

# Planning Statement

In support of

Full planning application for the siting of two caravan act compliant log cabins to provide tourist accommodation in support of farm diversification

At

Edge of woodland,  
North of Empshill Farm  
Farmington  
CHELTENHAM  
GL54 3ND  
E: 414095, N:214952

Applicant

Mr and Mrs B Tew

Agent

The Rural Planning Co

Providing planning solutions for  
agriculture | equestrian | rural business | residential



Application summary	
Description	Full planning application for the siting of two caravan act compliant log cabins to provide tourist accommodation in support of farm diversification
Site address	Edge of Woodland, North of Empshill Farm Farmington CHELTENHAM GL54 3ND E: 414095, N:214952
Applicant	Mr & Mrs B Tew, c/o The Rural Planning Co
Local Planning Authority	Cotswold District LPA
Planning portal reference	PP-
Job reference number	J008565
Agent details	The Rural Planning Co, The Farm Office, Millridge Farm, Parsons Lane, Hartlebury, Nr Kidderminster, Worcestershire, DY11 7YQ.  Telephone: 01299 667344 Email: team@theruralplanningco.co.uk
Documents submitted	Planning Statement  Block Plan  Location plan  Cabin Floor Plans and Elevations  Ecological Survey

	Arboriculture Survey
	Arboricultural Impact Assessment
	Landscape Visual Assessment
	Biodiversity Self-Assessment Form
	CIL Additional Form
	Foul Drainage Assessment Form
	Computer Generated Images (CGI's)

CONTENTS PAGE

1.0	Introduction.....	3
2.0	Background.....	3
3.0	Site description and overview.....	4
4.0	Planning Policy.....	6
5.0	Designations.....	9
6.0	Public rights of way.....	9
7.0	Planning history.....	10
8.0	Flood Risk.....	10
9.0	Context.....	12
10.0	Farming and Diversification.....	13
11.0	National need.....	14
12.0	Local need.....	15
13.0	The Caravan Act.....	15
14.0	Proposed Log Cabins.....	17
15.0	Design.....	19
16.0	Siting.....	20
17.0	Scale.....	20
18.0	Access and Car Parking.....	21

19.0	Transport Options .....	22
20.0	Waste Management .....	22
21.0	Water Management .....	22
22.0	Environment and Landscaping .....	23
23.0	Biodiversity .....	24
24.0	Trees .....	25
25.0	Renewable Energy .....	27
26.0	Heritage Statement .....	28
27.0	Benefits of the Proposal .....	31
28.0	Planning principle and material considerations .....	36
29.0	Conclusion.....	41
	Appendix 1 – Photos of BLC’s transportation / delivery.....	42

## 1.0 Introduction

- 1.1 The Rural Planning Company is instructed by Mr & Mrs B Tew to apply for planning permission at Empshill Farm, Farmington, nr Cheltenham for a full planning application for two log cabins to be sited on the edge of an existing woodland on the agricultural holding.
- 1.2 The application is submitted to Cotswold District Council via the Planning Portal reference: PP-xxx.
- 1.3 This statement considers the application site, its context and relevant planning history in relation to the proposals. The scheme is considered against relevant local and national level planning policy.
- 1.4 The statement then goes on to fully justify the development in planning terms and highlights the key benefits of the proposal which will provide accommodation units to encourage tourism into the area and allow the long-term effective management of an area of woodland currently suffering from Ash dieback disease.
- 1.5 The tourism industry is changing as people opt for more environmentally responsible options and the impact of Covid. This means that a growing amount of leisure time is being taken in the UK. There is an increasing demand for high quality places to stay.
- 1.6 The proposal is for two individually designed log cabins, designed and built to be legally defined as a caravan. The site is well screened from the public vantage by virtue of its location and extent of existing mature hedges and trees surrounding it. The key driving policies for this type of project in the Local Plan are policies EC5 and EC11 which set out certain criteria with the Cotswolds' National Landscape Management Plan also considered to be a key document for this type of development. The statement will demonstrate that the proposal meets the criteria and as such is supported by local planning policy.

## 2.0 Background

- 2.1 This application is a resubmission of a previously withdrawn application (23/02455/FUL). The previous application was withdrawn in order to provide more evidence to assist the LPA in assessing the proposal in terms of principle, the impact on the existing woodland and the wider landscape.
- 2.2 Negotiations with the planning officer during the previous application have been helpful in allowing the applicants to clarify the use of the site in relation to the principle. It was the intention that the previous application be determined as a change of use of land to site caravan act compliant cabins that are not designed or built to be considered 'operational development'. The validation team requested a higher planning fee which tipped the application into the realms of 'permanent development' which meant that it would have been wrongly assessed, hence why it was withdrawn.

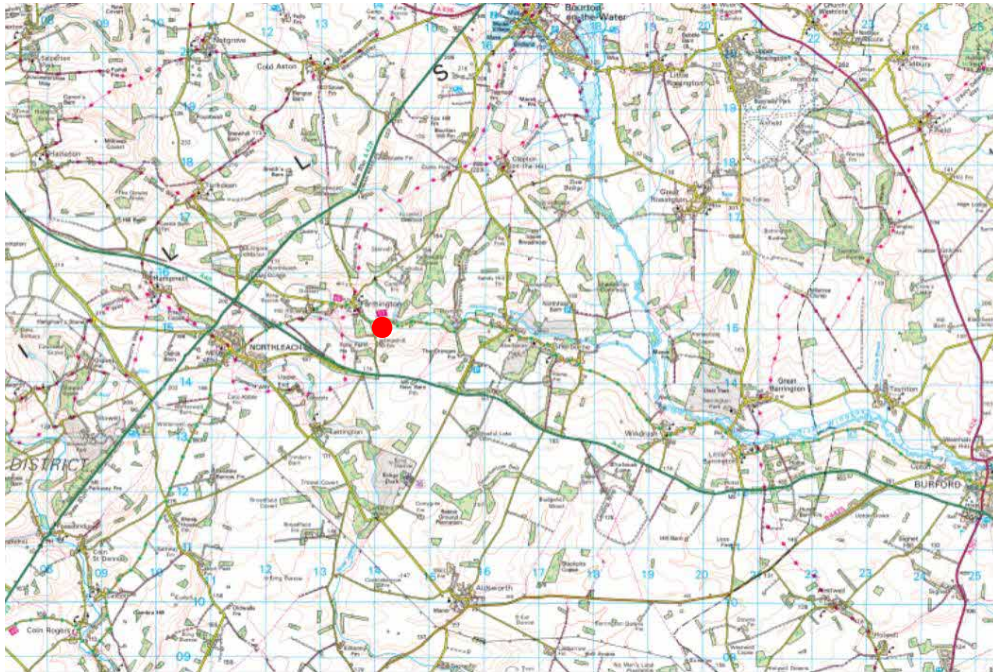
The previous planning officer confirmed that 'in principle, if the scheme were resubmitted as a change of use and the siting of caravans, this could be supported', going on to add 'where it is demonstrated that they (the cabins) meet the legal definition of a caravan, in principle, and subject to all other considerations, the principle of development is likely to be acceptable'. The evidence set out within the report clarifies this fundamental issue to enable the proposal to be supported, in principle.

- 2.3 In discussions on the withdrawn planning application the LPA noted that further evidence in the form of an Arboricultural Impact Assessment (AIA) would be helpful to allow the councils Tree Officer to fully assess the proposal in terms of the impact of any tree removal and proposed site protection measures. An AIA has now been undertaken by an independent Arboriculturist and is submitted alongside the Tree Survey to support the application and is discussed within this statement.
- 2.4 In addition, the LPA were also keen to be provided with further evidence to inform any impact on the tranquility and character of the AONB given the site's sensitive location. An independent Landscape Visual Assessment has therefore been undertaken by a qualified Landscape Consultant which has fully informed some key landscape opportunities to enhance the immediate and wider landscape of the site and is discussed further within this statement.

### 3.0 Site description and overview

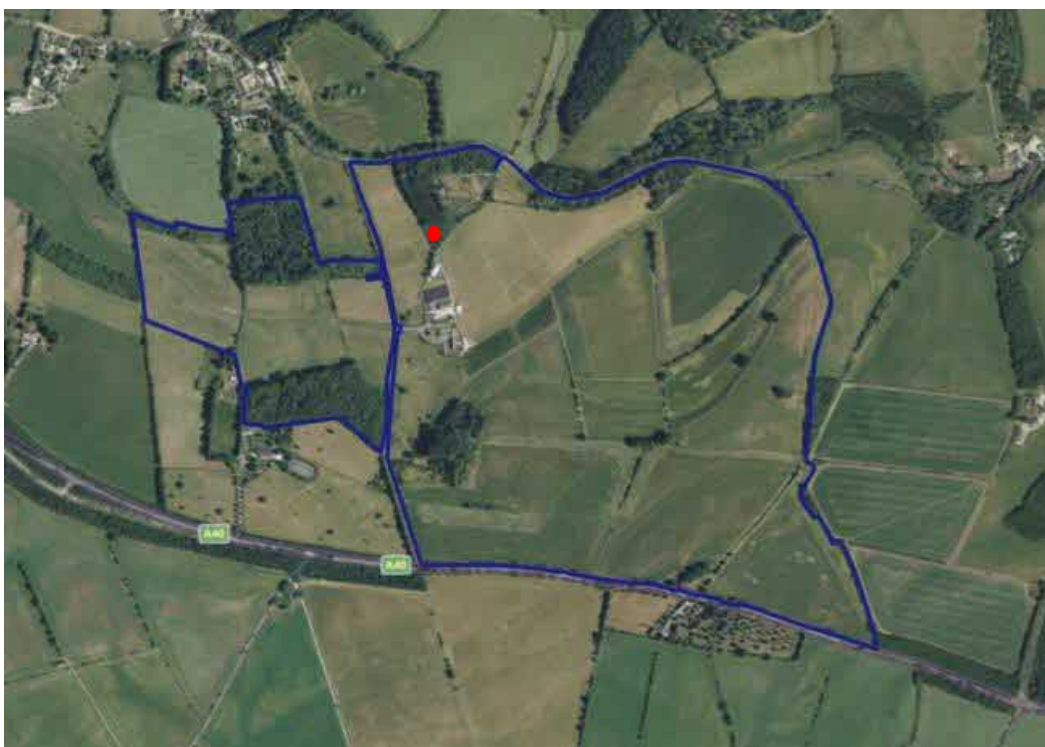
- 3.1 The site sits in the heart of the Cotswolds with Farmington village lying approximately 550m north of the site. Nearby villages are Northleach (0.7m) to the southwest, Sherborne (1.5m) to the east, and the larger settlements of Bourton-on-the-Water (6.5m), Burford (8m), Cheltenham (14m), Cirencester (12m) and Oxford (26m) a short drive away.
- 3.2 The area is a mosaic of mixed farmland and woodland interspersed with settlements with field boundaries generally consisting of mature trees and hedgerows.
- 3.3 The site location in context is shown below.

