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## ADDENDUM TO PLANNING STATEMENT – PROPOSED CAMPING/GLAMPING SITE – LOWER BRAYSHAW, TOSSIDE, BD23 4SU

This current scheme seeks planning permission for six camping/glamping units; five pitches for motorhome (no caravan pitches proposed); an area for an of camping pitches; a small modular toilet & shower block; a cycle parking shelter, and a wildlife pond.

This Addendum is submitted to support the resubmission of planning application 2022/23716/FUL which sought planning permission for the development of a small-scale camping/glamping site on land at Lower Brayshaw, Tosside.

The application was refused by Craven District Council on 21<sup>st</sup> July 2022 without any discussion or engagement for the following reasons:

1. The increase in activity at the site and arising the site from vehicle movements would erode the special qualities of the Forest of Bowland Area of Outstanding Natural Beauty contrary to Craven Local Plan 2012 to 2032 (November 2019) Policy ENVI and National Planning Policy Framework Paragraph 176.
  2. There is no evidential need for the proposal to be located within the Forest of Bowland Area of Outstanding Natural Beauty. The proposal is therefore contrary to Craven Local Plan 2012 to 2032 (November 2019) Policy ENVI.
  3. The site is within an isolated location beyond reasonable access by non-vehicular transport to the necessary facilities and services required for holidaymakers. The development constitutes an unsustainable location of development and fails Craven Local Plan 2012 to 2032 (November 2019) Policies SP2, EC3, EC4 & INF7 and National Planning Policy Framework Paragraphs 104 & 105.
  4. The submitted FRA fails to meet the necessary criteria and does not accurately address flood risk at the site. The proposal, therefore, fails Craven Local Plan 2012 to 2032 (November 2019) Policy ENV6, National Planning Policy Framework Paragraphs 157 & 167 and Planning Practice Guidance Review individual flood risk assessments: standing advice for local planning authorities and Flood risk and coastal change.
  5. The proposal has not followed the sequential approach to development contrary to Craven Local Plan 2012 to 2032 (November 2019) Policy ENV6, National Planning Policy Framework Paragraphs 157, 167 and 168.
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6. The proposal does not amount to either sustainable economic development in the countryside or sustainable tourism. The principle of development is therefore unacceptable and fails Craven Local Plan 2012 to 2032 (November 2019) Policies EC1 and EC3 and National Planning Policy Framework Paragraph 85.

Following receipt of this decision, dialogue with Craven District Council Officers noted that a revised application would need to demonstrate a need and that any development would not have an adverse impact on the special qualities of the AONB. Craven officers suggested further discussion with the AONB officer.

### RESPONSE TO REASONS FOR REFUSAL

Following the above advice, a site meeting was held with Elliott Lorimer, Forest of Bowland AONB Manager, on Monday 28<sup>th</sup> December 2022. This meeting discussed the proposal in more detail with respect to the perceived harm to the AONB. It is noted that prior to the submission of the original application Mr Lorimer was provided with proposed plans for the site and noted that 'the proposal for camping/glamping scheme could be acceptable' with the caveat that he had not visited the site.

The site meeting concluded positively with Mr Lorimer confirming that the AONB Partnership DO NOT have any objections to the proposed development, having now visited the site. It is noted that Mr Lorimer confirmed he would be happy to discuss the scheme and the AONB Partnerships position in more detail with the appointed officer of this revised submission.

In light of the above, we provide our response/comment to the previous reasons for refusal below, in hope that the scheme can be viewed positively by Craven District Council for the benefit of both the District and AONB.

- 1. The increase in activity at the site and arising the site from vehicle movements would erode the special qualities of the Forest of Bowland Area of Outstanding Natural Beauty contrary to Craven Local Plan 2012 to 2032 (November 2019) Policy ENVI and National Planning Policy Framework Paragraph 176.*

It is noted that the location of the site within the Forest of Bowland AONB has been a key consideration from the very start of the project. It is this reason why the AONB Partnership we engaged prior to the submission of the application.

It is noted that NPPF states that 'Great weight should be given to conserving and enhancing the landscape and scenic beauty in Areas of Outstanding Natural Beauty' and that 'the scale and extent of development within all these designated areas should be limited'. It is acknowledged that local plan Policy EN1 re-iterates this point.

The location of the proposed development site within the applicant's landholding was given significant consideration prior to the submission of the original application. Further, this recent site visit with the AONB officer focussed at length on the best location for the proposed use.

