

Temporary siting for a 2 year period of 7 cabins for staff accommodation with associated works including timber bin store, hardstanding and new landscaping (retrospective) at New Farm Daylesford Adlestrop Gloucestershire GL56 0YG

Full Application 23/02370/FUL	
Applicant:	Daylesford Organic Ltd
Agent:	Edgars
Case Officer:	Andrew Moody
Ward Member(s):	Councillor David Cunningham
Committee Date:	7th February 2024
RECOMMENDATION:	REFUSE

1. Main Issues:

- (a) Background and the principle of development
- (b) Landscape impact within the Cotswolds National Landscape (CNL)
- (c) CIL

2. Reasons for Referral:

- 2.1 The application is referred for Members to consider whether there is justification for the accommodation to be retained for a temporary 2-year period, owing to the previous refusal of planning permission (19/04004/FUL) and the extant Enforcement Notice requiring the removal of the cabins and the re-instatement of the site.

3. Site Description:

- 3.1 The application site is located to the west of the existing complex of buildings at Daylesford Organic Farm, with the proposal relating to the siting of 7 cabins, in addition to a timber bin store, in a wooded area adjacent to the railway line. The cabins are occupied by staff employed at the site.
- 3.2 The site is located within the Cotswolds AONB, and the site is outside any development boundary in the Local Plan.

4. Relevant Planning History:

- 4.1 There is a lengthy planning history for the site as set out below, which includes the following: -
- 4.2 01/02243/FUL: Conversion of redundant farm buildings to (1) farm shop; (2) cheese/dairy creamery (B1 Use), closure of vehicular access and re-siting. Provision of car parking. Granted 27.11.2001
- 4.3 03/03115/FUL: Conversion of estate farm buildings to A1 shop use. Granted 23.1.2004

- 4.4 04/00637/FUL: Conversion of redundant farm building to part B1 Craft Workshop and Part D1 Education Training Centre. Granted 15.4.2004
- 4.5 04/01814/FUL: Change of Use/Conversion of redundant straw store to mixed use B1 and B8 Uses. Granted 2.9.2004
- 4.6 05/02035/FUL: Modification of conditions 9 & 10 of CD.5090/Q, to allow 1.The Garden Room to be used for the sale of flowers, vases, containers, gardening books & tools (tool handles produced from wood that is grown on the Estate). Some of the products that are sold are produced, or in some cases part-produced, on the Estate. 2. Bamford Barn to be used for the sale of clothes designed by the Estate owner, manufactured worldwide. Withdrawn 11.10.2005
- 4.7 06/00013/FUL: Change of use of part of workshop for mixed B1 and B8 uses on temporary basis (part retrospective). Granted 24.2.2006
- 4.8 06/02772/FUL: Amendments to planning permission CD.5090/U including extension to mezzanine floor and alterations to external appearance. Granted 28.12.2006
- 4.9 07/01981/FUL: Installation of mezzanine floor; change of use of building from agricultural to mixed B1 and B2 uses involving bakery/patisserie, creamery and cheese making facility. Granted 24.10.2007
- 4.10 07/02530/FUL: Change of use from temporary B8 (Warehouse/Distribution) and B1 (Office) to permanent B8/B1 uses ancillary to Daylesford Estate Farm Shop. Granted 13.11.2007
- 4.11 07/03532/FUL: Continued use of former B1 offices to A1 retail ancillary to Organic Farm Shop. Granted 29.2.2008
- 4.12 08/00292/FUL: Change of use of part of the building from agriculture to a bakery and extension to existing building. Granted 28.3.2008
- 4.13 09/00812/FUL: Stopping up of two existing access points to the highway, construction of two new highway access points and roadway, removal of hedgerow on the road frontage, extension and alterations to parking areas and retrospective consent for the erection of a detached building (use class D1). Refused 10.2.2010
- 4.14 09/00828/FUL: Change of use of part of building to include educational cookery school in addition to the existing retail and office use, together with the installation of an additional rooflight. Granted 15.5.2009
- 4.15 14/02628/FUL: Erection of single storey extension to the Hay Barn (Retrospective). Granted 27.8.2014
- 4.16 14/03749/FUL: Proposed extension to Hay Barn to provide treatment rooms, consultation room and gym, relocation of existing timber chalets. Granted 9.10.2014
- 4.17 14/04441/FUL: Retrospective application for erection of glazed link and pergola/store. Granted 19.11.2014

