



Appeal Decision

Site visit made on 29 October 2024

by R Cahalane BA(Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 04 February 2025

Appeal Ref: APP/Y9507/W/24/3347352

**Barrow Hill Farm, Barrowhill Farm Lane, Ramsdean, Petersfield,
Hampshire GU32 1RW**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Messrs Luff against the decision of South Downs National Park Authority.
 - The application Ref is SDNP/23/00200/FUL.
 - The development proposed is change of use of agricultural building to leisure, swimming pool and associated facilities and proposed outside tennis court to support existing holiday let business.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The appeal submission includes an amended block plan with refuse storage, and amended elevations to include external light fitting locations. I do not regard these amendments as involving a substantial difference or fundamental change to the application. Nor do I consider that accepting these amendments would lead to procedural unfairness to interested parties. I have therefore determined the appeal on the basis of these amendments.
3. A revised National Planning Policy Framework (the Framework) was issued on 12 December 2024. Guidance for Relevant Authorities on Seeking to Further the Purposes of Protected Landscapes was also published by the Government on 16 December 2024. In the specific circumstances of this appeal, there is no need to invite further comments on the above from the main parties.

Main Issues

4. The main issues are:
 - whether the scale and location of the proposed development is acceptable having regard to the spatial strategy of the development plan;
 - whether the proposal would conserve and enhance the landscape, natural beauty and tranquillity of the South Downs National Park; and
 - the effect on the South Downs International Dark Sky Reserve.

Reasons

Scale and location

Scale

5. The appeal site comprises an agricultural barn at the eastern end of a farm complex housing a number of barns and other buildings. The barn is surrounded by concrete hardstanding and there are further areas of hardstanding to the north and more immediately alongside the barn's eastern and southern elevations. The site lies in the open countryside and the South Downs National Park (SDNP), surrounded by undeveloped land.
6. In recent years, farm diversification has been introduced in the form of self-catered holiday accommodation on the wider holding. The National Park Authority (NPA) has permitted nine holiday lets¹ and three glamping pods², collectively known as Barrow Hill Barns and Homelands Farm, and flexible commercial uses in a barn³ at the west side of the farm complex. The permitted scheme for eight of the Barrow Hills Barns holiday lets included a swimming pool that was not implemented, as ultimately the provision of a pool at the outset before establishment of the holiday let business was seen as a risk by the appellants.
7. Policy SD25 of the South Downs Local Plan 2019 (SDLP) states that exceptionally, development will be permitted outside of settlement boundaries, where, amongst other things, it complies with relevant policies in this Local Plan and there is an essential need for a countryside location. Its supporting text advises in paragraph 7.10 that exceptions to the development strategy are set out in other policies, for example Policy SD23 (Sustainable Tourism).
8. Policy SD23 sets out, amongst other things, that proposals for visitor accommodation and recreation facilities will be permitted where it is demonstrated that ancillary facilities are not disproportionately large in relation to the rest of the visitor facilities. Where proposals such as the appeal scheme are located outside settlement policy boundaries, this policy requires the development to be closely associated with other attractions or established tourism uses.
9. It is put to me that the holiday lets in the control of the appellants can in total accommodate up to 46 guests. The current proposal is presented as a furtherment to the ongoing farm diversification to support the wider farm, and to address increased competition in the area and higher guest expectations.
10. It is anticipated that there will be one full-time member of staff on site and also visiting self-employed staff to carry out pre-booked treatments within the building. There will be a self-service coffee machine for guests and additional part-time staff will be contracted to work at the site as required, depending on demand for the facilities and other matters such as staff holidays.
11. I accept that it is not unusual for tourist accommodation to be provided with a swimming pool and associated facilities, and that the additional nearby holiday lets have been implemented and established successfully. The scale of the

¹ NPA Refs: SDNP/15/04644/FU; SDNP/22/02266/HOUS

² NPA Ref: SDNP/21/01238/FUL

³ NPA Ref: SDNP/23/00201/FUL

overall proposed facilities however cannot be reasonably described as being ancillary to the 12 holiday existing lets, even with up to 46 occupants.