Figure 1: The approximate location of the site denoted by red circle (Source Bing Maps)



- 3.4 Empshill Farm, to which this proposal relates, comprises 309 acres of working farmland with 5 separate parcels of woodland. It is accessed either from the village of Farmington or directly off the A40 and comprises the main farmhouse and ancillary dwellings with a mix of traditional and modern farm buildings, stabling, ménage and agricultural land.
- 3.5 The extent of the land holding is shown below (in blue).

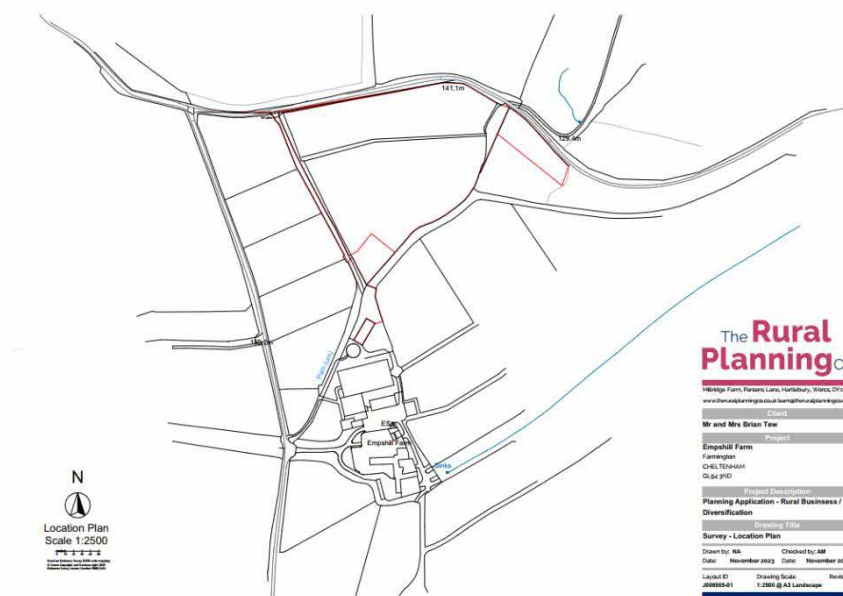
Figure 2: The extent of the agricultural land holding (source: Land App)





- 3.6 The applicant's proposal is to site two individually designed log cabins to provide accommodation for tourists for short breaks, on the edge of the woodland that lies to the north of the main farm complex. The site is located at the southern edge of the plantation named Square Copse.
- 3.7 The positioning of the log cabins in relation to the wider site is shown below (site area in red).

Figure 3: Site Plan (source: TRPCo)



- 3.8 The applicants have carefully chosen the siting of the cabins to ensure that they will be read alongside the existing woodland and that the site is completely screened by topography and existing mature trees and hedges. The location is also in close enough proximity to the main farmhouse to ensure that effective management of the use can be undertaken.
- 3.9 The proposed enterprise will be run on a day-to-day basis by the applicants to provide them with a revenue stream to support their farming business. It is expected that the cabins will be desirable to cyclists, walkers and nature lovers, with the latter being able to take advantage of the attractive surrounding landscape.
- 3.10 As the cabins are designed to a high quality, modern standard of construction and insulation, it will be possible to let them out throughout the year which means they can continue to generate year-round employment to contribute towards the rural economy and the diversification of the farming enterprise. The setting of the site in the heart of the Cotswold's and within the designated Area of Outstanding Natural Beauty makes all year letting particularly attractive.

## 4.0 Planning Policy

## National Planning Policy Framework (NPPF)

- 4.1 The NPPF was revised in July 2021 and sets out the Government's planning policies for England and how these should be applied by Local Planning Authorities (LPAs). Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.
- 4.2 At the core of the NPPF is the ability to deliver, and the presumption in favour of, sustainable development. Paragraph 8 confirms this setting out that:
- '...achieving sustainable development means that the planning system has three overarching objectives which are independent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)':
- 'a. an economic objective – to help build a strong, responsive and competitive economy...to support growth and innovation'
- 'b. a social objective - to support strong, vibrant and healthy communities...and support communities' health, social and cultural well-being'
- 'c. an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently.'
- 4.3 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.'
- 4.4 Paragraph 38 of the NPPF states that:
- 'Local planning authorities should approach decisions on proposed development in positive and creative ways...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.'
- 4.5 Paragraph 84 of the NPPF 'Supporting a prosperous rural economy' sets out that planning policies and decisions should enable:
- a) 'the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

- b) the development and diversification of agricultural and other land-based rural businesses;
  - c) sustainable rural tourism and leisure developments which respect the character of the countryside’.
- 4.6 Paragraph 202 is concerned with development that may impact on a designated heritage asset and that where a proposal leads to less than substantial harm, this should be weighed against the public benefits of the proposal.

#### Planning Practice Guidance (PPG)

- 4.7 The National Planning Practice Guidance adds further context to the National Planning Policy Framework (NPPF) and it is intended that the two documents should be read together. It is regularly updated and assists decision makers in understating key areas of planning. The guidance is a ‘material consideration’ when taking decisions on planning applications.

#### Local Plan

- 4.8 The Cotswold District Local Plan, 2011-2031 (Adopted 3 August 2018) sets out the broad long-term vision, objectives and strategic planning policies for the district up to 2031. It includes a number of policies which will be used to assess the proposal. Those considered material to the proposal are set out below:

Policy EC1 EMPLOYMENT DEVELOPMENT

Policy EC5 RURAL DIVERSIFICATION

Policy EC11 TOURIST ACCOMMODATION

Policy EN1 BUILT, NATURAL AND HISTORIC ENVIRONMENT

Policy EN2 DESIGN OF THE BUILT AND NATURAL ENVIRONMENT

Policy EN4 THE WIDER NATURAL AND HISTORIC LANDSCAPE

Policy EN5 COTSWOLDS AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

Policy EN7 TREES, HEDGEROWS AND WOODLANDS

Policy EN8 BIODIVERSITY AND GEODIVERSITY: FEATURES, HABITATS AND SPECIES

Policy EN10 HISTORIC ENVIRONMENT: DESIGNATED HERITAGE ASSETS

Policy EN14 MANAGING FLOOD RISK & Policy INF8 WATER MANAGEMENT  
INFRASTRUCTURE

Policy INF3 SUSTAINABLE TRANSPORT

Policy INF4 HIGHWAY SAFETY

Policy INF5 PARKING PROVISION

Policy INF10 RENEWABLE AND LOW CARBON ENERGY DEVELOPMENT

- 4.9 One of the strategic objectives of the Local Plan 3C) is to ‘Support sustainable tourism in ways that enables the district to act as a tourist destination which attracts higher

numbers of longer-stay visitors’.

- 4.10 Another strategic objective 6A) is to address climate change by ‘Maximising water and energy efficiency, promoting the use of renewable energy sources and sustainable construction methods, and reducing pollution and waste’.

Other Policy Considerations

- 4.11 The Cotswold’s National Landscape Management Plan is a statutory plan which should be read alongside the local development plan and sets out the vision, outcomes and policies for the management of the Cotswold’s National Landscape for the period 2023-2025. Relevant policies include:

POLICY CC1 & CC2: CLIMATE CHANGE

POLICY CC5: WATER

POLICY CE1: LANDSCAPE

POLICY CE5: DARK SKIES

POLICY CE7: BIODIVERSITY AND NATURE RECOVERY

POLICY UE3: SUSTAINABLE TOURISM

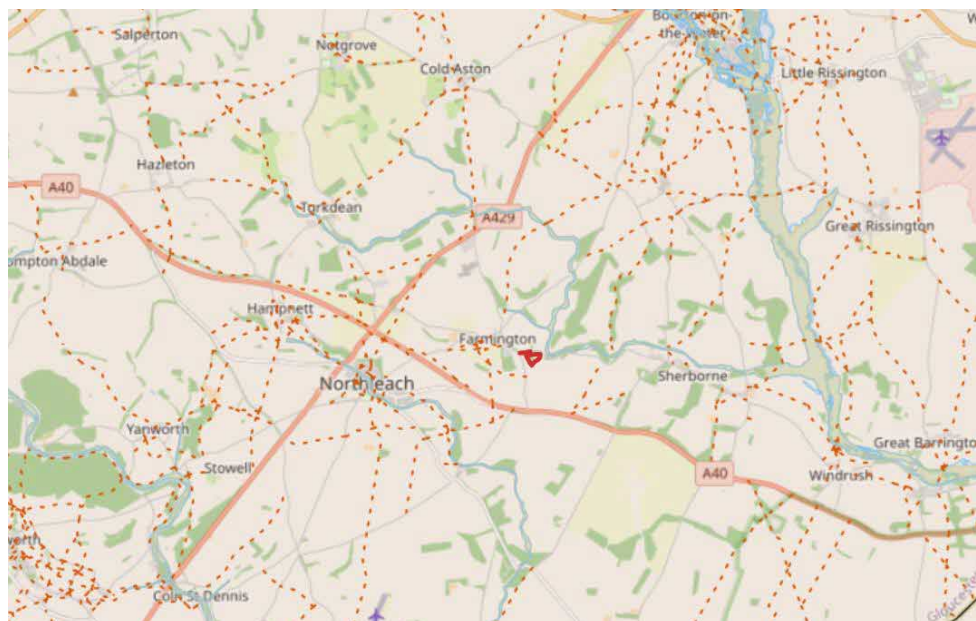
## 5.0 Designations

- 5.1 The predominant land use for the wider land parcel where the cabins are proposed to be sited is existing low-quality woodland and the proposed site for the cabins is fairly open and sparsely covered by young self-seeded ash which is largely affected by ash dieback and environmentally stressed spruce as stated in the independently commissioned Tree Survey that accompanies this planning application. The site location lies outside the designated Green Belt and is not located within a Conservation Area, Site of Special Scientific Interest (SSSI), National Park or Special Wildlife Site (SWS).
- 5.2 The site and wider area lie within the Cotswolds’ Area of Outstanding Natural Beauty (AONB) which was designated for its rich, diverse and high-quality landscape.
- 5.3 The farmhouse and associated barns on the holding are grade II listed and there are 3 Scheduled Ancient Monuments in the wider vicinity of the site which are a considerable distance away negating any detrimental impacts in this regard.

## 6.0 Public rights of way

- 6.1 There are no public rights of way conflicting with the site, however they are accessible in the local area providing accessible routes to nearby settlements and within the open countryside.
- 6.2 The plan below shows public rights of way in the wider area (orange hatching).