- 4.18 14/04449/FUL: Retrospective Change of Use from craft workshop to spa/wellbeing centre. Granted 19.11.2014
- 4.19 14/04490/FUL: Retrospective change of use to the farmhouse from Staff Accommodation (Class C3) to Holiday Let/Staff Accommodation (Classes C1/C3). Granted 19.11.2014
- 4.20 14/04491/FUL: Retrospective change of use to the farmhouse from Staff Accommodation (Class C3) to Holiday Let/Staff Accommodation (Classes C1/C3). Granted 19.11.2014
- 4.21 15/03959/FUL: Proposed new building for office / child care facility ancillary to New Farm B1(a)/D1(b). Granted 10.02.2016
- 4.22 16/01434/FUL: Demolition of existing building, erection of two storey building with single storey lean-to and small conservatory Use Class B1/A1. Granted 12.05.2016
- 4.23 16/02755/AGFO: Erection of agricultural storage building. Prior approval not required 25.07.2016
- 4.24 16/04050/FUL: Retrospective application to construct an extension to the farm shop complex to form Pizza Bar (Use Class A3/B1). Granted 31.10.2016
- 4.25 17/00926/FUL: Retrospective application for new entrance porches to home and garden barns/farmshop, amendments to previous approved conservatory. Granted 21.04.2017
- 4.26 17/02668/FUL: Change of use to form creche with use class D1(b) and B1 office. Granted 26.07.2017
- 4.27 17/02789/FUL: New staff car park. Granted 31.08.2017
- 4.28 18/01513/FUL: Installation of reed bed and infiltration system. Granted 18.06.2018
- 4.29 18/01547/FUL: Erection of new office/warehouse and laundry buildings (use class B1a and B8) with additional car parking and site works. Granted 12.10.2018
- 4.30 18/04960/FUL: Extensions to the Trough Restaurant (part retrospective). Granted 11.02.2019
- 4.31 18/04961/FUL: Change of use from office (Class B1(a)) and storage (Class B8) with ancillary staff and laundry facilities to spa/wellbeing centre (Class D2); erection of a single storey extension and external alterations. Granted 15.02.2019
- 4.32 18/04972/FUL: Erection of new office/warehouse and laundry buildings (use class B1a and B8) with additional car parking and site works (part retrospective) - amendment to permission: 18/01547/FUL. Granted 22.02.2019

- 4.33 19/01258/FUL: Change of use from existing creche to holiday cottage (Class C3) with associated internal and external alterations and provision of additional parking (part retrospective). Granted 15.05.2019
- 4.34 19/01259/FUL: Change of use of agricultural building to provide biomass plant and associated facilities and the installation of staff welfare facilities with associated external alterations (part retrospective). Granted 15.05.2019
- 4.35 19/01260/FUL: Change of use from workshop warehouse and distribution (Class B1/B8) to a gym and clubhouse with ancillary facilities (Class D2) including associated external works. Granted 21.06.2019
- 4.36 19/01281/FUL: Alterations to existing car parking with associated access and landscaping. Granted 22.05.2019
- 4.37 19/01337/FUL: Erection of Market Garden event centre and restaurant with associated access, parking and landscaping works. Granted 05.11.2019
- 4.38 19/03593/FUL: Variation of conditions 2 (drawing numbers), 6 (fire hydrant) and 8 (parking and turning) of planning permission 19/01260/FUL (Change of use from workshop warehouse and distribution (Class B1/B8) to a gym and clubhouse with ancillary facilities (Class D2) including associated external works) for alterations to the design of the building. Granted 11.11.2019
- 4.39 19/04004/FUL: Siting of 7 cabins for temporary staff accommodation for a period of 3 years with associated works (retrospective). Refused 19.12.2019
- 4.40 20/04054/FUL: Extension to existing car parking with associated access and landscaping. Refused 19.01.2021
- 4.41 20/04423/FUL: Erection of an enclosure to house electrical equipment, provision of covered loading area, alteration to existing car park with associated landscaping and other works (part-retrospective). Granted 01.02.2021
- 4.42 21/01011/FUL: Partial conversion and extension of workshop, warehouse and distribution building to form retail area for garden and associated products and associated external works (part retrospective). Granted 27.04.2021
- 4.43 21/01379/FUL: Erection of a 22 metre high monopole supporting 6 no. antennas and a transmission dish at the top of the pole, an equipment cabinet at ground level and development ancillary thereto. Granted 09.07.2021
- 4.44 22/04482/FUL: Erection of Market Garden event centre, workshop/ceremony space and ancillary rooms with access, parking, landscaping and associated works (part retrospective). Granted 10.02.2023