12. Whilst utilising an existing building, the enclosed facilities would be of considerable size. The overall nature, scale and extent of facilities to be provided are more akin to what would be normally provided alongside a much larger holiday complex than what currently exists. The proposal is therefore disproportionately large relative to the existing scale of holiday accommodation. In this respect, an essential need for the proposal has not been demonstrated.

Location

13. SDLP Policy SD19 states, amongst other things, that development proposals will be permitted provided that they are located and designed to minimise the need to travel and promote the use of sustainable modes of transport.
14. SDLP Policy SD41 supports the conversion of redundant agricultural buildings outside of defined settlement boundaries, subject to criteria requiring, amongst other things, the location to be sufficiently well related to existing infrastructure, amenities and services. Its supporting text advises at paragraph 7.201 that many but not all agricultural or forestry buildings will be suitable for conversion. Buildings which are generally not suitable for conversion include those in isolated locations, or with poor access arrangements.
15. The SDLP does not provide a definition of "isolated", although the NPA describes the site and its surrounds as being isolated in terms of connection to the highway network and wider facilities and attractions. Whilst the site is at some distance from the nearest town of Petersfield and the main road network, the more immediate setting of the appeal site is not devoid of buildings, including holiday lets. The appeal proposal is to provide facilities for these holiday lets and the appellants, but not for wider public use. In this context, I do not consider the location of the proposal to be isolated.
16. The appeal site and nearby holiday accommodation is served by a narrow rural lane. Walking distances from the holiday units to the proposal site are short in terms of distance. I also accept that Hampshire County Council Highway Authority raised no objection in consultation if the proposed facilities are limited to use by the existing tourist facilities, as there would be no significant increase in vehicle movements to and from the site.
17. However, the lane contains dense hedges, no footways or street lighting and limited pedestrian refuge opportunities. This is therefore a restrictive environment to walk along. The appellant suggests that the pool and other facilities could be available for use between 8am to 9pm. Given the absence of public transport provision, this would likely lead to additional private car use during periods of darkness and inclement weather. Although guests could stop at the proposed facilities enroute to somewhere else or upon their return from exploring the National Park, this would not always be the case.
18. The proposal is therefore not closely associated with the established holiday accommodation. Whilst this situation may not have changed since the nearby holiday lets were approved, I have not been provided with the full policy context applicable at the time of their determination. This also does not alter the fact that the current proposed conversion of an agricultural building would

not minimise the need to travel or promote the use of sustainable modes of transport.

Conclusion on scale and location

19. For the above reasons, the overall proposed scale and location of the holiday let facilities goes beyond the scope of what is supported under the spatial strategy of the development plan, namely SDLP Policies SD19, SD23, SD25 and SD41. A condition restricting use of the proposed facilities to guests of the nearby holiday lets and the appellants would not mitigate this policy conflict.
20. The first reason for refusal refers to a significantly low level of parking given the scale and scope of the proposed facilities, and a lack of provision for refuse storage and collection and general servicing requirements. A row of parking spaces is indicated immediately to the south of the conversion proposal, including one accessible space, which I consider to be sufficient for the anticipated use by staff and guests of the existing holiday units.
21. The appeal submission includes a refuse collection point adjacent the existing vehicular access off Barrowhill Farm Lane. I am satisfied that this would provide sufficient refuse storage and collection for the proposal, which could have been secured by means of a suitably worded planning condition, had I been minded to allow the appeal.