Figure 4: Public footpath connections (source Land App)



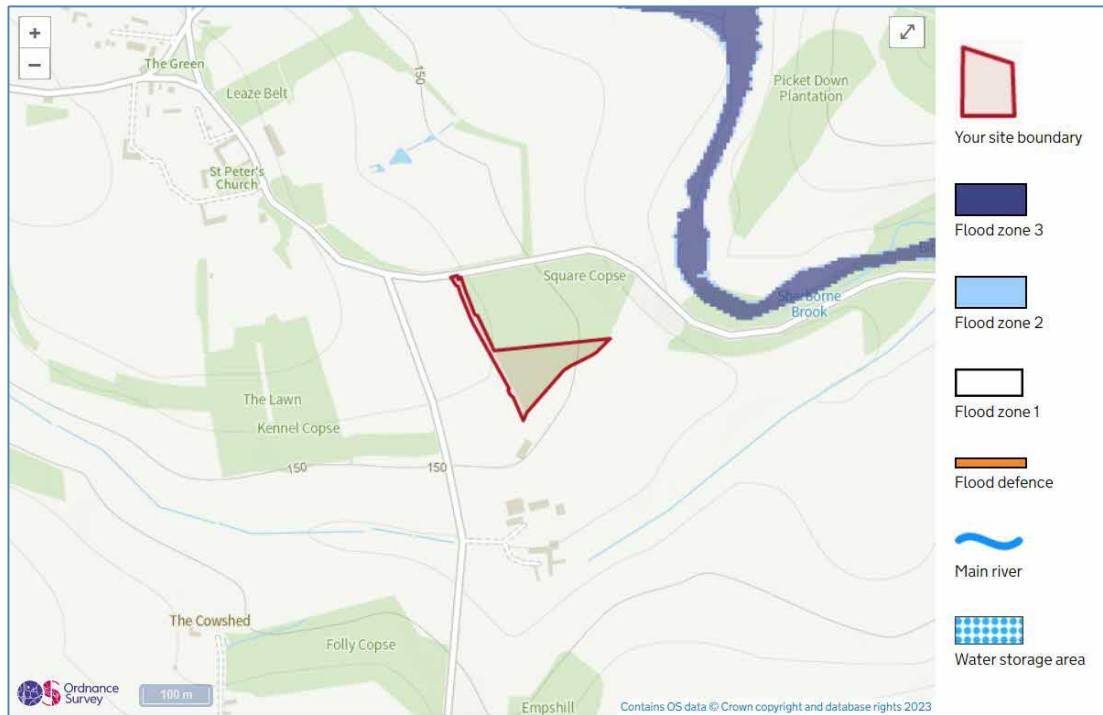
## 7.0 Planning history

- 7.1 The site area itself does not have any planning history but there have been planning applications submitted over the years relating to the main farmhouse, adjacent buildings, associated barns, stabling and ménage – none of which are relevant to this planning proposal.

## 8.0 Flood Risk

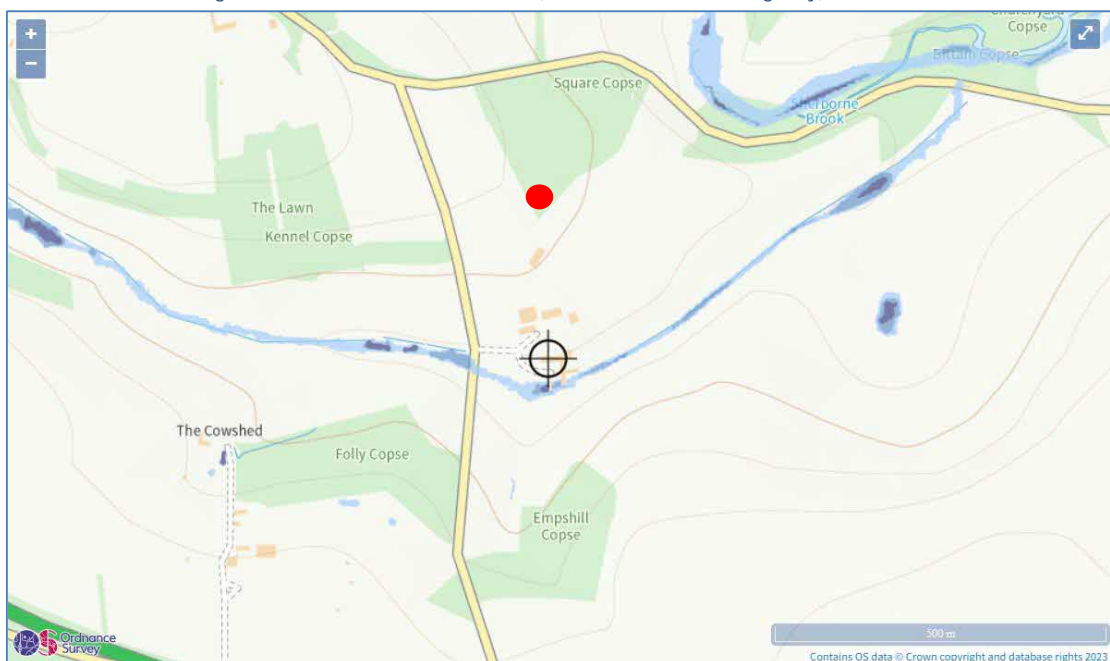
- 8.1 The parcel of land is located in Flood Risk Zone 1 which is classed as low probability of flooding as demonstrated on the map below from the Environment Agency 'Flood Maps for planning'.

Figure 5: Flood Maps for Planning (source: Environment Agency)



8.2 The parcel of land is also at very low risk of surface water flooding in accordance with the Environment Agencies Surface Water Flood Risk mapping.

Figure 6: Surface Water Flood Risk (source: Environment Agency)



## 9.0 Context

- 9.1 The applicant and the wider farming family live and farm their land locally, and it is the intention to deliver the proposal as part of the farm diversification plan going forward. The family live on site and are well placed to manage the proposal from this location.
- 9.2 The holding comprises 309 acres of farmland including 5 woodlands and provides a beautiful setting for a low-key Cotswold break providing a glimpse into farming life. The applicants are keen to promote the site as an opportunity for those with an interest in wildlife photography to enjoy the wildlife that the farm enjoys.
- 9.3 As the farm adapts to changing practices/policies it needs to diversify to secure its productivity and income for the next generation. The proposed diversification will enable this farmland to work in harmony on a low-intensity basis to support the families that live and work on the farm, and the new generations coming through.
- 9.4 The applicants have chosen to diversify in this way as they are aware of the need for much more environmentally friendly ways of living, which would include decreasing our carbon footprint in respect of the way in which we travel and take holidays. The Covid-19 pandemic made everyone aware of the need to take good care of our overall health, and that a connection with the natural world is extremely beneficial to our wellbeing.
- 9.5 The southern extent of the woodland itself is of poor quality due to ash die-back which has weakened the trees resulting in substantial losses in recent years. The applicants are undertaking extensive work on all the woodland areas within their holding in removing poor quality trees and replacing them with native species, partly with the help of a woodland grant. This particular woodland has unfortunately been subject to significant Ash die-back with Spruce of poor quality (as noted in the Tree Report) which means a number of the trees have either been lost or are dying and the applicants wish to manage the woodland in a sustainable manner by removing dying or poorer species and replanting an extensive area of new woodland adjacent to the site with native species. The proposal would assist in the management of the woodland as it would facilitate the removal of a small number of poorer and younger trees that can be replaced adjacent to the site in accordance with the plans. This will provide an overall improvement for biodiversity and the local landscape.
- 9.6 The siting of the cabins has been carefully chosen to respect the findings of an independently commissioned Tree Survey within the southern edge of the woodland where the tree cover is sparser, species are diseased or environmentally stressed and recommended for felling and replacement and access to services the most efficient. The siting also allows visitors to take advantage of the incredible views from the site to the farmland beyond. The wider woodland comprises an area of coniferous plantation, with a ground layer of tall ruderal vegetation and scattered scrub. To the north is a small section of semi-natural mixed woodland, whilst to the east a new area of young broadleaved woodland has been created by the applicants. The southern boundary of

the woodland comprises a species poor hedgerow and the proposal provides an opportunity to enhance this with more appropriate native species. Along the western boundary of the site is an access track of hardstanding with horse paddocks beyond and the proposal also provides an opportunity to plant a new species rich hedgerow along the opposite side of the access track.

- 9.7 The photos below show the woodland where it is proposed to site the cabins and the species poor hedgerow at the front of the site.

Figure 7: Photos of Woodland / Hedgerow



## 10.0 Farming and Diversification

- 10.1 Farming is vital for the British economy and food security. As a sector it is worth over £120 billion and employs over 4 million people with over 149,000 businesses. Because of this farming offers huge potential to the rural economy as a whole.
- 10.2 However, the enterprise is exposed to a large amount of risk that gives it an uncertain future. It is an extraordinarily difficult and volatile industry which is impacted by



political and economic factors. Following Brexit, the Government has declared that farm businesses will be losing their subsidy / direct farm payments imminently which will not be directly replaced, placing even further strain and pressure on farming.

- 10.3 Added to this, changes to the immigration system and the end of the free movement of EU workers have resulted in labour shortages and there is much higher competition as farmers now face an influx of poor-quality food imports to compete with, such as that from the United States and Australia.
- 10.4 The industry is also dependent on the weather which is impacted by the effects of climate change. If it's too dry, crops won't grow. If the season is too wet, crops can rot and suffer from mould or simply drown in the standing water. A late or early frost can leave an entire field worthless. This all impacts on the farmer's profitability, which can be felt for many years after a particularly bad harvest.
- 10.5 Given this, 68% of all farm businesses in England also run other enterprises through diversification (<https://www.gov.uk/government/statistics/farm-accounts-in-england/preface#content>) such as farm shops, commercial ventures and tourist accommodation - generating an income of £740 million in 2018/19, to the UK economy (Department of Rural Affairs, Farm Accounts in England Results from the Farm Business Survey 2019/20).
- 10.6 Seeking alternative forms of income is absolutely essential for the survival of family farms.
- 10.7 The NPPF and Local Plan are supportive of farm diversification schemes in principle through paragraph 84 and policy EC5 respectively.
- 11.0 National need
- 11.1 The Government's Tourism Action Plan 2016 outlines the 'vitally important' need of tourism in the UK to our national economy and sets out the key areas for development and promotion. In particular the plan seeks to ensure that the benefits of tourism are shared across the whole of the country and not just in and around London; with increasing emphasis on the countryside and rural areas.
- 11.2 According to Visit Britain's surveys and research, in 2019 the UK attracted 36.1 million international visitors, who added £24.8 billion to the economy, making tourism one of the country's most important industries and the third largest service export. Current forecasts predict the sector will deliver a 23% increase in inbound visitors by 2025. Domestic tourism is also set to increase by an estimated 3% per annum until 2025. In 2019, British residents took 99 million overnight trips in the UK, spending £19.5 billion. Over £100 billion was spent on tourism in England in 2019.
- 11.3 Further research by Visit England identifies a continuing increasing trend in domestic tourism on the back of the economic downturn and predicts that the 'staycation' (holidays in the UK rather than abroad) is likely to remain popular in the near future,

particularly with regards to short breaks.