5. Planning Policies:

- TNPPF The National Planning Policy Framework
- DS4 Open Market Housing o/s Principal/non-Pr

- H5 Dwellings-Rural Workers o/s Settlements
- EN1 Built, Natural & Historic Environment
- EN2 Design of Built & Natural Environment
- EN4 The Wider Natural & Historic Landscape
- EN5 Cotswolds AONB
- EN15 Pollution & Contaminated Land
- INF4 Highway Safety
- INF5 Parking Provision

6. Observations of Consultees:

- 6.1 Independent Consultant: No essential need to retain the cabins
- 6.2 Landscape Officer: No objection subject to conditions on the basis of the proposal being for a temporary period

7. View of Town/Parish Council:

- 7.1 No response received.

8. Other Representations:

- 8.1 2 representations objecting to the application has been received, raising the following points:
- this matter has been ongoing for 6 years
 - accommodation is required for the retail operation and visitor facilities and not the farm
 - bridleway has been turned into a road
 - assertion that cars are not parked at the site are false
 - site outside any development boundary
 - urbanises an area of open countryside
 - the applicants have created their own accommodation shortage
 - legal agreement can be varied

9. Applicant's Supporting Information:

- Planning, Design and Access Statement
- Proposed Plans

10. Officer's Assessment:

(a) Background and the Principle of Development

- 10.1 The application is retrospective for the retention of 7 cabins, each containing 2 single bedrooms, which have been sited within a clearing in a hollow area to the west of the complex of buildings at New Farm, Daylesford. The cabins are single storey, with flat roofs, and are coloured dark green, and the permission is requested for a temporary

2-year period. A Legal Agreement has also been proposed to secure the removal of the cabins at the end of this period.

- 10.2 The cabins were brought to the Council's attention by way of an enforcement complaint received in August 2019. A subsequent planning application (19/04004/FUL) was refused with the following two reasons for refusal:

1. The application site is located outside any Principal or Non-Principal Settlement designated in the Cotswold District Local Plan. The site is also located in an isolated location in the open countryside which is remote from services, facilities, amenities and public transport links. The site does not represent a sustainable location for new residential development unless it can be shown that there are special circumstances such as the essential need for worker(s) to live permanently at or near their place of work. In this instance it has not been demonstrated that there is an essential need for the 7 cabins containing 14 bedrooms of residential accommodation to be provided on the site. It is therefore considered that the proposed development would be contrary to Cotswold District Local Plan Policies DS4 and H5 and guidance contained in the National Planning Policy Framework, in particular Paragraph 79.

2. The application site is located within the Cotswolds Area of Outstanding Natural Beauty (AONB), wherein the Local Planning Authority is statutorily required to have regard to the purpose of conserving and enhancing the natural beauty of the landscape. The proposed development, by virtue of its location within the rural Cotswolds AONB landscape and the cumulative impact caused by this scheme and the existing farm complex on landscape character and dark skies will have a significant urbanising and cumulative impact on the AONB landscape. It is considered that the proposal would fail to conserve or enhance the natural beauty and tranquillity of the AONB and would be contrary to Section 85 of the Countryside and Rights of Way (CROW) Act 2000, Cotswold District Local Plan Policies EN2, EN4 and EN5 and NPPF paragraphs 170 and 172.

- 10.3 No appeal was lodged against this decision, and an Enforcement Notice was issued effective from 3rd April 2020 requiring the cabins to be removed and the site reinstated. The compliance date for the Notice was set at 3rd April 2021 as, following discussions with the applicant's representatives, alternative options were being explored that would allow the cabins to be removed.

- 10.4 However, owing to the Covid pandemic, such alternative measures did not come to fruition. In addition, the Courts did not hear planning enforcement related cases during the periods of lockdown and, given the backlog in the legal system that arose during this time, this matter did not get referred to the Courts for prosecution for non-compliance.

- 10.5 The current application seeks to provide an alternative justification for the retention of the cabins as staff accommodation, rather than as rural workers accommodation that would be assessed against paragraph 84 of the NPPF. This includes drawing attention to other sites, two of which are within the Cotswold DC area, that the applicants consider to have created a precedent (Batsford Arboretum and the Hare and Hounds, Westonbirt).

