

Beverley Smith, 3 St Wilfrids Street, Calverley, Pudsey LS28 5RQ

06 December 2022

Planning & Building Control Service
Development Management
Barnsley MBC
Westgate Plaza
PO Box 634
Barnsley S70 9GG

Dear Sir/Madam

**ERECTION OF TWO HOLIDAY LET CABINS (SUI GENERIS), WITH ASSOCIATED
DECKING AREA, PARKING AND ACCESS FOOTPATH
PLANNING STATEMENT FOR RESUBMITTED APPLICATION [colour denotes
amendments to resubmitted application]**

This planning application was first submitted in April 2021 (2021/0580). It was refused on 23 March 2022. The Reasons for Refusal were as follows:

1 The site lies within the Green Belt on the approved Barnsley Local Plan, where in accordance with Policy GB1 the Local Planning Authority will not permit new development except in very special circumstances, for purposes other than those set out in paragraph 149 of the National Planning Policy Framework. In the opinion of the LPA the proposed holiday cabins constitute inappropriate development contrary to policy and prejudicial to the character and openness of the Green Belt. Furthermore, there are no very special circumstances, sufficient to outweigh the harm to the Green Belt and other harm identified, therefore, planning permission is refused in this instance.

2 There is insufficient information provided to fully assess the impact on trees resulting from this development. Further, the proposed will impact on existing trees covered by a TPO. This is contrary to Local Plan Policy BIO1 and the accompanying guidance in the Trees and Hedgerows SPD.

3 The applicant has not applied the sequential approach to locating development as required by Local Plan Policy CC3 and paragraph 162 of the National Planning Policy Framework.

The full application is being resubmitted for two holiday let cabins on the Bence Farm site. The site layout has been amended to address matters raised in Reason for Refusal 2 and the Flood Risk Assessment has been augmented to include the Sequential Test, addressing Reason for Refusal 3. It is maintained that Very Special Circumstances exist for the inappropriate development in the Green Belt. There is a continuing need for holiday

accommodation in the area. Furthermore, as the development is within Urban Barnsley, on land that forms part of the garden Bence Farm Court and within the curtilage of the complex of buildings and now enclosed by residential development to the north, west and south, it is argued that there will be no harm to the openness of the Green Belt.

The application comprises the following information:

- Planning Application Form (with relevant certificates)
- Location Plan (red line plan)
- Blue Line Ownership Plan
- Site Layout Plan ([Revised JW1001-02-D](#))
- Floor Plans
- Elevations
- Foundation Plan ([Revised](#))
- Design and Access Statement ([Amended](#))
- Flood Risk Assessment [including Sequential Assessment](#)
- [Topographical Survey](#)
- Arboricultural Report ([Amended](#))
- Ecology Assessment [including Resubmission Letter](#)

This letter is the Planning Statement and provides information on the proposal with reference to the plans, site history, the NPPF and the case for the development, which provides the Very Special Circumstances for the development in this Green Belt location.

The Proposal

The proposed development is for the erection of two cabins for holiday let purposes. They are for a maximum of two people each. The wooden cabins are located within the curtilage of Bence Farm adjacent to an existing, new build garage block. They will be accessed from a footpath, from a newly created (permeable) parking area (for two cars) off the existing driveway serving the Bence Farm Court dwellings. [Note that the internal access road, parking and pathway have been amended to avoid tree root protection zones. In addition, an electric charging point has been added in the parking area.](#)

The proposed total footprint (GIA) of the cabins is 44sqm (each cabin has a footprint of 22sqm). A mezzanine floor is created inside each cabin to provide a sleeping area. The mezzanine floorspace of each cabin is 5.55sqm. The total floorspace of the two cabins is 55.10sqm (GIA). There is no formal garden area, instead wooden decking is provided to the northern eastern elevation. The total area of the decking is 24sqm.

