions. Building on a greenfield site (previously pasture) and putting in a track to the site has meant a loss of 3,000 m² (our estimate) of land that was capturing carbon. The development is in a location where there is no public transport, so visitors using the lodges have to use a car. The lodges themselves are new-builds, made of new materials, and they have hot tubs, which consume energy. Use of the lodges has introduced light at night (Policy ENV 4) to a previously dark area.

Carham Parish Council accepts that there is an argument for economic growth through diversification, and we are not against the development of new residential or tourist accommodation for this purpose, but the disbenefits of this lake-side development far outweigh the argument for economic growth, and so we must object to it.

Carham Parish Council
20 October 2022