Locations closer to the existing farmhouse were discussed; however, it was noted that they would be more impactful being more visually prominent in the landscape and would be affected by the ongoing farming operation at Lower Brayshaw, to the detriment of the enjoyment of potential visitors.

It is noted that whilst the siting is located away from the main farm complex at Lower Brayshaw, the chosen location is considered the least visible within the landscape due to the specific topography of the site, and existing screening offered the site by high-quality drystone walls.

The Officer's report on the earlier submission (2022/23716/FUL) states that 'The Planning Statement suggests views of the site are limited due to topography, from a site visit it was apparent that panoramic views of the site are achievable'. Whilst the site certainly offers spectacular panoramic views out of the site, views into are minimal and only from long-range vistas. As agreed with Mr Lorimer at our recent site meeting, the view of the site is restricted to a stretch of the B6478 c.2km to the south and a short stretch of the road from Tosside. Neither of these vantage points provides direct views of the site. Views from the west are restricted by Gisburn Forest and from the east by topography and the dry-stone walling that marks the boundary of the site.



*Figure 1: Photograph taken towards proposed development site from B6478 c.2km south.*

It was agreed with Mr Lorimer that the existing field boundaries provide significant screening opportunities to the site, particularly from the south and it was suggested that sporadic native planting will be incorporated into the site around the glamping units to help break up their impact upon the setting.

Access to the site will re-instate an old farm track and will consist of crushed local rock. This was suggested by Mr Lorimer to ensure the visual impact of this feature would be minimised by the stone's dull appearance and to reflect the surrounding dry-stone walls. The route of the access track is such that it predominantly 'hugs' the southern dry-stone wall ensuring the visibility of the vehicle movements is well screened and does not erode the landscape qualities. Again, sporadic native tree planting can be incorporated along this wall.

It is considered that the glamping units will be additional features and can be coloured a muted colour that is preferable to both the council and AONB partnership. The only changing feature would be the motorhomes and tents that will be located along the southern dry-stone wall which will effectively screen these features from the long-range views of the site from the south.

It is considered that a condition requiring detail of the proposed planting to provide additional natural screening can be acceptable to address this matter.

The AONB Landscape Character Assessment identifies the site as being within Landscape Character Area LI: Harrop Fold. Within this, the Landscape Character Assessment Report identifies 'a strong sense of remoteness, isolation and tranquillity throughout most of the area' with openness and panoramic views noted with the overall condition considered good albeit faces high cultural and landscape character sensitivity with 'limited capacity to accommodate change without compromising key characteristic'.

It is the 'strong sense of remoteness, isolation and tranquillity' of the site that is being promoted by the applicants and seen as being a key reason for visitors wanting to visit the area.

All the applicant's landholding is located within the Forest of Bowland AONB, albeit on its very edge and as such the development cannot be located outside of the AONB. It is noted that even if the site were in an adjacent field outside the AONB, the development would still be within its setting and its impact on the designated landscape would still be a key consideration.

- 2. There is no evidential need for the proposal to be located within the Forest of Bowland Area of Outstanding Natural Beauty. The proposal is therefore contrary to Craven Local Plan 2012 to 2032 (November 2019) Policy ENV1.*

It is noted that Policy ENV(d) states that within AONBs proposals will be considered on a needs basis, should be in scale with, and have respect for their surroundings and be in line with the AONB or National Park Management Plan objectives.

In summary, the matter of scale and impact upon the landscape qualities of the AONB has been considered above. We now turn to the consideration of the need to have the facility in this location.

The proposed development is submitted to diversify the ongoing farming operations at Lower Brayshaw. Paragraph 84 of the NPPF confirms that Planning policies and decisions should enable the development and diversification of agricultural and other land-based rural businesses and sustainable rural tourism and leisure developments which respect the character of the countryside. Furthermore, Local Plan Objective PO10 seeks to achieve the diversification and growth of the rural-based and farming economy.

The scheme at Lower Brayshaw seeks permission for a broad range of accommodation types including glamping units, motorhome and tent. This range of accommodation types is greater than most such sites within the AONB. Discussions with the AONB have highlighted that whilst there are other camping/glamping unit providers there is a lack of tent pitches within the AONB (with only a single site located within the area near Ingleton).

The proposal would provide a range of accommodation offerings that would allow different groups to enjoy the Forest of Bowland AONB and work towards meeting Objective 2.2 of the AONB Management Plan. Objective 2.2 seeks to develop, coordinate and promote sustainable tourism activity within and close to the AONB.