The Elevation Plan and Foundation Plan ([Revised](#)) show that the cabins (and decking) are elevated and “sit” on (four) concrete foundation pads. [The finished floor levels of the cabins are 58.7m \(this is 1.4m above the recorded flood level\).](#) The cabins are designed to minimise their impact on their local environment and the amenity of residents and the double height space faces to the north east, away from existing dwellings. The only windows in the cabins are on this north eastern elevation. The height of the cabin at the north eastern elevation is 4200mm and 2125mm on the south eastern elevation.

Details of the proposed dwelling (including materials) are set out in the Design and Access Statement submitted as part of this application.

Planning History

The Bence Farm site was in agricultural use up to circa 1996. During its time as a working farm some of the land was used for equestrian purposes, the storage and use of caravans (including on land part of this current application for the cabins) and for camping. Part of the farmland was also purchased by Barnsley Council for the construction of Barnsley Road.



In the late 1990s permission was granted for the conversion of a range of farm buildings to form eight dwellings on the site. In addition, the block of (three) garages was built, immediately to the south of the application site.

Numbers 4 and 5 Bence Farm Court obtained planning permission in around 2010 for the development of garages in their gardens. This was on land not previously developed when the site was in agricultural use. [The land housing the caravans in the image above is within the ownership of the applicant and used as garden space.](#)

The site has undergone significant change over the past 25 years.

Planning Policy Context

The NPPF and Barnsley Local Plan form the relevant planning policy context for the determination of this application.

The site lies within the Green Belt. Consequently, Local Plan Policy GB1 is relevant as this policy seeks to protect the Green Belt in accordance with National Planning Policy (NPPF).

The NPPF (at paragraphs 143-146) considers development within the Green Belt. The development of holiday let cabins would be considered inappropriate development. Consequently, this would be considered harmful to the Green Belt and therefore the development should only be approved if very special circumstances can be demonstrated that outweigh any potential harm.

Relevant Issues in the Determination of the Proposal

Whether there are Very Special Circumstances that outweigh the harm to the Green Belt

The proposal is for two small scale holiday let cabins on land previously used for the storage and use of caravans and is currently used as garden space. It forms part of a wider development comprising conversions to eight dwellings, a large farmhouse, new build garage blocks and internal roads.

The Very Special Circumstances for this proposal are that the development will deliver economic benefits, which will have direct and indirect economic benefits for the local and wider economy. In addition, the proposal will help to promote and boost the visitor economy and tourism in the Borough in line with the Tourism Strategy for Barnsley (2017-2020) [and the Visit Britain Tourism Strategy 2020-2022. The latter seeks to promote tourism as a vital economic powerhouse and seeks to extend the length of visitor stays and short breaks throughout the regions.](#)

The applicant aims to rent out the cabins as holiday lets for a maximum of two people each cabin. This will provide direct income to them, income to people he employs to maintain and clean the properties and importantly will generate tourist income which will benefit the local economy in terms of visitor spend in hospitality venues and on “experiences” such as the Yorkshire Sculpture Park, Museums, Galleries, retail etc.

The Barnsley MBC Visitor Economy Strategy for Barnsley 2017-2020 states that the “*vision for the Visitor Economy is that: By 2020 Barnsley will be recognised as an emerging tourism destination and be seen as a place worth visiting.*”

This links with the Borough’s corporate priority of growing a thriving and vibrant economy. Further, the Strategy document states:

“To realise the potential of the visitor economy tourism in Barnsley we aim to do two things delivered over a sustained period of time:

- ***Enable improvement and investment in the products and experiences offered;***
- ***Develop promotion of the place that is truthful and compelling.***”

The aim is to realise real benefits which include:

- an enhanced profile for the Borough,
- increased visitor spend and economic impact,
- increased viability of attractions and visitor economy sector businesses,
- job creation,
- investment and an enhanced sense of pride in the Borough for residents.

It notes that domestic short breaks for leisure are a longer term and more lucrative opportunity and, also that almost half of domestic overnight trips to Yorkshire & the Humber are for short break holidays of 1 – 3 nights. Holiday trips to the region have grown by 4% on average each year since 2008, higher than the national average of 2%. Significantly, the economic impact of a day visitor is estimated to be in the region of £21.00 per person but this rises to approximately £38.00 for an overnight stay. Visit England data from 2019 set out in the Welcome to Yorkshire Tourism Data Report states that the average spend/night was £61.00, with average spend per trip being £170.00.