Landscape and natural beauty of the South Downs National Park

22. The statutory purposes of National Parks are to conserve and enhance their natural beauty, wildlife and cultural heritage, and to promote opportunities for the understanding and enjoyment of those areas by the public. Section 245 of the Levelling-up and Regeneration Act 2023 amends the duty on relevant authorities in respect of their functions which affect land in National Parks, who now must “seek to further” their statutory purposes.
23. SDLP Policy SD4 states that development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that, amongst other things, the design, layout and scale conserves and enhances existing landscape character features which contribute to the distinctive character, pattern and evolution of the landscape. The Policy SD4 supporting text advises at paragraph 5.10 that proposals should be informed by the South Downs Integrated Landscape Character Assessment 2011 (SDILCA). Whilst supporting text does not have the force of policy and cannot trump it, it is nonetheless relevant to its interpretation and in this case, how the distinctiveness of the landscape can be identified.
24. The appeal site is within Landscape Character Area J2 (East Meon to Bury Greensand Terraces) as set out in the SDILCA. Its Integrated Key Characteristics are identified as including a diversity of field patterns and enclosure, and contrast provided between the more open arable fields and the intimacy and enclosure created by the sinuous bands of woodland. The above characteristics are experienced within the setting of the proposal.
25. The relevant SDLP Policy SD41 criteria to this main issue require: the original building to be worthy of conversion with regard to its current character, scale and condition, without the need for substantial reconstruction or significant extensions; and, no adverse impact on the character of the building and its setting, in particular its agricultural character. Buildings generally not suitable

for conversion, as advised by supporting paragraph 7.201, include buildings which have a negative landscape impact only justified in a National Park setting by their agricultural usage.

26. The agricultural barn building proposed for conversion is mainly open and is more enclosed on its western elevation adjacent the other agricultural buildings. It has a large span, but reads as a typical form of modern agricultural development. It therefore does not diverge from the rural character of the site and the surrounding landscape. Even if it would become redundant and deteriorate in physical form, its agricultural form and purpose could still be appreciated.
27. The officer report states that the barn building is not considered worthy of conversion as it has no architectural or historic interest. Whilst this is inevitably a subjective matter, such a threshold is stricter than the wording of the abovementioned relevant criteria of Policy SD41.
28. That being said, the long eastern elevation of the barn faces mainly open countryside, with some intervisibility between the proposal site and the cluster of holiday units set slightly downhill at a distance alongside the lane. The proposed barn conversion would include a large expanse of glazing on its east elevation, which is most exposed to the surrounding landscape. Open views of the proposal would be possible from the southeast along Barrowhill Farm Lane, with the building sited on higher ground level than the lane. The adjacent agricultural buildings are much less prominent behind the proposal when viewed along the lane to the southeast, and therefore do not mitigate the adverse visual impact of the proposal.
29. Supporting paragraph 7.204 to SDLP Policy 41 further advises that conversion should be achieved through minimal changes and retention of the existing structure and its characteristics. Whilst the proposal would retain the existing structure, any enclosure of the existing open elevations would go beyond what could be reasonably described as minimal changes. The converted building would appear as a stark, contemporary and prominent development of significant commercial scale, appearance and function, at odds with and detracting from the agricultural character of the barn and farm complex, and the rural and distinctive qualities of the surrounding landscape.
30. Some change to the character of rural buildings is inevitable when they are converted, and such change has already occurred to the buildings on the main holiday let site. However, the converted building is read to be in a clearly different location to the holiday accommodation in which it would serve, and would appear disproportionately large relative to the existing scale of holiday accommodation. This would further accentuate the harmful impact upon the landscape character and natural beauty of the SDNP.
31. I also accept that mixed commercial uses have already been approved at another barn on the western edge of the group of buildings⁴. This building is however of smaller size and of less prominence than the appeal building, and therefore does not justify the current proposal.
32. The hardstanding to the north of the building, where the tennis court is proposed, contained a sileage clamp at the time of my site visit. The

⁴ See footnote 3 above

hardstanding was also used to store bales, fencing and other agricultural equipment. There is also an earth mound along the east side of the proposed tennis court. It is unclear as to whether this would be retained. It is also likely that a tennis court in this location would require enclosure to be safely operated alongside the agricultural complex. No detailed hard or soft landscape details are before me. Based on the submitted evidence before me, I am not certain that the use of planning conditions at this stage to secure further details would avoid harm to the landscape and natural beauty of the SDNP.