## 12.0 Local need

- 12.1 The Cotswolds are strategically located in the heart of the country in an area that has been designated as an Area of Outstanding Natural Beauty and lies mainly within Gloucestershire and Oxfordshire.
- 12.2 The tourism and visitor economy is concentrated in rural areas of Gloucestershire and is vital to the Cotswold economy where tourists spend over £326m annually and where it employs over 14% of the workforce. Tourism also has a direct link to agrifood, with 32% of tourists spending in Gloucestershire being devoted to food and drink, some £340m annually.
- 12.3 The Local Plan explains that the service sector accounts for the largest proportion of local jobs, with tourism being a major and growing part of the local economy.
- 12.4 In accordance with the 'Gloucestershire agrifood and rural economy final report 2019' the rural economy has substantial potential for growth through, inter alia, growing high value tourism by promoting Gloucestershire's year-round attractiveness through its landscape, food offer and heritage as short breaks and longer stays grow.
- 12.5 Studies of the Gloucestershire tourism sector shows 20,349,000 day and staying visitors in 2017. This supports business turnover of £1.55 billion a year and 19,705 FTE jobs.
- 12.6 The 'Gloucestershire agrifood and rural economy final report 2019' also demonstrates that the estimated value of farm diversification in Gloucestershire is 50% larger than the national average would suggest, or an estimated £41.5m of additional turnover and £22.2m of GVA in 2017.
- 12.7 This proposal would be adding to the local tourism sector and rural economy in a positive way.

## 13.0 The Caravan Act

- 13.1 Glamping is a portmanteau of "glamorous" and "camping" and describes a style of camping that includes facilities and accommodation considered far more comfortable than traditional camping.
- 13.2 The cabins in this proposal fall within the legal definition of 'caravan' for the purposes of planning legislation and represent a use of the land rather than operational development. The legal definition of a caravan covers a wider range of structures than conventional touring caravans. A 'caravan' is any structure designed for human habitation that is capable of being transported. The term 'caravan' applies to touring caravans, motorhomes, cabins, static caravans, twin-unit mobile homes and park homes. Section 13 of the 1968 Caravan Sites Act (as amended) provides that a structure designed or adapted for human habitation, which is composed of not more than two

sections separately constructed, and designed to be assembled on site by means of bolts, clamps or other devices, and which is, when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer), is not to be treated as not being a caravan within the meaning of Part 1 of the 1960 Act by reason only that it cannot be moved on a highway when assembled. In other words, a twin-unit caravan or mobile home is to be treated as a caravan if it meets these criteria and satisfies the rules set out below.

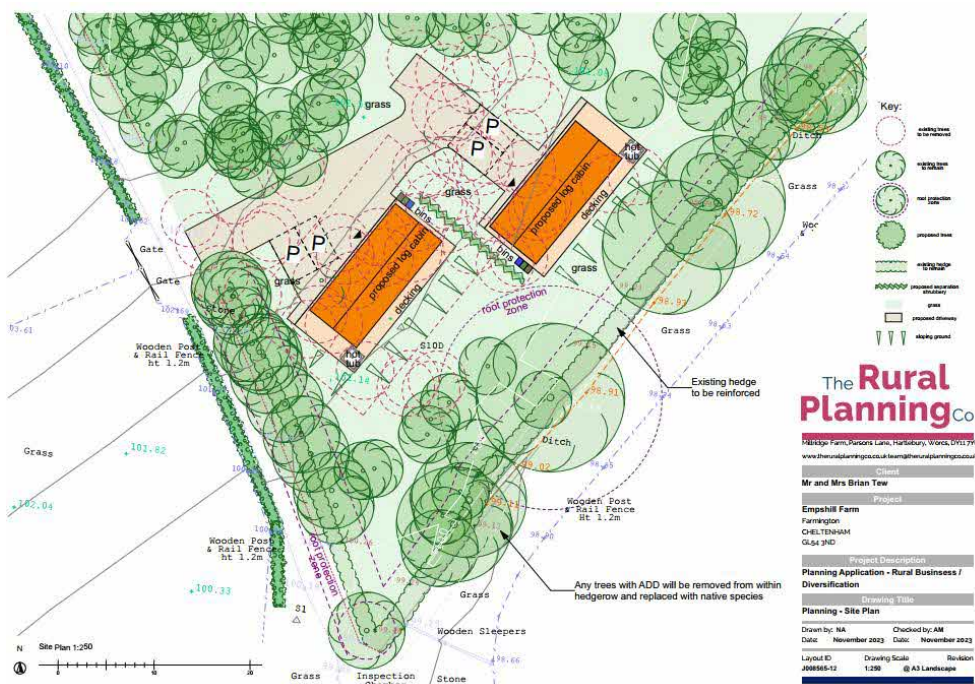
- 13.3 The meaning of the word "caravan" was dealt with in the House of Lords case Wyre Forest DC v SoS and Allen's Caravans 1990 where it was stated that any uncertainty should be resolved by adhering to the statutory definitions which prima facie represent the meaning of the words defined. The House of Lords held that the word "caravan" was to be given its meaning in the Caravan Sites and Control of Development Act 1960, as including a chalet, and not its ordinary meaning which would have excluded it.
- 13.4 There are 3 tests to be applied to caravans: a construction test, a mobility test and a size test. The construction test requires that the act of joining two sections of the caravan together should be the final act of assembly. There is no requirement that the process of creating the two separate sections take place away from the site.
- 13.5 Mobility assesses how the caravan could be moved. All caravans must be 'capable' of being moved once assembled. It is not necessary for a caravan to be towed, only that it is capable of being moved by road. It is the structure that must possess the necessary qualities, not the means of access to any particular road.
- 13.6 In considering size, the Act, as amended in 2006, defines the size of caravans as not having a greater length than 65.616 feet (20 metres); width: 22.309 feet (6.8 metres) and overall height of living accommodation 10 feet (3.05 metres).
- 13.7 In considering construction within the Act, the mobile home should be "composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices". There is no requirement however that the process of creating two separate sections must take place away from the site on which they are then joined together, only that "the act of joining the two sections together should be the final act of assembly". The decking around the cabins proposed is entirely self-supporting and is not connected to the cabins in any way.
- 13.8 In this instance, the cabins have been bespoke designed and hand assembled in a workshop rather than in situ and will be transported to the site and will be capable of being moved from the site in future. The cabins will be limited to the dimensions set out above. Thus, they will satisfy the 'mobility test', the 'size test' and the 'construction test'.
- 13.9 In addition, the fact that the mobile cabins meet the legal definition of a caravan is set out clearly on the British Log Cabin website: <https://www.britishlogcabins.com/mobile-log-cabins> where they are considered to be of 'true plug and play' design.

- 13.10 This proposal is therefore for the 'siting' of caravan Act compliant cabins and not operational development that would constitute a building. The fact that it will be connected to some services should not have a bearing in the consideration of their permanence. This was clearly established at *St Albans City Council v Mr and Mrs Wernham (2015)* where the Inspector concluded that "the mobile home would then be connected to mains water, electricity and drainage. But that would not be a physical attachment of the mobile home to the ground. Nor would the connection to services affect its mobility, in that such connections could be quickly detached and the mobile home craned off site with a minimum of work. That work would not amount to building operations, (s.55(1) of the Act)".
- 13.11 British Log Cabins have designed and transported a number of similar cabins across the UK and Appendix 1 contains photos that demonstrates how this is achieved – further establishing that the proposed cabins are capable of being transported.

## 14.0 Proposed Log Cabins

- 14.1 The applicants propose to provide short-term holiday accommodation within two units, that will be accessed from the existing rear entrance to the north of the farm.
- 14.2 The approach to the development is intended to be low-key: visitors will be able to access the site from the quieter northern farm access and park adjacent to the cabins. A very modest section of the woodland will be surfaced for the purposes of access and parking. The materials to be used for the access track will be crushed local stone to harmonise with the rural locality and to allow rainwater to permeate into the ground as it would naturally. Materials proposed for the parking area for each cabin will be grasscrete to reduce any impacts on the landscape and to offer a permeable, sustainable and eco-friendly solution. To further mitigate any impact it is proposed to plant a new native hedgerow along the opposite side of the access track. This will minimize any light pollution in terms of car headlights in the evenings.
- 14.3 The proposed siting of the cabins is shown below:

Figure 8: Block Plan (Source: TRPCo)



- 14.4 It is intended to promote the units as a unique and luxury glamping experience that will include facilities and accommodation far more comfortable than traditional camping. Unlike traditional camping, glamping is an all-weather option so people can visit all year round and the local economy can continue to benefit, not just in high season. The retreat will comprise of cabins that will benefit from providing everything people need under one roof whilst being able to fully enjoy the countryside and farming life and take opportunities to explore the local area.
- 14.5 The location of the retreat will give the sense that visitors are away from the hustle and bustle but will in fact be close to Cheltenham, Gloucester, Cirencester and Oxford providing the perfect location to explore the attractions and facilities close by or simply to enjoy the breathtaking scenery of the AONB. The site is located within walking distance of Farmington and Sherborne, within cycling distance of many other larger settlements, but is also well placed for national visitors, being located between the M40 and M5 motorways.
- 14.6 The applicants have identified a gap in the market for luxury camping accommodation for those visiting the Cotswold area – there is currently very little in the area to accommodate tourism in this way. Limited availability of this type of accommodation can exclude those on lower incomes from staying in the area, reducing the diversity of visitors. The AONB Management Plan stresses that provision of such accommodation should be compatible with the purpose of conserving and enhancing natural beauty which this proposal aims to do.
- 14.7 The vision for the site is to integrate it with the working farm. The emphasis will be on

the connection with the farm through the 'story' the applicants tell on their accommodation website and within literature. Visitors will be able to enjoy observing the livestock that will be grazed nearby and enjoy experiencing local farm life in operation - they will truly feel integrated with farm and country living.

- 14.8 The applicants are in the process of making connections with local businesses that are at the start-up or young stage selling local produce to utilise in their welcome hamper to assist them to grow – these businesses will in turn be able to cross refer potential clients to the cabin accommodation to establish successful local networking and allow small businesses to grow and prosper to strengthen the local economy.

## 15.0 Design

- 15.1 The applicants have sourced bespoke, eco-friendly, sustainably sourced, individually designed cabins that will blend into the woodland and provide aesthetically low key, yet luxury affordable accommodation.
- 15.2 The cabins provide a discreet low-key design, providing comfort with a high-quality finish designed with sturdy insulation to extend the season and allow guests to stay during the winter months. They will be fully furnished, self-contained and wholly equipped for cooking, showering and sleeping. Aesthetically the cabins are designed to blend organically into the landscape offering natural wooden materials with sustainable Douglas Fir used for the log work and cladding finished in a clear Osmo Stain. The roofing is proposed as plastisol steel sheets which will give the cabins a pastoral character.
- 15.3 Each cabin will comprise 2 bedrooms with an open plan kitchen, dining and living area. They are designed to be fully self-contained for sleeping, eating and cooking.
- 15.4 Full floor plans, sections and elevations of the cabins are submitted alongside this planning application and example photos are provided below of a similar local cabin that is nearing completion:

Figure 9: Example photos of similar cabins (Source: BLC)





- 15.5 Key principles of the design are that the cabins are modern, energy efficient, and eco-friendly with a luxurious feel but aesthetically low-key and harmonious with woodland and farming surrounds.