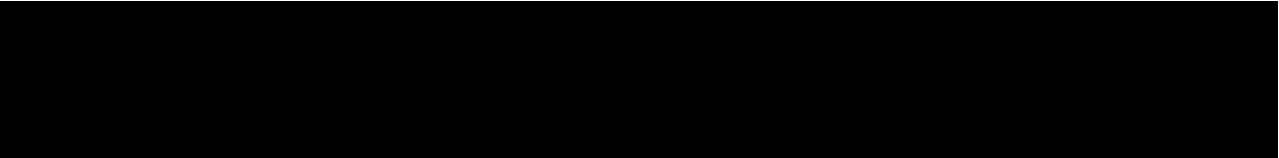
Capturing overnight stays has a clear economic benefit. But the Strategy document notes that a weakness of the Barnsley area is the *“narrow range of accommodation”*.

Having considered the Tourism Strategy and been involved with conversations and meetings regarding the Visitor Economy in Barnsley and Yorkshire the applicant is aware of the need to meet the demands of the future tourist market, whilst dealing with the impact of the Covid-19 pandemic. Visit Britain's Covid-19 Sentiment Tracker envisages that future post covid demand will come from the Gen-Z cohort; with disposable income and a willingness to spend money on diverse cultural experiences with an emphasis on the environment, adventure, and local food experiences.

To link with this, the applicant has identified a need for smaller scale holiday lets. The pandemic has caused significant disruption to the hospitality, retail, and tourism sectors and one outcome is an acceptance that large gatherings and meetings may be impacted in the future due to the potential spread of the virus. As a way of dealing with future disruption and seeking to adapt to the pandemic, the applicant is keen to promote tourism in Barnsley and to generate income by creating secluded, small scale, self-catering holiday lets.

The applicant owns 4 Bence Farm Court (a four bedroomed property). He began letting out the property as a holiday let in July 2017, after identifying that there was demand for holiday accommodation for 6+ people in the area. He found that supply was extremely limited or non-existent. Most of the supply was in Leeds or Sheffield. Investigations of holiday let websites also revealed that there were limited large, high specification properties in accessible, countryside locations.

Prior to the pandemic, the applicant was able to rent his home out regularly and could generate an income, whilst employing a local cleaner, using a local professional laundry and local tradesmen to maintain the property. In the year March 2019 – March 2020 the property was occupied for around 140 nights. The average stay was 2-3 nights, mostly at weekends and during school holidays and the average number staying at the property was 8 people.



The applicant and his wife maintained an active role in advertising the property, welcoming guests and offering advice and pre-arrival guidance about places to visit in the vicinity. Their own research indicated that whilst some guests attended weddings or visited family and friends, almost 95% of the guests were first time visitors to Barnsley. Because they were first time visitors, the applicant provided details of “things to do and see” in the local area and actively promoted Barnsley as a tourist destination.

The most popular recommendations provided were:

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- Restaurants and pubs in a 10km radius from the property.
- Visitor attractions - Cannon Hall Farm, YSP, National Coal Mining Museum.
- Barnsley Town Centre for retail and food and drink experiences.
- Local festivals such as the annual ‘Underneath the Stars’ festival in Cawthorne.
- Local countryside walks

The applicant’s commitment to promoting the tourism offer in and around Barnsley has led to positive reviews, repeat stays and recommendations to other visitors.

The impact of restrictions imposed due to the pandemic has meant that the applicant has not been able to rent out his property at 4 Bence Farm Court. Self-catering accommodation has been forced to close during the various lockdowns and, when allowed to be open, bookings can only be for small, single household groups. It has not been economically viable to rent the property to just two people due to fixed costs and overheads. It is likely that restrictions will be in place for the foreseeable future which has led to the consideration of alternative holiday let provision.