10.6 The application site is located outside any Development Boundary as designated in the Cotswold District Local Plan 2011-2031. Development in such locations is primarily covered by Policy DS4: Open Market Housing Outside Principal and Non-Principal Settlements, which states that 'New-build open market housing will not be permitted outside Principal and Non-Principal Settlements unless it is in accordance with other policies that expressly deal with residential development in such locations.'

10.7 The Council has, therefore, sought independent advice regarding this matter, which is summarised below.

Amongst the exceptions listed is housing for rural workers, Policy H5, which requires the following: -

'Outside settlements, new dwellings for rural workers will be permitted where:

- (a) it is demonstrated that there is an essential need for a worker to live permanently at or near their place of occupation in the countryside;
- (b) a financial test is submitted to demonstrate the viability of the business proposed or as proposed to be expanded;
- (c) a new dwelling cannot be provided by adapting an existing building on the holding;
- (d) a suitable alternative dwelling to meet the essential need is not available on a defined development site within the 17 Principal Settlements or within a village or hamlet;
- (e) the proposed dwelling is located within or adjacent to the existing enterprise or other buildings on the holding;
- (f) the size of the proposed dwelling is proportionate to its essential need; and
- (g) occupancy is limited by way of a planning condition or obligation.'

10.8 Paragraph 84 of the National Planning Policy Framework (NPPF) advises that 'Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

- (a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside.'

10.9 It should be noted that the applicant's agents contend that the above Policy and NPPF paragraph are not applicable to the consideration of the application. Their contention is that attention should be paid to paragraph 85 of the NPPF, which states 'Significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs'. The case made centres around the specific needs of the applicant's business in order to mitigate recruitment issues, stemming from a lack of local and affordable short-term accommodation. The type of accommodation provided may be required during the first weeks of employment, or perhaps in a probation period.

10.10 Daylesford Organic Ltd is sited at New Farm, Daylesford, which is understood to extend to c10,000 acres with 6000 acres in the district and 4000 acres in Staffordshire. From the information provided, there would appear to be approaching 400 people employed at Daylesford Farm and on New Farm itself, roughly divided as follows:

- Office - 50
- Retail (Shops) - 100
- Food & Beverage (Kitchen, Café, Restaurant) - 100
- Production (Bakery, Patisserie, Creamery) - 75
- Other service eg Spa - 25
- Farm Staff - 40

- 10.11 With this number, there would be expected to be a regular turnover of staff in various roles.
- 10.12 There are 7 cabins, each with 2 bedrooms, i.e. providing accommodation for up to 14 individuals at a time. The cabins provide a landing platform for entry level roles and are aimed in particular at staff who may have recently been recruited and need time to source accommodation locally or are on probation.
- 10.13 The employees generally enter into a 6-month accommodation contract, however there are understood to be one or two individuals who are living there for an extended period. Overall, this is seen by the applicants as a facility that enables a smoother recruitment process.
- 10.14 It is understood that the business owns a number of properties in settlements such as Chipping Norton, Oddington and Kingham, understood to be the equivalent of 78 bedrooms of accommodation. There are no details provided as to what the properties are, their location or indeed their tenure situation, i.e. their potential availability to the business.
- 10.15 The application is for the retention of the cabins for 2 years to enable Daylesford to find 'longer terms solutions'. Other solutions were referred to in 2019 but, as stated above, these did not come to fruition. It is considered that is very little detail or analysis accompanying the application to actually justify the retention of the cabins.
- 10.16 The cabins amount to isolated homes in the countryside, and although the occupiers will not in the main be 'rural workers' in the true sense, it would seem reasonable to adopt the test of 'essential need' as referred to in paragraph 84 in the NPPF considering their location.
- 10.17 From the information provided, it is considered that the ability to offer short term accommodation is important to the business since if this was not available recruitment at times might be challenging. Assuming that short term accommodation is important or even necessary, the other question to be addressed is how many rooms would be the minimum requirement over a given year?
- 10.18 When looking at available accommodation that is for sale in the locality, a 5-mile radius takes in Chipping Norton, Stow-on-the-Wold, Moreton-in-Marsh and Bourton-on-the-Water. There are considered to be properties that could, in theory, be purchased and made available for temporary accommodation, from one-bedroom flats to 3/4-bedroom houses that would lend themselves to multiple occupation. No information has been provided as part of the application submission as to whether this has been explored.