## 16.0 Siting

- 16.1 The siting of the cabins has been chosen within the 309 acre holding as the most discreet and advantageous location given proximity to services, the position of the existing access track and on ground with low susceptibility to flooding or surface water risk and sited so as not to compromise any existing agricultural activity and to enable the effective species management of a diseased woodland. There is an existing water mains that runs adjacent to the woodland offering easy connection. The location of the site chosen best allows for minimal ground works on site.
- 16.2 During their stay guests will be offered the following services: Luxury welcome packs using local products; weekly delivery service from local artisans and suppliers for basic supplies; picnic hampers & barbeque packages using locally sourced produce; a pick up and drop off service for walkers; bicycle hire; and pick up and collection from nearby train stations. The applicants are currently sourcing a local electric bike company as this would be the preferred bike hire offer continuing the sustainability theme.

## 17.0 Scale

- 17.1 This proposal is for a very small-scale retreat to provide for two individual cabins, that will sit well within the topography of the site, assimilating into the existing woodland without requiring any extensive excavations. The cabins have been designed to integrate sensitively into the wider landscape. And are of a scale commensurate with the necessary requirements of the guests looking to stay in a rural setting, whilst being

at one with nature.

## 18.0 Access and Car Parking

- 18.1 An existing access off the Farmington to Sherborne Road to the north of the site presently serves the land. The stretch of road along which the site will be accessed is within the national speed limit although it is a very quiet lane with little traffic and very slow existent speeds. An adequate visibility splay can be achieved in both directions to accord with the 'Manual for Streets'. The existing roadside vegetation is within the ownership of, and maintained by, the applicants and can be pruned as necessary to ensure no vegetation encroaches on visibility. No further alterations will be necessary from a highway perspective.
- 18.2 There will be minimal additional traffic movements in association with the proposal, over and above the existing farming use. Given this, it is assumed that Gloucestershire highways are unlikely to have any in principle objections. The photos below are taken from the existing access.

Figure 10: photos of existing access





- 18.3 The site is advantageous in that there is a matrix of footpaths connecting to neighbouring settlements that are located in relatively close proximity. The nearest one approximately 230m to the south-west of the site which visitors will be encouraged to use as a means of connectivity to the surrounding villages and facilities.
- 18.4 The small section of new track required to allow guests to access the cabins will be constructed of local crushed stone and the parking required will be provided directly adjacent to each cabin on an area of grasscrete, to reduce any impacts on the landscape and to offer a permeable, sustainable and eco-friendly solution.

## 19.0 Transport Options

- 19.1 The nearest regular bus provision to the site is in Northleach which offers a number of bus stops with connections to Oxford (S2), Cirencester (855), Moreton-in-Marsh (801) and Cheltenham (S2).
- 19.2 The applicants will also offer a 'pick up' service for those visitors who would like to be picked up from a train or bus station, and then use local services and facilities during their stay which would be wholly encouraged through the marketing of the site.
- 19.3 The guests will also have the use of electric bikes provided for them by the applicants during their stay.

## 20.0 Waste Management

- 20.1 The site does not have any option to connect to a public sewerage system – the farmstead and Farmington village itself is not connected to the mains sewer so connection is not feasible.
- 20.2 It is therefore proposed to utilise an Ecoflow type of sewage treatment system of sufficient capacity to deal with the cabins. The Ecoflow sewage treatment plant works by an effluent filter capturing all of the coarse material and the coconut husk-based filter organically treating the water and filtering out all of the remaining pollutants. Treated wastewater can then be directly discharged to the boundary ditch with an Environment Agency permit. This system is considered to be the most eco-friendly and sustainable on the market at this current time.
- 20.3 Bins will be provided for guests and recycling and composting will be encouraged as much as possible. It is proposed to instruct a local waste company to dispose of the waste.

## 21.0 Water Management

- 21.1 The site of the cabins does not lie within an area designated as at risk of flooding by

the environment agency nor will the proposal increase the risk of flooding elsewhere.

- 21.2 The only area of the application site that will effectively be non-permeable will be rainwater from the roofs of the cabins. The surface water from this will be collected in water butts and the water can then be reused. Any excess water will then drain to a soakaway.
- 21.3 The parking areas adjacent to the cabins will be constructed of permeable grasscrete which will freely drain and therefore cause no increase in run-off or have any other effect on drainage and the natural stone access track will also be wholly permeable.
- 21.4 The developed area has been kept to a minimum and rainwater harvesting is proposed to achieve sustainable drainage. As such the proposal will not increase the risk of flooding elsewhere.
- 21.5 The surface water treatment hierarchy considers permeable surfaces to be one of the more sustainable solutions as it provides flood and pollution reduction.

## 22.0 Environment and Landscaping

- 22.1 The site does not lie within any area designated as environmentally sensitive, including SSSIs, ESAs or BAP Priority Habitats. However, it does lie within an AONB.
- 22.2 The application is accompanied by an ecological report. This demonstrates that the site is suitable for the type of development proposed and suggests ecological enhancements which have been fully incorporated.
- 22.3 No nearby listed buildings nor Scheduled Ancient Monuments will be affected by the proposal.
- 22.4 Careful consideration has been given to ensure the siting and design will not result in a negative visual impact. The site is completely screened by existing mature vegetation which, combined with good design will ensure that the cabins do not have any visual harm on the existing landscape.
- 22.5 The cabins will not be visible from any public vantage point or public footpath given their proposed discreet location.
- 22.6 The applicants intend to continue to actively manage the woodland, improving the species and condition of the trees within and take great pride in their land holding as a whole.
- 22.7 The proposal is supported by a Landscape Visual Assessment undertaken by Landscape Matters which found that:

The magnitude of Landscape Effects will be Small positive

The magnitude of Visual Effects will move from Non-existent to Very small negative in the short-term improving post-construction to Very Small positive

By combining the magnitude of landscape effects with the magnitude of visual effects the overall nature of landscape and visual effects is considered to be Very Small / Small positive

- 22.8 The report confirmed that 'the scheme will provide an appropriately located, discrete, and attractive renewable energy powered log cabin development within the AONB, in addition to an ecologically and visually enhanced environment in keeping with the landscape character of the locality that will bring physical and mental health benefits to its recreational users'.

## 23.0 Biodiversity

- 23.1 An independent ecological survey was undertaken for the site with the purpose of:
- Identifying and recording habitats and important ecological features on site;
  - Evaluating the potential of the proposed development site to provide opportunities for protected species;
  - Determining any likely impact which the development and landscape proposals may have on these; and
  - Identifying opportunities for the enhancement of habitats and biodiversity features on site.
- 23.2 An assessment of the available habitats both on and adjacent to the site led to consideration of the potential of the site for badgers, bats, breeding birds, great crested newts, hazel dormice, and reptiles with the following findings:
- There are no historical records of badger at the site and no field signs were found within the search area. Hence, there would be no impact on badgers.
  - One tree at the south boundary of the woodland which provides 'low' potential as a roosting site for bat species.
  - An owl box mounted on the mature ash at the southern boundary was identified which does not appear to be occupied and no nesting sites were identified within the site area for breeding birds.
  - In terms of Great Crested Newts, no ponds were identified within 250m of the proposed development site and therefore no further survey work is required with regard to this species.
  - The woodland does not offer suitable opportunities for hazel dormice and food resources are limited.
  - The woodland offers limited opportunities for reptile species. Furthermore, the surrounding grazing paddocks offer little suitable habitat or dispersal opportunities.
- 23.3 The habitat assessment concluded that the existing trees offer limited value to wildlife other than their collective status as a plantation woodland and plans for the site include

the removal of non-native trees and replanting with native broadleaved species which will provide an overall improvement for biodiversity and the local landscape.

- 23.4 The report recommends mitigation measures to be undertaken to ensure no impact on any of the species to include:

The adoption of a wildlife sensitive lighting plan;

A thorough ground inspection to be completed prior to works commencing on site if works start between 1st March and 31st August (inclusive) in any given year. If breeding birds are found, an exclusion zone of 5 metres should be implemented and maintained until breeding is complete and the fledglings have left the nest;

A planting scheme for areas around the cabins to include a mixture of native shrubs and plants, suitable for the woodland setting;

The existing owl box mounted on the mature ash at the south boundary to be relocated away from the site and positioned at least 4m from ground level, within an isolated mature tree on the farm; and

The installation of three Woodcrete general purpose bat boxes, two Woodcrete cavity nesting bird boxes and two Woodcrete open-fronted nest boxes to be installed into mature trees within the woodland.

- 23.5 The applicants are happy to accept the imposition of a planning condition adhering to the mitigation requirements set out in the ecological appraisal to ensure no detrimental impact on any species that are not diseased and recommended for retention.

## 24.0 Trees

- 24.1 An independent Arboricultural Report has been undertaken for the site with the purpose of assessing the condition of the trees and hedges in the woodland in relation to the indicative siting of the cabins in the southern extent of the woodland where species are poorer and ash die-back is prevalent.

- 24.2 Following receipt of the report the cabins were positioned further into the site into the area where the felling of diseased trees was recommended. The report provides recommendations for tree management to address risk issues by selective felling of trees showing significant decline and risk profiles due to ash dieback (ash) and environmental stress (spruce).

- 24.3 Recommendations were also provided for the conservation and protection of viable older trees and any sections of established hedgerows (and their Root Protection Areas) as valuable biodiversity and landscape features.

- 24.4 The report also provides recommendations for supplementary planting of locally native tree and shrub species to reinforce the existing hedgerow structure to create a resilient, attractive and biodiverse setting for the cabins.

- 24.5 The report informed both the location of the cabins and associated parking and the positioning of the access track into the site which avoids any trees marked for retention and their root protection areas, removing only the declining or dead species with any losses replaced adjacent to the site in a suitable area as indicated on the plans that aligns with the applicant's future woodland management objectives. It should be noted that any trees recommended to be felled will be replaced with more robust and appropriate native species on a near 5:1 basis. See below for area of new woodland to be created through replacement (highlighted).

Figure 12: Proposed area for replacement trees



- 24.6 The report recommended that the dying trees be felled and replaced. They will be replaced with 300 new native trees in the area suggested as most suitable within the LVA (see plan above). This area of land is currently down to scrub, on sloping land that is periodically grazed. The Landscape Appraisal provided suggested that this is the most suitable area to create new woodland for habitat improvements and to strengthen green infrastructure links across the holding. This new planting would involve the creation of a new woodland to the east of the site, reinforcement of the existing hedgerows and the creation of a new hedgerow to the west of the access drive to minimise any light pollution experienced from car headlights at night. In addition to this the applicants have secured a grant to plant a hedgerow to the north of the site adjacent to the road, running along the length of the existing woodland. A further grant will be sought to continue this hedgerow east to west along the road in the following planting season.

- 24.7 In the withdrawn application an area of new woodland was proposed to the west of the

site – however, the proposed woodland to the east is considered a preferable location to better assimilate with the existing context.