The high level of enquiries for small scale, self-catering accommodation for couples/two people in a secluded location, but still accessible to local amenities, venues and visitor attractions has prompted the applicant to submit the proposal before the council.

The applicant states the following:

“We are classed as a premium listing for our existing rental property and are immensely proud of what we can offer visitors (many of whom are new to the area). However, we need to address the “disruption” in the holiday market and in our circumstances by creating something equally as special, beautiful, safe, small scale and environmentally appealing. We love where we live, and we love to promote it. We think there is a huge market for “staycations”, small holiday lets and properties close to towns and cities but in the quiet, secluded locations like our proposed cabins.”

Summary: The application for the cabins meets an identified need for accommodation in the Borough and will help to support and stimulate the tourism economy in accordance with Barnsley’s own tourism strategy. The applicants have a successful track record in contributing to the tourism sector through the letting of their property to large groups but have been thwarted over the past 12 months due to the Covid-19 pandemic. Prior to this

they created direct and indirect economic benefits to the local economy. Each stay generated costs on average [REDACTED] which were spent in the local economy and in local businesses by the applicants themselves. The stays also generated a direct net income for the applicants. In addition, the visitors themselves contributed directly to the local economy through spend on leisure activities and hospitality.

The Barnsley Tourism Strategy estimates the economic impact of a visitor overnight stay to be £38.00.



The contribution to the economy and Barnsley's tourism sector amounts to very special circumstances.

The economic case for the development has not materially changed since the application was first submitted. The need for holiday accommodation remains high as people choose to holiday in the UK, holiday more locally and take short breaks post Covid. This is due to a range of "disruptive" factors including extreme economic uncertainty and ongoing labour force disruptions. Officer (Head of Culture and Tourism) support remains for the proposal. The previous Officer's Report noted that weight could be afforded to the economic case for the proposal and that as such it complies with Local Plan policies E5 (Tourism) and E6 (Rural Economy).

Other Planning Matters

Other matters that are relevant to the consideration of this application include:

- Scale, location, and amenity
- Highways
- Ecology
- Trees
- Flood Risk

Scale, Location and Amenity – Impact on Openness

The cabins are located in the north eastern corner of the Bence Farm site. They are located in a residential area of Urban Barnsley within the Darton District. There is housing to the south and west, and now to the north following the recent approval of 3 new dwellings in the Green Belt at the Livery stables on Barnsley Road (2021/1571).

The small scale cabins are orientated to maximise views out of the site but also to avoid overlooking of existing dwellings and to maintain the privacy of the visitors and existing residents. The windows and doors are orientated away from existing properties again to reduce any potential impact on amenity.

When viewed from the [west and the south](#), the design, wooden materials and pitch of the green roof ensures that the cabins blend into their environment and reduce their visual impact for anyone walking or driving onto the site.

The dense tree cover to the north and east also means that the [visual](#) impact of the cabins is significantly reduced.

With the application [2021/1571](#) at the Livery Stables on Barnsley Road adjacent to this site, the Officer's Report noted that there was no adverse impact on the openness of the Green Belt due to the scale of the proposed development of 3 houses and because residential use was not out of character in the area.

It is appropriate, then, to apply the same conclusion to the proposed development of the 2 small cabins; with a total floorspace of just 55sqm GIA. Note that the housing in application [2021/1571](#) has a floorspace of 290sqm over two storeys. The cabins are located within the curtilage of the Bence Farm "complex" of buildings and the land forms part of the garden of 4 Bence Farm Court. The land has previously been used for caravans as shown above.

As with the approved housing scheme to the north of the site, there is no adverse impact on the openness of the Green Belt. Indeed, following the approval of the housing scheme, this proposal is now surrounded by housing on three sides.

Highways

In pre-application discussions no highways issues have been identified. The proposed development can be accessed safely from Barnsley Road and off-road car parking for two vehicles is provided. The dedicated parking area does not impact on residents parking. It is located close to the access into the site, therefore removing any potential disturbance to residents.