- 3. The site is within an isolated location beyond reasonable access by non-vehicular transport to the necessary facilities and services required for holidaymakers. The development constitutes an unsustainable location of development and fails Craven Local Plan 2012 to 2032 (November 2019) Policies SP2, EC3, EC4 & INF7 and National Planning Policy Framework Paragraphs 104 & 105.*

The location of the proposed development site is one of its strongest attributes with visitors expected to visit the site for the 'remoteness, isolation and tranquillity' that the AONB has to offer. The applicants will seek to provide essential groceries onsite – sourcing these from local producers.

The nature of the proposed accommodation is 'short stay', and it is considered that most visitors will bring most of their required produce with them. The type of accommodation does not typically lend itself to a settlement or edge of settlement location with most such development located as part of farm diversification schemes.

Paragraph 9 of the NPPF states that 'planning policies and 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**'.

Furthermore, Paragraph 85 of the NPPF confirms that 'planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or 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 (for example by improving the scope for access on foot, by cycling or by public transport)'.

The applicant intends to attract cyclists to the site, particularly given the proximity of the site to Gisburn Forest. It is also the intention of the applicants to secure direct pedestrian access from the site to Gisburn Forest to the east. On site, cycle storage is proposed and this can be increased to individual cycle storage boxes per glamping unit/pitch if necessary.

The applicant intends to provide an electric vehicle charging point within the farmyard to support such vehicles.

4. *The submitted FRA fails to meet the necessary criteria and does not accurately address flood risk at the site. The proposal, therefore, fails Craven Local Plan 2012 to 2032 (November 2019) Policy ENV6, National Planning Policy Framework Paragraphs 157 & 167 and Planning Practice Guidance Review individual flood risk assessments: standing advice for local planning authorities and Flood risk and coastal change.*

As the site area is less than 1Ha in area, there is no requirement for the application to be supported by a Flood Risk Assessment. It is noted that the Lead Local Flood Authority (LLFA) confirmed they had no objection to the proposed development.

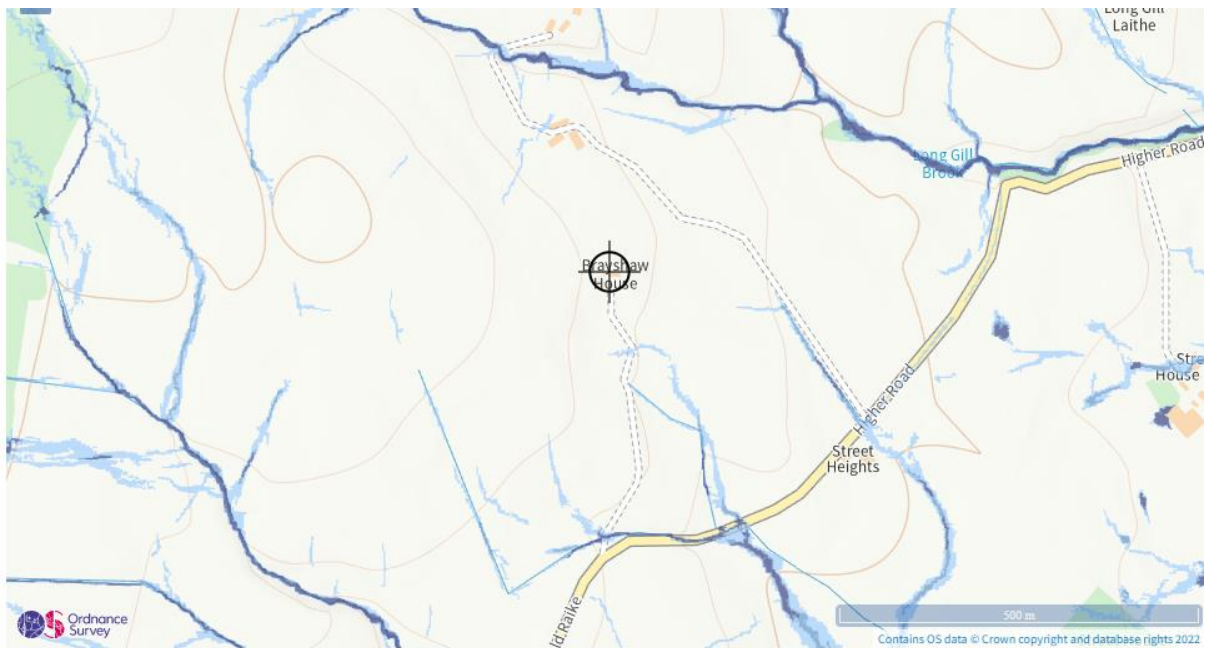
A review of the Craven Strategic Flood Risk Assessment (SFRA) confirms that the site is entirely located within Flood Zone 1. The extract of Map 35 of the SFRA 2017 detailed map confirms this position:



Figure 2: Extract of SFRA detail map 35 (Source: Craven District Council).