- 24.8 This proposal is also accompanied by an Arboricultural Impact Assessment which extends on the original Arboricultural Report providing further information and recommendations for tree management, conservation and protection of trees and hedgerows with further suggestions for supplementary planting to compensate for the losses of any diseased trees that require felling.
- 24.9 The report concluded that a total of 74 trees within the woodland / hedgerows are showing signs of advanced Ash dieback and some Spruce showing crown death / thinning that are recommended to be felled and replaced in total. The proposals will facilitate 52 of these to be felled and these will be replaced with 300 new native trees in the area suggested as most suitable within the LVA (see plan above). The applicants will manage the remainder of the dying trees in the wider area in accordance with the recommendations set out within the report. Each tree will be replaced in the location suggested by the LVA to create a new native woodland on a near 5:1 basis.
- 24.10 Within the report it was suggested that the owl box is 'apparently active', which contradicts the findings of the Ecology survey. The ecologist has since confirmed that owl boxes could be used intermittently at this time of the year and suggests that the box should be re-located in December to a nearby mature tree on the edge of the woodland parcel with the box positioned at a height of 3m or more, facing east or south to benefit from sunlight hours. Since the reports were undertaken the applicants have been checking the box regularly to check for activity and haven't identified any. Therefore, a suitable mature Field Maple on the edge of the woodland has been identified to facilitate this relocation and highlighted on the site plan and will be moved in December.
- 24.11 It is considered that the proposal would be assisting with the long-term management of the woodlands on the holding and will facilitate the creation of a native woodland, reinforcement of hedgerows and new hedgerows that would further benefit biodiversity whilst removing poor, diseased and unsafe trees within the Copse. The proposal would therefore meet the requirement of the policies in regard to impact on trees.

## 25.0 Renewable Energy

- 25.1 The floor area of each cabin will not exceed 76m<sup>2</sup>; this is a very small-scale proposal with environmental sustainability at its core.
- 25.2 The applicants are very conscious that the cabins are of eco-friendly design, construction and materials and their power requirements will follow this ethos.
- 25.3 The cabins' energy requirements will be met by installing solar panels on an existing agricultural building that lies 30m south of the woodland thus significantly minimising

the carbon footprint.

- 25.4 It is considered that the solar panels proposed on the roof slope of an existing agricultural building within the farm holding could normally be delivered as permitted development under Class J – ‘installation or alteration etc. of solar equipment on non-domestic premises’ of The Town and Country Planning (General Permitted Development) (England) Order 2015. This is considered the most feasible option as erecting the panels on the cabins themselves will likely not provide enough sunlight given that they are on the edge of the woodland. By erecting the panels on the adjacent modern building, any excess can be used to help power the requirements of the wider farm which facilitates the applicants long term aim to use sustainable and renewable energy for the entire holding in the future.
- 25.5 Elevations of the farm building are provided alongside this planning application for completeness.
- 25.6 All lighting required in connection with the cabins will be wildlife friendly in accordance with the results of the ecology report which recommended the following:

Hedgerows and key habitat features including mature trees on the site will not be illuminated in order to retain dark movement corridors for nocturnal wildlife.

Any exterior security or decorative lights to be installed on the development site will be less than 3 m from the ground and fitted with hoods to direct the light below the horizontal plane, at an angle of less than seventy degrees from vertical, and shall not be fixed to, or directed at, bat boxes or gables or eaves.

Security lighting will be set on motion sensors with short timers (<1 minute) and will be LED with a passive infrared trigger.

External lights will be hooded and directed toward the ground to reduce upward light spill.

A warm white spectrum will be adopted throughout the scheme to reduce blue light component (<2700Kelvin).

Internal luminaires will be recessed where installed in proximity to windows to reduce glare and light spill. LED luminaires will be used internally where possible due to their sharp cut-off, lower intensity, and dimming capability.

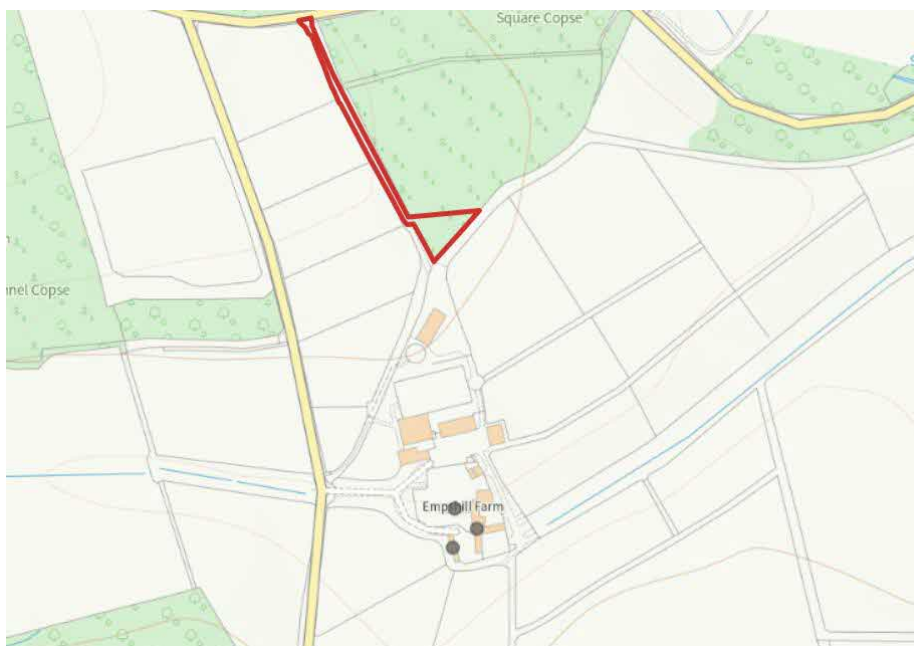
Luminaires will always be mounted horizontally with an upward light ratio of 0%.

- 25.7 Retaining the dark skies in the area is a priority for the applicants, having as minimal an impact as possible on wildlife and retaining the dark skies will also be a selling point for visitors.

## 26.0 Heritage Statement

- 26.1 The nearest listed buildings to the site comprise a cluster around the main farmstead that are grade 2 designated.
- 26.2 Figure 13 shows the location of the listed buildings in relation to the site.

Figure 13: Listed Building location in relation to the proposal – Black Dots (Source: Land App)



- 26.3 Historic England categorise the buildings as Grade II. The details to the listings are as follows:

#### EMPSHILL FARMHOUSE AND ADJOINING STABLEBLOCK

Detached farmhouse and adjoining stableblock. Late C18, altered and extended C19. Coursed squared and dressed limestone. Stone slate roof, ashlar stacks. Rectangular plan to main body with later out-shut to rear, partially converted stableblock right of main body. Main body; 2 storeys and attic, lit by single lights in gable ends. Four-windowed facade with 2-light double-chamfered stone-mullioned casements. C19 canted bays to left and right-hand bays on ground floor. Double-chamfered single light, right of C20 part-glazed plank door. Partially converted stableblock right 1½ storeys. Attic lit by C20 two-light roof dormer. Plank door and stable type door to ground floor. One 2-light casement and 2 fixed 6-pane windows. Gable-end stacks to main body, axial stack to stableblock. All stacks with moulded cappings. Interior not inspected. Forms one element in a close-knit group of farm buildings (q.v.). (Listing NGR: SP1410714703)

#### BARN ADJOINING EMPSHILL FARMHOUSE

Barn and adjoining outbuildings. Mid-late C18 with later extensions. Limestone rubble with dressed stone quoins, stone slate roof. Rectangular plan with projecting porch on east. Formerly open-fronted store with loft over to right. Open-fronted store runs away rear right. Double-doored entrance to barn off-centre left with gabled porch in wall opposite. Two ventilation slits with dressed



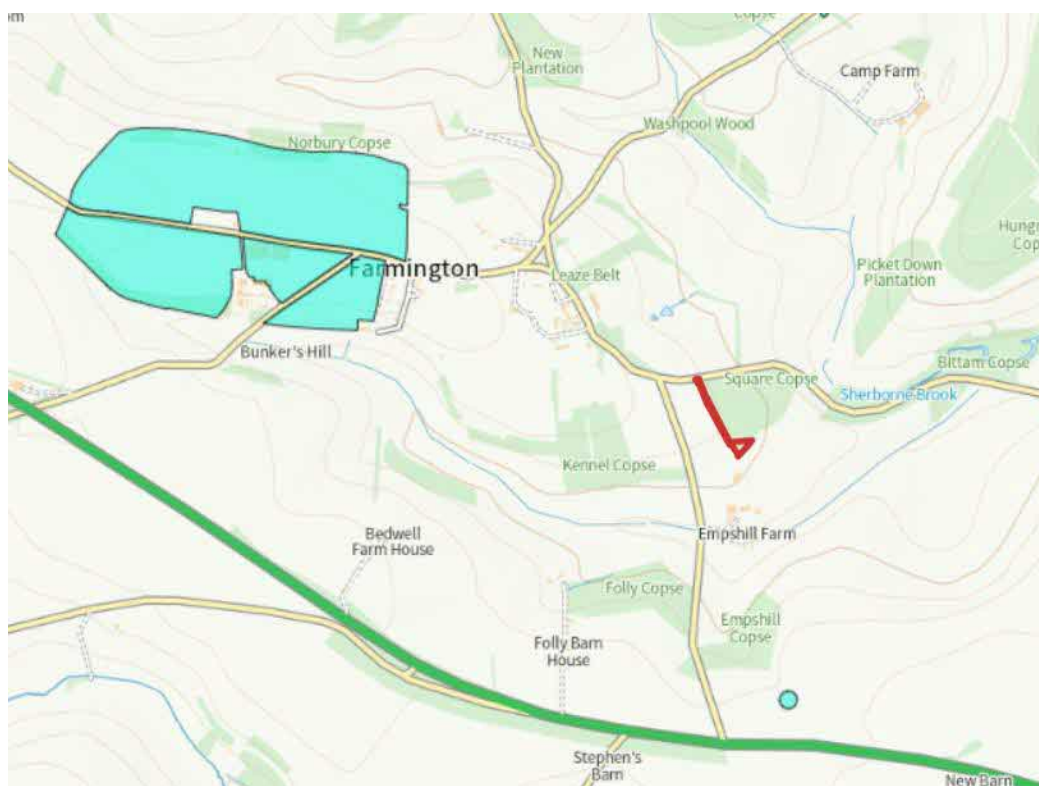
stone surrounds right. Barn interior; 4 bays with original collar and tie beam trusses with staggered purlins. Ramped walk-way up to plank door to loft over former open-fronted store to right. Ground floor formerly comprised two open bays with timber lintels (now blocked), doorway and casement inserted in blocking. Plank door with slatted upper half left. Single- storey open-fronted store with open-fronted bays, divided by square ashlar columns runs away rear right. Pointed finial at right gable end of formerly open-fronted store adjoining barn. Buildings comprise an important part in a farm group (q.v.). (Listing NGR: SP1412614686)

#### STABLES AND SHELTER SHED C25M SOUTH OF EMPHILL FARM

Stables and shelter shed. Late C18-early C19. Coursed squared and dressed limestone, stone slate roof. Long rectangular plan stepped down slope. Three open bays divided by square ashlar piers towards left. Two stable type doors right. Single plank door and double plank door to section with higher roofline to right. (Listing NGR: SP1410614669).