Ecology

The Pre-Application advice letter suggests that an ecological survey is required for development in this northern part of the site to assess whether there are any species of significance using the site. The design approach has been chosen to limit any impact on wildlife that may be using the site. Construction methods and limited ground works will also minimise any potential disturbance to the land and the ditch.

The applicant regularly uses the site for amenity purposes, accesses the ditch/stream, uses the foot bridge and visits the pond. It is essentially his "back garden". Consequently, there is already a high level of disturbance through residential/domestic use.

A Preliminary Ecological Assessment [PEA] has been undertaken by Parsons Ecology [and was amended in January 2022. An additional covering letter has been submitted with this resubmitted application.](#) The ecologist advises that the changes to the foundation design and the amendments to the parking and footpath will further reduce the ecological impact of the development and do not affect any recommendations made within the PEA, which should be considered valid in support of the resubmission of this application.

The following precautionary measures and mitigation, in terms of protected species, are recommended:

Bats: Low UV lighting to reduce light spillage from the cabins should be provided along with landscaping to enhance foraging habitats and enhancing bat roost resources via the provision of bat boxes;

Badgers: no badgers were found on site and no mitigation is recommended;

Breeding Birds: It is recommended that any vegetation removal is timed to take place outside of the bird breeding season (considered to be March to August inclusive) in order to comply with the Wildlife and Countryside Act 1981.

Reptiles and GCN: The site is unlikely to support large or moderate populations of reptiles. Nevertheless, suitable reptile habitat is present on site. As such, it is recommended that any potential refugia (such as rubble piles) should be dismantled by hand under the supervision of an appropriately experienced ecologist. Should small numbers of reptiles be encountered these will be relocated by the ecologist on site to alternative suitable reptile habitat within the landholding. Analysis by the ecologist indicates that the site is unlikely to support GCN. Nevertheless, the mitigation recommendations made in respect of reptiles (above) will reduce any potential impacts to this species. If GCN are encountered at any time during the works, all works will cease, and further advice sought from Natural England.

A suitable condition can be imposed which would introduce measures to mitigate and enhance the ecology of the site in line with the recommendations made in the Ecological Assessment.

The trees on the site were also considered. The ecologist notes that there are scattered trees on the site and that they are generally young sycamore and ash. Notable scattered trees within and/or adjacent to the site include a mature crack willow *Salix fragilis*, (TN4), a semi-mature sycamore (TN5), a semi-mature sycamore (TN6), a semi-mature sycamore (TN7), a multi-stem semi-mature sycamore (TN8), a mature horse chestnut - *Aesculus hippocastanum* (TN9) and a semi-mature horse chestnut (TN10). These trees are identified on the Habitat Plan at Appendix 2 of the Ecology Assessment. [Further assessment of the trees is set out in the Arboricultural Report.](#)

Trees

[A revised Arboricultural Report has been prepared for this re-submitted application.](#)

[The reason for refusal stated that there was insufficient information to fully assess the impact on trees and that the proposal would impact on existing trees covered by a TPO.](#)

[The site layout has been amended to reduce the impact on the trees at the site, particularly those trees subject to a TPO \(T4 and T5\). The vehicular access, footpath and parking areas have been revised and are located away from the root protection areas. It is concluded that encroachment into the RPAs is minor, and that with suitable care taken during construction the trees will be unaffected.](#)

G12 is a group of self seeded Ash, which will be removed as part of the development proposals. They are suffering symptoms of Ash Dieback and are considered to be of limited value. New tree planting on the site can offset the loss of these diseased trees.

T13 – crack willow – requires immediate pruning attention irrespective of the development due to its current condition. The recommended pruning will also help to preserve the tree. The pruning works will be carried out in consultation with the ecologist to ensure that no bat roosts are present. (The ecological survey identified that there were no bat roosts on the site).

Flood Risk and Drainage

Surface water drainage will be via the existing ditch adjacent to the proposed cabins. Foul drainage will be to the existing drainage on site and then to the public sewer.

A topographical survey has been undertaken to provide accurate site levels. This is submitted with the application.