- 10.19 The comparable examples provided have been viewed. In brief, the Batsford Arboretum decision was a multi-faceted application and the three chalets provided replaced existing caravan accommodation. The other examples, including the Hare and Hounds at Westonbirt, are not considered compatible as these are associated with a 24/7 service and the resulting staffing dynamic and expectation would be different.
- 10.20 In conclusion, it is not considered that an essential need to retain the cabins has been established. Without any such justification for an essential need being demonstrated, the proposal is considered to be tantamount to the erection of 7 dwellings within the open countryside, contrary to national and local planning policies, i.e. Policies DS4 and H5 of the Local Plan, and paragraph 84 of the NPPF.

(b) Landscape impact within the Cotswold National Landscape

- 10.21 The site is located within the Cotswolds National Landscape (CNL) (formerly the Area of Outstanding Natural Beauty (AONB)). Section 245 of the Levelling-up and Regeneration Act 2023 states that 'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'
- 10.22 Policy EN2 of the Local Plan states that development will be permitted which accords with the Design Code (Appendix D). Proposals should be of a design quality that respects the character and distinctive appearance of the locality.
- 10.23 Policy EN4 of the Local Plan states that development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape (including the tranquillity of the countryside) of the Cotswold District or neighbouring areas. This policy requires that proposals will take account of landscape and historic landscape character, visual quality and local distinctiveness. They will be expected to enhance, restore and better manage the natural and historic landscape, and any significant landscape features and elements, including key views, settlement patterns and heritage assets.
- 10.24 Policy EN5 of the Local Plan states that in determining development proposals within the AONB or its setting, the conservation and enhancement of the natural beauty of the landscape, its character and special qualities will be given great weight.
- 10.25 Policy INF7 of the Local Plan states that development proposals must contribute, depending on their scale, use and location, to the protection and enhancement of existing Green infrastructure and/or the delivery of new Green Infrastructure. Green Infrastructure will be designed in accordance with principles set out in the Cotswold Design Code (Appendix D).
- 10.26 Paragraph 180 of the National Planning Policy Framework requires the planning system to recognise the intrinsic character and beauty of the countryside.
- 10.27 Paragraph 182 of the National Planning Policy Framework states that great weight should be given to conserving landscape and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty.

- 10.28 The site is located to the west of the Daylesford Farm complex and is within the CNL. The application is for the retrospective siting of 7 cabins for temporary staff accommodation for a period of 2 years with associated works. The cabins occupy a hollow surrounded by existing hedgerow and tree vegetation, trees are also present within the site. An area of hardstanding has been installed to provide access and level ground. An access road has been created that joins from the farm track to the north east of the site.
- 10.29 The application site and its surroundings are located within Landscape Character Type 17B Pastoral Lowland Vale: Vale of Moreton, as defined in the Cotswolds AONB Landscape Character Assessment. The Cotswolds AONB Strategy and Guidelines state that this character type has a strong rural character and may have the capacity to accommodate some development where this does not interfere with or detract from their landscape setting. The Strategy and Guidelines identify isolated development as a local force for change in this character type. The Potential Landscape implications of such development are stated as:
- Visual intrusions introduced to the landscape;
 - Erosion of the sparse settlement pattern of the Pastoral Lowland Vale;
 - Loss of characteristic open landscape;
 - Introduction of 'lit' elements to characteristically dark landscapes;
 - Upgrading of minor roads and lanes in areas of new development and introduction of suburbanising features such as gateways, kerbs, and lighting;
 - Loss of tranquillity;
 - Suburbanisation and domestication of agricultural landscape by the introduction of gardens e.g. ornamental garden plants and boundary features, parking areas, lighting, and conversion of tracks to manicured drives and ornamental gateways;
 - Appearance of 'mini parklands' out of context with the surrounding landscape; and
 - Damage to road verges and roadside hedges and walls and the creation of informal passing places.
- 10.30 The Strategy and Guidelines provide the following recommendations in relation to development such as that proposed:
- Avoid isolated development, that will intrude negatively into the landscape and cannot be successfully mitigated;
 - Conserve areas of dark skies;
 - Conserve the distinctive rural and dispersed settlement pattern;
 - Maintain the sense of openness and consider the impact of development, including cumulative development on views to and from the adjacent landscape types such as the Farmed Slopes and High Wold and on the setting of the AONB;
 - Control the proliferation of suburban building styles and materials; and
 - Introduce vehicle weight restrictions to prevent damage to verges and roadside boundaries.
- 10.31 To service the cabins, a new access road has been created, this has pushed development out into the rural landscape. The cabins themselves appear as isolated development that is separated from the main farm complex. Isolated development such as this influences the rural character and weakens a dispersed settlement pattern.