- 26.4 The proposal is placed on a parcel of land that is not in close proximity to the listed buildings associated with the farmstead. Lying between the heritage assets and the proposed cabins are numerous traditional and modern agricultural buildings / barns, stabling, ménage and existing vegetation and the cabins themselves will not be visible from any public road or footpath. In addition, the cabins will also not be visible from the listed building cluster and vice versa.
- 26.5 Notwithstanding this, the cabins are of a very simple construction, proposed without compromise to any existing building on the farm and the design and materials will complement the rural setting.
- 26.6 There are 3 Scheduled Ancient Monuments in the wider vicinity of the site. The plan below shows the proximity of the site to these existing heritage assets:

Figure 14: Plan showing Scheduled Ancient Monuments – in Blue (Source: Land App)



- 26.7 The SAMS comprise Norbury Camp which is the large area shown in blue above with the official listing detailing it as a 'large multivallate hillfort with a Romano-British settlement and long barrow collectively called Norbury Camp'. Historic England describe long barrows as constructed as earthen or drystone mounds with flanking ditches which acted as funerary monuments during the Early and Middle Neolithic periods (3400-2400 BC). They represent the burial places of Britain's early farming communities.
- 26.8 There are also two smaller 'bowl barrows' some distance to the west and south of the site which are smaller burial monuments dating from the late Neolithic period to the late Bronze Age.
- 26.9 These SAMS are a considerable distance away from the site of the cabins which negates any detrimental impact in this regard.
- 26.10 Given that the proposal will not impact on the listed buildings or SAMS and has been discreetly sited and designed to minimise its visual presence, any impact is considered to be negligible in this regard.

## 27.0 Benefits of the Proposal

### Economic Benefits

- 27.1 The proposal will provide a rural business opportunity within the local area and will ensure a valuable farm diversification income from the letting out of small-scale holiday accommodation. As farming incomes decrease because of national agricultural policy changes, it is imperative that the farm business identifies opportunities to utilise suitable, but less productive areas of land that will contribute to the overall success of the family farming business.
- 27.2 Visitors will be encouraged to spend money in the local area which will bring in valuable income to the local economy. As the site will be self-catered, guests will be encouraged to visit local farm shops, pubs and restaurants for their dining purposes. There are many visitor attractions within the local area and wider in the county, and it is proposed to provide extensive information packs within the accommodation which will detail places to visit in the surrounding areas, walking routes, ideas for days out and things to do and recommendations for local services and facilities. This is intended to ensure that the facility will help to promote and encourage tourism spend and enjoyment of the area as much as possible.
- 27.3 The proposal will provide immediate employment for at least one part-time person to run the site, providing cleaning and guest reception services, site maintenance etc.
- 27.4 Local amenities in the area will benefit vastly. Below is a schedule of amenities that will benefit from the proposal:

Local Amenity	Description	Distance
Bibury Trout Farm, Bibury	England's oldest working trout farm set in the historic village of Bibury. Beautiful gardens and grounds, fishing, barbecue hire, Crazy Golf, and café.	8.4 miles, 43 mins cycling
Cotwold Farm Park, Guiting Power	Famed rare breed farm with events and activities running daily, pony rides, tractor rides, soft play, trampolining, café and restaurant.	8.5 miles, 48 mins cycling
Cotwold Wildlife Park, Burford	One of the UK's largest zoological collections and breathtaking gardens, outdoor adventure activities, train ride, café and restaurant, range of activities that run daily throughout the year.	11 miles, 54 mins cycling, buses available
Broadway Tower,	A family-owned Cotswold destination set within a 200-acre estate of parkland,	15 miles, 1

Broadway	allowing visitors to experience great English heritage, with play areas, café and restaurant.	hr 14 mins
Chedworth Roman Villa, Cheltenham	One of Roman Britain's grandest villas, including in-situ mosaics, two bath-houses and water shrine, museum, café, shop and picnic area.	6 miles, 40 mins cycling
Sherborne National Trust Park	England's only surviving 17th-century grandstand, within a tranquil Cotswold estate full of diverse wildlife.	2.8 miles, 16 minutes cycling, 55 min walk
Cheltenham	Home to Cheltenham Races, Cheltenham is a Major town and shopping destination – supermarkets, industrial estates, petrol stations, shops, hair salons, cafes, pubs, restaurants, museums etc. Offers bus and train links to major travel network.	14 miles
Church of St Peter and St Paul, Northleach,	The Church of St Peter and St Paul, Northleach is one of the finest Cotswold wool churches. The church has been called "The Cathedral of the Cotswolds".	1.8 miles, 11 mins cycling
Northleach Village	Market town with pubs, shops, takeaways and a lively Charter Market is held every Wednesday. Offering bus links to Cheltenham and Oxford.	1.8 miles, 11 mins cycling, 35 min walk
Birdland, Bourton-on-the-Water	Set in nine acres of gardens and woodland, with over 500 birds, café	5 miles, 28 mins cycling, bus routes available
Model Village, Bourton-on-the-Water	The Model Village is the only grade II listed model village in the country. Built of Cotswold stone, it is a one-ninth scale model of the actual village.	5 miles, 28 mins cycling, bus routes available

Sudeley Castle, Winchcombe	Castle gardens and rooms, St. Marys Church, adventure playground, exhibitions, events held throughout the year.	12.4 miles, 1 hr 10 min cycling,
Westonbirt Arboretum,	One of the most beautiful and important plant collections in the world. With 15,000 specimens, and 2,500 species of tree from all over the world, the arboretum plays a vital part in research and conservation, family and walking trails, sculptures, sensory walks, adventure play, kitchen, pantry and smokehouse,	27 miles
Cotswold Motoring Museum & Toy Collection, Bourton-on-the-Water	Collection of rare vehicles and classic memorabilia, gift shop, home to infamous children's character 'Brum'.	5 miles, 28 mins cycling, bus routes available
Cotswold Falconry Centre, Garden Centre and Arboretum, Batsford	Batsford Arboretum is home to a unique collection of some of the world's most beautiful and rare trees, shrubs and bamboos spread across 56 acres. Large garden centre and restaurant / café. Falconry centre comprises flying displays, aviaries and native birds offering daily events and experiences.	14 miles
Cotswolds Distillery Visitor Centre, Stourton	Cotswolds Distillery opened in July 2014 and offers tasting tours and sessions, café, shop, events and experiences.	19 miles
Cirencester	Vibrant historic Roman town offering supermarkets, industrial estates, petrol stations, shops, hair salons, cafes, pubs, restaurants, museums etc. Links to bus services.	13 miles
Bourton-on-the-Water	Known as the 'Venice of the Cotswolds', this village offers a wealth of attractions and shops, restaurants, cafes and tea rooms.	5 miles

Nearby pubs and restaurants outside main towns	The Lamb Inn, Great Rissington Inn for All Seasons, Little Barrington The Mill Inn, Withington The Frog Mill, Shipton Oliffe The Royal Oak, Andoversford Sherborne Arms, Northleach	
--	--	--

#### Environmental Benefits

- 27.5 Environmental sustainability has been a core driving force behind the design of this proposal. The applicants have considered everything they can to reduce the need for guests to bring in their own cars and encourage low emission travel and use of public transport. The design of the cabins, being of an eco-friendly build and materials will ensure their future sustainability. The use of renewable energy to power them and rainwater harvesting to minimise water consumption will mean that aims for a low carbon future can be realised at this site. The applicants will also incorporate sustainable sourcing of fixtures, fittings and consumables such as cleaning products where at all possible in line with the eco-friendly ethos. The proposal will benefit the local area whilst reducing greenhouse gas emissions and will help the UK move to a low carbon future. Once at the site guests will be encouraged to walk the footpaths that connect the site to access local facilities and enjoy the wider landscape. In addition, environmental benefits will be gained by the proposal facilitating effective woodland management on the site, allowing biodiversity enhancements.

#### Social Benefits

- 27.6 The nature of the site will provide a relaxed and peaceful destination, away from the hustle and bustle of busy urban environments. This can be of significant benefit to the guests who visit, who are able to de-stress in a calm and eco-friendly location.
- 27.7 The site provides an opportunity for learning and education about farming, wildlife and nature on the site, which is tangibly beneficial for all.
- 27.8 The accommodation will be marketed towards guests seeking a quiet rural retreat. The overall tranquility of the site is part of its appeal and a major selling point and being at peace with nature is something that has become a significant factor in today's modern world. To 'take time out' from busy schedules is an important element of self-care and self-awareness which is increasingly being practiced. Mental health and wellbeing are also becoming increasingly more important factors when guests are choosing their holiday destination, and this proposal certainly focusses on these aspects due to its location, nature, and philosophy.

## 28.0 Planning principle and material considerations

- 28.1 A number of local policies are also relevant in the determination of this proposal, and these are assessed in turn below:

### Policy EC1 – Employment Development

- 28.2 Support for the proposal is afforded under policy EC1 which builds upon seeking sustainable economic growth in the district. In particular the proposal will meet criterion b and e of the policy respectively by allowing employment development where it 'maintains and enhances the vitality of the rural economy' and 'supports sustainable tourism in ways that enables the district to attract higher numbers of longer-stay visitors'. The proposal would result in a low-key tourism benefit to this rural area, with an increased visitor spend locally providing employment in running and maintaining the business.

### Policy EC5 – Rural Diversification

- 28.3 This policy offers support to the proposal as the criteria contained within the policy can be met in each case. Criterion a is concerned that there is no conflict with the existing farming operation that would prejudice its continued viable operation. The wider 309-acre farm will not be impacted by the proposal – it will continue to operate but with an additional income to support the farm and the local economy. Criterion b suggests that existing buildings are reused wherever possible. In this case there are no existing buildings on the holding that would be suitable for conversion of this nature. All buildings are actively in farming use and are not located such as to support glamping diversification. Criterion c is concerned with the scale and design of a development and in this case the proposal being of a very small scale and with a low-key design will be able to contribute positively to the character and appearance of the area.

### Policy EC11 – Tourist Accommodation

- 28.4 This policy considers the different types of tourist accommodation that will be considered. Glamping is not specifically referred to but its definition is widely accepted to mean 'glamorous camping' to provide an opportunity for nature to meet luxury. As such the proposal meets the requirements of part 7 of the policy which requires that a development of this nature 'is well related to the main tourist routes' which is the case with the cabins as they are strategically based to offer numerous opportunities to nearby tourist attractions. In addition, in a very recent appeal decision (APP/J0405/W/22/3308848) where the LPA have a very similar policy approach, the inspector considered that the NPPF was more positive in its encouragement of rural tourism development and did not endorse a restrictive requirement for accommodation to support a specific tourist attraction and subsequently allowed the appeal.
- 28.5 Criterion b requires that any new buildings are to be kept to the minimum necessary. In

the case of this proposal, it is not proposed for any additional buildings to be erected on site for the visitors e.g. shower block / laundry building. Visitors will just have use of the individual cabin for their stay, which provides an experience which is closer to nature and the environment without the additional facilities found on a more mainstream self-catered holiday site.