The Officer Report states that 'Surface water flood risk is present in the location of the bike storage, WC/shower facilities and motorhome parking bays, the proposed glamping units and onto the proposed pond, and the access to the site'.

A review of the Surface Water Flood Map is difficult to assess. It is noted that there is considered to be a low risk of surface water flooding in the proximity of the site. Based on the evidence before us it is extremely difficult to say for certain that the proposed units will be in an area at low risk of surface water flooding.



Extent of flooding from surface water

● High 
 ● Medium 
 ● Low 
   Very low 
 ⊕ Location you selected

Figure 3: Surface Water Flood Map (Source: The Environment Agency).

Low risk means that this area has a chance of flooding between 0.1% and 1% each year. Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding.

We have overlain the above Surface Water Flooding Map extract to an OS Extract to show the location of development with respect to potential Surface water flooding.



Figure 4: Surface Water Flood Map overlaid on OS Map.

The above clearly shows that the area at risk of surface water flooding at the site is minimal and restricted to the extreme south-eastern corner of the site, where the proposed pond is to be located (and is the reason for its chosen location). We do not consider that any of the proposed glamping units will be located in this area of minimal surface water flooding.

The site itself is an agricultural field that benefits from existing soakaways. Other than the erection of up to 6 glamping units, the scheme shall retain its permeability through the use of permeable materials and surfaces.

The proposal includes a pond that will act as an attenuation pond. It is proposed that all water on site will flow into this feature and provide mitigation. It is also considered that conditions can be attached to any potential planning approval that requires details of mitigation against potential surface water flooding to be provided prior to the erection of the proposed units.

- 5. The proposal has not followed the sequential approach to development contrary to Craven Local Plan 2012 to 2032 (November 2019) Policy ENV6, National Planning Policy Framework Paragraphs 157, 167 and 168.*



NPPF Paragraph 167 clarifies that FRAs (and the sequential and exception tests, as applicable) should demonstrate: (a) the most vulnerable development is located in the lowest area of flood risk; (b) development is appropriately flood resistant and resilient; (c) sustainable drainage systems are incorporated; (d) residual risk is safely managed, and (e) safe access and escape routes are included.

NPPF Paragraph 168 states some minor development and changes of use should not be subject to the sequential or exception tests (but still require an FRA). Footnote 56 clarifies that changes of use to a caravan, camping or chalet site are not exempt and the sequential and exception tests should be applied as appropriate.

Whilst the proposed development seeks permission for a small-scale camping/glamping site, it is shown above that the area proposed for development is not located within an area at risk of surface water flooding and as such there is not considered to be any need for a sequential assessment in this instance.

6. *The proposal does not amount to either sustainable economic development in the countryside or sustainable tourism. The principle of development is therefore unacceptable and fails Craven Local Plan 2012 to 2032 (November 2019) Policies EC1 and EC3 and National Planning Policy Framework Paragraph 85.*

It is noted that locational matters have been addressed above, whilst responding to reason for refusal 3. It is considered that visitors specifically want to experience and enjoy the 'remoteness, isolation and tranquillity' that the site and surrounding AONB has to offer. As noted, in a recent site meeting the AONB officers welcome the proposal and consider the scheme to be acceptable to the location within the AONB.

The number of vehicle movements is anticipated to be small and NYCC Highways has not objected to the scale of the previous application with respect to access to the site. In a nutshell, access to the site for both vehicles and pedestrians is considered safe.

The applicant intends to provide an electric vehicle charging point within the existing farmyard and onsite cycle storage is proposed to meet the need of the numerous cyclists that visit the area, in particular, to gain access nearby Gisburn Forest. It is also the intention of the applicants to provide essential groceries onsite – sourcing these from local producers – reducing the need for visitors to travel daily.

We consider that the above information addresses the reasons of refusal to the previous scheme as assessed by Craven District Council. We would encourage the appointed Planning Officer to undertake an accompanied site visit to view the proposed development site in person, as has recently been done by Mr Lorimer. We welcome the opportunity to discuss the issues above in more detail as part of this revised planning submission.

We would, therefore, be grateful to have your comments in respect of the proposed development and we look forward to discussing the proposal with you soon. However, if in the meantime you have any further questions or would like to discuss any of the above, please do not hesitate to contact me.

Yours sincerely,

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