The cabins themselves have an industrial aesthetic and this, combined with a gravel and concrete yard, has an urbanising effect on the area. This urbanising effect is enhanced by domestic clutter such as outside furniture, bins and bikes.

- 10.32 One of the key characteristics and special qualities of the CNL is that of intrinsically dark skies. The Campaign to Protect Rural England (CPRE) has published 'tranquillity maps' which indicate that the neighbouring farm complex already generates a significant level of light which impacts upon an area which is primarily dark.
- 10.33 The Cotswold Conservation Board Position Statement (CCB 2010) notes at paragraph 19 that: -
- "The Board will oppose any development proposals which will lead to a significant increase in noise pollution, light pollution or other loss of tranquillity, either individually or cumulatively, particularly within areas identified as being most tranquil or dark...".
- 10.34 The proposed scheme introduces light spill from the cabin windows and light from exterior light fittings. These elements are visually intrusive and extend the lighting impact from the farm complex further out into the rural countryside. It is considered that the increased lighting would have a cumulative impact with the light already generated from the existing farm complex.
- 10.35 The site is sensitive to change by virtue of its location within the CNL and its connection with the wider rural landscape. The site in this instance is detached from the main farm complex and constitutes additional built form in this rural landscape. There are also concerns about the cumulative erosion of the dark skies in this location due to light spill and external lighting.
- 10.36 Whilst the Landscape Officer has commented that the additional landscaping proposed, and the fact that the application is for a temporary 2-year period, may mitigate the impact, it should also be noted that the previous refusal of planning permission related to the retention of the cabins for a temporary 3-year period. These comments are noted, however considering the expansion of the site outside the main complex of buildings, your Officers consider that the development that has been carried out is not acceptable either on a permanent or a temporary basis.
- 10.37 It should also be noted that in view of the previous refusal of planning permission on landscape grounds (refusal reason 2 above), if this matter could have been addressed through the imposition of a condition requiring additional landscape planting, then that would have been the course of action by the Local Planning Authority at that time, and no reason for refusal on landscape grounds would have been recommended. However, the objection is such that additional planting alone is not sufficient to overcome the harm identified.
- 10.38 In summary, the scheme is considered to have a detrimental cumulative impact on the rural landscape character of the CNL, contrary to the NPPF and Policies EN2 and EN5 of the Local Plan.

11. Conclusion:

- 11.1 The proposal is considered to conflict with the Development Plan and national policy included within the NPPF, which are not outweighed by other material planning considerations.
- 11.2 The recommendation is for planning permission to be refused.

12. Reasons for Refusal:

1. The application site is located outside any Principal or Non-Principal Settlement designated in the Cotswold District Local Plan. The site is also located in an isolated location in the open countryside which is remote from services, facilities, amenities and public transport links. The site does not represent a sustainable location for new residential development unless it can be shown that there are special circumstances such as the essential need for worker(s) to live permanently at or near their place of work. In this instance it has not been demonstrated that there is an essential need for the 7 cabins containing 14 bedrooms of residential accommodation to be provided on the site. It is therefore considered that the proposed development would be contrary to Cotswold District Local Plan Policies DS4 and H5 and guidance contained in the National Planning Policy Framework, in particular paragraph 84.

2. The application site is located within the Cotswolds National Landscape (CNL), wherein the Local Planning Authority is statutorily required to have regard to the purpose of conserving and enhancing the natural beauty of the landscape. The proposed development, by virtue of its location within the rural landscape and the cumulative impact caused by this scheme and the existing farm complex on landscape character and dark skies will have a significant urbanising and cumulative impact on the CNL. It is considered that the proposal would fail to conserve or enhance the natural beauty and tranquillity of the CNL and would be contrary to Section 245 of the Levelling-up and Regeneration Act 2023, Cotswold District Local Plan Policies EN2, EN4 and EN5 and NPPF paragraphs 180 and 182.