The site falls within Flood Risk Zone 2. An Exceptions Test is not required for the use proposed. The primary flood risk to the site is fluvial flooding from the River Dearne which runs approximately 120m to the east of the site. The maximum flood levels from the River Dearne in this locality are estimated as 57.50m AOD based on actual flood levels identified by the applicant, a resident of Bence Farm during the flooding of 2007 with an allowance of +0.2m for climate change over the life of the development.

The development proposals are greater 1.0m above the maximum (1:200 RP) flood level. Hence, the development is at low (insignificant) risk of flooding. The proposals also include for permeable surfaces (SuDS) and no increase in surface run-off into the Dearne is anticipated.

A sequential assessment is required as the proposal falls within Flood Zone 2. The details of this assessment are set out in the revised FRA. The applicant owns all of the land within the “Blue Line” Plan. It is considered that the location identified is the most suitable location given its height above the known flood level. A number of potential alternative sites have been considered within the Darton area of Urban Barnsley. These sites include small scale housing allocations below 1ha, small scale sites identified in the SHELAA and sites that have been marketed locally (for residential purposes). All of the sites have now either been developed for residential use or are not available to the applicant due to the scale of the sites and the fact that they are not being actively marketed.

Summary

This resubmitted application has been amended to address the reasons for refusal set out in the Decision Notice of March 2022. The layout of the internal roads, paths and parking area have been amended to reduce impacts on the protected trees on the site, further details of the foundation design have been provided, which further reduces potential ecological impacts. A sequential assessment has been undertaken to demonstrate that there are no locally available sites which could accommodate the holiday lets proposed.

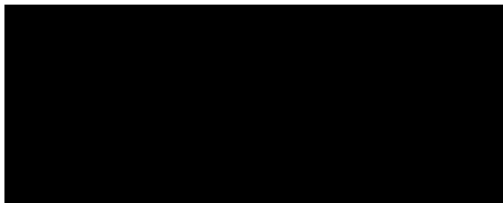
Furthermore, the economic need for the holiday lets remains and this has been acknowledged previously.

This proposal for two holiday let cabins on the Bence Farm Court site would not harm the Green Belt and there are very special circumstances that justify the development on economic and tourism grounds. The cabins are in a residential area (as acknowledged by the decision to approve three dwellings in the Green Belt adjacent to this proposal), with housing to the north, south and west. The site is within the defined area of Urban Barnsley. The need for the holiday accommodation and the design features which aim to mitigate any potential visual harm to the Green Belt will not lead to a harmful impact on openness.

The cabins will have limited environmental impact and have been carefully designed and located to minimise any residential impact and any impact on bats and birds. Any ecological impact can be successfully mitigated and enhanced, and this can be secured by appropriate planning conditions.

We respectfully request that this application is recommended for approval. We also request that this application is considered by the Planning Committee. If you require any further information to assist with your decision making, then please do not hesitate to contact me.

Yours sincerely



BEVERLEY SMITH
Cc Paul Woodcock

APPENDIX 1: PLANNING HISTORY

	Application Ref	Description	Decision
1	2015/0891/COU	Change of use of three agricultural buildings to form one dwelling	Approved December 2015
2	2016/0670/DOC	Discharge of conditions relating to Change of use dwelling	Approved August 2016
3	2016/1059/FULM	Change of use of buildings to form 23 dwellings	Refused March 2017
4	2018/0596/CPE	Lawful implementation of 2015/0891/COU	Approved September 2018
5	2018/0270/OUTM	Application for five dwellings	Refused November 2018 Appeal Dismissed November 2019
6	2019/0400/DEM	Prior Notification of Demolition of buildings	Approved October 2019
7	PD/2019/0061 2020/0956/CPE	Informal PD request for extension to existing Bungalow and Lawful Use Certificate	Approved November 2020
8	2020/0258/ATD 2020/0259/ATD 2020/0278/ATD 2020/0279/ATD 2020/0287/ATD	Prior Notification of the conversion of 5 agricultural buildings to dwellings	Approved August 2020
9	2020/1044/DEM	Prior notification of demolition of wooden framed barn	Approved October 2020