- 28.6 Given that the proposal is for caravan Act compliant structures, the proposal should be considered to fit within the section of the policy that considers touring caravan or camping sites (i.e. use of the land with potentially transient structures). Similar glamping proposals within the district have been considered to fit within this context, e.g. glamping domes, shepherds huts and timber cabins. Whilst these do not fit neatly into the categories within the tourism policies, they all fell within the definitions of a caravan and as such were granted approval on this basis. The Reasoned Justification to the policy appears to offer support to alternative methods of camping and caravanning by emphasising that "consideration should be given to proposals that incorporate more innovative and a variety of camping opportunities".
- 28.7 The Local Plan offers the opportunity to encourage the development of lower cost accommodation, such as caravan and camping sites, in order to improve tourism and encourage day visitors to stay longer, thus increasing the benefits to the local economy as in the case of this proposal.

#### Cotswolds Management Plan policy UE3 - Sustainable Tourism

- 28.8 This policy requires that tourism is delivered in such a way that minimises adverse effects on the natural beauty of the landscape and stresses that visitors should be provided with a variety of accommodation options over a range of prices. It is considered that the ethos, siting and design of this proposal is compatible with conserving and enhancing the natural beauty of the National Landscape including its special qualities.

#### Policy EN1 - Built, Natural and Historic Environment

- 28.9 This policy requires new development to promote the protection, conservation, and enhancement of the historic and natural environment. This proposal meets the relevant elements of this policy by ensuring that any heritage assets are not negatively impacted by the careful siting and design of the cabins. The proposal will also address climate change using renewable energy and sustainable materials and the very low-key design and natural materials proposed will complement the rural character of the area.

#### Policy EN2 – Design of the Built and Natural Environment

- 28.10 This policy is wholly concerned with the design of development and this proposal meets the requirements of the policy in that it has been sensitively designed to respect the character and distinctive appearance of the locality. The use of natural materials and the simple low-key design means that no alien features are introduced into the



rural location and the cabins will discreetly assimilate into the woodland and wider farming enterprise.

#### AONB Management Plan – outcome 1

- 28.11 The proposal will meet the objective of outcome 1 which will ensure that the National Landscape is a place that is mitigating and adapting to climate change and has a clearly defined pathway towards Net Zero emissions. Associated policies CC1 and CC2 also require proposals to mitigate towards and adapt to climate change – this proposal, which is environmentally and eco-friendly led will be contributing towards the aims of the AONB Management Plan in this regard.

#### Policy EN4 – The wider Natural and Historic Landscape

- 28.12 This policy is concerned with the wider landscape, and it is considered that this proposal, by its low-key nature and design would not have a significant detrimental impact on the natural and historic landscape in accordance with criterion a of the policy. The design and siting of the cabins have been led by the landscape character of the area which falls under LTC15 'farmed slopes' which are considered to support a mosaic of mixed farmland and woodland, which provides a textural backdrop to the surrounding lowland farmland. The settlement pattern generally comprises dispersed stone-built villages and farms with scattered outlying cottages and farmsteads strung out along local roads that climb the slopes and link the vale to upland landscapes beyond. The proposal will not alter the landscape character of the area but will provide an opportunity to better manage the woodland, on the edge of which the cabins are proposed to be sited, which will allow enhancement of the typical landscape character. The LCA suggests that 'where present, woodlands make a significant contribution to landscape character and form a textural backdrop to the Pastoral Lowlands'. The woodland will be maintained, and any losses will be directly replaced on the adjacent land where a new woodland will be created. Notwithstanding this the proposal will not be visible from any public vantage point to impact on the wider landscape.

#### AONB Management Plans policy CE1 - Landscape

- 28.13 The proposal will also meet the aims of the above policy which requires development to have regard to, be compatible with and reinforce, the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Character Assessment.

#### Policy EN5 – Cotswolds Area of Outstanding Natural Beauty

- 28.14 This policy is concerned with preserving the natural beauty of the AONB and stresses that great weight will be given to ensuring the conservation and enhancement of its special qualities. The proposal will not harm the natural beauty of the AONB nor cause any detriment to its special qualities as it has been sensitively designed to assimilate into the landscape and is not considered to be 'major development' in the context of

this policy given its very small-scale nature.

#### Policy EN7 – Trees, Hedgerows and Woodlands

- 28.15 This policy is concerned that development conserves any natural assets on a site such as existing trees and hedgerows. The proposal is considered to meet the requirements of this policy as it does not impact on any trees or hedgerows of high value or any veteran trees in accordance with criterion a. and b. The policy requires that where any trees are lost as part of a proposal that they are replaced and in this case the section of woodland where the proposal will be situated is in an area severely impacted by ash die-back and unfortunately some of these trees have already fallen naturally over the winters. The proposal will allow the woodland to be properly managed, and the worst affected specimens can be removed with compensatory planting adjacent to the site undertaken. Replacement species will be of a native broadleaved variety and the proposal allows an opportunity for the applicants to manage the losses in a sustainable manner that will conserve and enhance the woodlands overall, including the creation of an entirely new woodland area. An independent Tree Survey and Arboricultural Impact Assessment was commissioned and undertaken to support the planning application and to ensure that the positioning of the cabins on site would not be detrimental to any tree species deemed suitable for retention. In addition to extensive new tree planting it is proposed to plant extensive new sections of native hedgerows to further biodiversity at the site.

#### Policy EN8 – Biodiversity and Geodiversity: Features, Habitats and Species

- 28.16 The cabins will be sited on an area of woodland suffering significant ash die-back to minimise loss of trees that will be compensated for – overall it is not considered that the proposal would have any adverse impact upon biodiversity within or adjacent to the site and, in accordance with the independently commissioned biodiversity survey, provides an opportunity for net gain in biodiversity overall. Any loss of trees will be replaced with native species and existing hedgerows will remain unaffected by the proposal but will be enhanced to improve species. Additional woodland and hedgerow planting will ensure that biodiversity is significantly enhanced.

#### AONB Management Plans policy CE7 - Biodiversity and Nature Recovery

- 28.17 Contributing to biodiversity net gain will ensure that the proposal also complies with the requirements set out in the above policy.

#### AONB Management Plans policy CE5 - Dark Skies

- 28.18 The use of wildlife friendly lighting to ensure that the dark skies are maintained will also ensure that the proposal complies with the above policy.

#### Policy EN10 – Historic Environment: Designated Heritage Assets

- 28.19 This policy is concerned with protecting designated heritage assets. The farmstead

itself comprises a listed building and associated listed outbuildings that are sited over 250m away from the proposal. These are also separated by modern and traditional buildings, including stabling, ménage and existing mature vegetation. Given that the proposal will not impact on the listed buildings or any other heritage asset and will be discreetly sited and designed to minimise its visual presence, there is not considered to be any detrimental impact in this regard.

#### Policy EN14 – Managing Flood Risk & Policy INF8 – Water Management Infrastructure

- 28.20 These policies ensure that development does not occur within high-risk flood zones and that development does not exacerbate flooding elsewhere. The proposal lies outside the high-risk flood zones and is not in an area that is susceptible to surface water flooding. The parts of the policy relevant to the proposal is part 3 of ENV 14 and part c of INF 8 which requires that the design and layout of development proposals will take account of flood risk management and climate change and will include, unless demonstrably inappropriate, a Sustainable Drainage System (SuDS). This proposal embraces the principle of sustainable drainage as the surface water collected from the roofs of the cabins will be collected in water butts and reused to keep the new vegetation hydrated with any excess draining to a soakaway and the track will be local crushed stone with the parking areas utilising permeable grasscrete which will both freely drain and therefore cause no increase in run-off. The developed area has been kept to a minimum and the surface water treatment hierarchy considers permeable surfaces to be one of the more sustainable solutions as it provides flood and pollution reduction.
- 28.21 The proposal will also meet the aims of the AONB Management Plans policy CC5: Water which echoes the development plan policies above.

#### Policy INF3 – Sustainable Transport

- 28.22 This policy resonances with the NPPF in seeking to ensure that where possible development proposals can promote more sustainable modes of transport as an alternative to the use of the car. By its very nature the proposal is located in a rural location but opportunities to use alternative modes of transport will be actively promoted by the applicants through marketing, the website, information provided to guests and by offering a pickup service from local train or bus stations so that visitors can use alternative methods of transport during their stay which will add to the low-key glamping experience. Guests will also be offered the opportunity to use electric bikes during their stay. The nearest regular bus provision is in Northleach which can be accessed on foot or by bicycle.

#### Policy INF4 – Highway Safety

- 28.23 This policy requires proposals to demonstrate that they can accommodate a safe and suitable access and that the site is well integrated with the existing transport network to

ensure no risks to driver or pedestrian safety. The proposal will utilise an existing access from the Farmington to Sherborne Road to the north of the site which provides good visibility in both directions for cars entering and exiting the site and the existing roadside vegetation is already managed by the applicants.

#### Policy INF5 – Parking Provision

- 28.24 This policy is concerned with ensuring adequate parking provision is provided to meet the requirements of the development. It is proposed that 2 car parking spaces per cabin will be provided in the event that two family or friend groups wish to share the use of a cabin during their break. The parking provision will be set beside the cabins and will be of a grasscrete material to ensure that vegetation can grow up through to minimise impact on the environment.

#### Policy INF10 – Renewable and Low Carbon Energy Development

- 28.25 This policy is generally supportive of low or zero-carbon energy generating proposals that contribute positively to the aim of reducing CO2 providing there is no adverse impacts on the landscape. Criterion b is appropriate in this proposal as it requires renewable energy technologies to be of an appropriate type, scale, and design for the location and setting. In this instance the applicants intend to power the cabins solar panels on an adjacent farm building which helps to meet the government's overriding aim of moving to a low carbon future and the applicants aim of a carbon neutral farm in the future. The technology proposed is low key, requiring little external infrastructure.

## 29.0 Conclusion

- 29.1 This application is for a high quality, environmentally sensitive and appropriate small-scale tourism proposal to support farm diversification with the change of use of land to allow the siting of two caravan act compliant cabins.
- 29.2 It is considered that the proposed siting, location, design and scale are acceptable in the surroundings and will not detract from the character and rural nature of the area. There will be minimal impact on the landscape, which is to be mitigated against and the site provides suitable vehicular access to the highway and can deliver biodiversity net gain. It is also considered that the need for the proposal is genuine and justified.
- 29.3 Existing development plan policy, the NPPF and the AONB Management Plan supports rural businesses and the provision of appropriate small-scale tourism facilities to grow the rural economy. We consider this small-scale and sensitively located development is consistent with both national and local planning policy and as such planning approval is sought.

## Appendix 1 – Photos of BLC’s transportation / delivery