Tranquillity of the South Downs National Park

33. SDLP Policy SD7 sets out that development proposals will only be permitted where they conserve and enhance relative tranquillity and should consider direct impacts from changes in the visual and aural environment, and indirect impacts remote from the proposal such as vehicular. Proposals in highly tranquil and intermediate tranquillity areas should conserve and enhance, and not cause harm to, relative tranquillity.
34. The Policy SD7 supporting text at paragraph 5.43 advises that tranquillity is considered to be a state of calm and quietude and is associated with a feeling of peace. It is a perceptual quality of the landscape, and is influenced by things that people can both see and hear in the landscape around them.
35. Supporting Paragraph 5.44 refers to the SDNP Tranquillity Study (2017). The officer report describes the appeal site as being within a highly tranquil area, whereas the Tranquillity Study score for the site and its immediate surrounds suggest that it is within an intermediate tranquillity area. Given the site's location near other buildings and lanes, I consider that the Tranquillity Study score forms a more accurate reflection of the site and its surrounds.
36. The proposed parking area would be sited within the existing hardstanding area immediately south of the barn conversion, and could replace previous farm vehicles parked or stored here. However, the visual impact of the barn conversion, notably its exposed eastern glazed elevation and its associated use, would fail to conserve the relative tranquillity of the site's setting within the SDNP. Whilst the likely increase in vehicle use between the appeal proposal and the holiday lets would be minor relative to the existing use of the wider road network, it would nonetheless also fail to conserve relative tranquillity.

Conclusion - landscape, natural beauty and tranquillity

37. The overall appeal proposal is contrary to Policies SD4, SD5, SD7 and SD41 of the SDLP, the relevant criteria of which I have identified above.

South Downs International Dark Sky Reserve

38. SDLP Policy SD8 states that proposals will be permitted where they conserve and enhance the intrinsic quality of dark night skies and the integrity of the Dark Sky Core. Lighting which is proposed to be installed must meet or exceed the level of protection appropriate to the environmental zone. The proposal site is within the Dark Sky Core zone of the South Downs International Dark Sky Reserve, as shown on the SDLP Policies Map.
39. The existing site is unlit apart from three internal lights underneath the ridge of the proposed barn conversion. The proposed barn conversion includes no rooflights, but would provide a large expanse of glazing along the eastern

elevation to serve the length of the pool, the coffee area, the gym room and associated locker areas.

40. The appeal submission includes external illumination details, which would be limited to the installation of two downward-pointing wall lights either side of the proposed barn conversion main entrance on the southern elevation. These lights would only illuminate when motion is detected outside the building. Blackout blinds are proposed for all glazing within the building. The fixed glazing units would use internal recessed blackout roller blinds. The entrance doors and emergency exits would use a motorised integral blind system, and both systems would be activated via a photocell.
41. Full lighting specification and mitigation details could be provided by means of suitably worded planning conditions. However, the roller blinds may prove inadequate for the gym room and the changing and locker areas. These areas are served by windows on the exposed eastern elevation and may require opening to provide adequate ventilation, even during periods of darkness. This would prevent the intended operation of the roller blinds.
42. Whilst the appellant has made a genuine attempt to alleviate the impacts of light spill, based on the submitted evidence I am not certain that the proposal would conserve and enhance the integrity of the Dark Sky Core within the South Downs International Dark Sky Reserve. It has therefore not been demonstrated that the proposal would comply with the requirements of Policy SD8 of the SDLP.

Planning Balance

43. The proposal partially complies with SDLP Policy SD23, as it would make use of an existing building and would support a year-round visitor economy. Paragraph 88 of the Framework states that planning decisions should enable the sustainable growth and expansion of all types of business in rural areas, including through conversion of existing buildings, the development and diversification of agricultural and other land-based rural businesses, and sustainable rural tourism and leisure developments which respect the character of the countryside.
44. I have however found significant overall conflict with SDLP Policies SD4, SD5, SD8, SD19, SD23, SD25 and SD41. Paragraph 187 of the Framework states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and recognising the intrinsic character and beauty of the countryside. Paragraph 189 of the Framework sets out that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, which have the highest status of protection in relation to these issues. I therefore conclude that the proposal is contrary to the development plan as a whole.
45. The family of the appellants have farmed land in Ramsdean over many generations and still farm today. Successful farm diversification has been recently introduced and the holiday lets have now been operating for several years. The existing self-catering tourist accommodation operated by the appellants has been given the highest rating of 5 Star Gold by Visit England for accommodation. In response to guest feedback, the appeal proposal seeks to provide 5 Star Gold facilities for guests to improve their experience, and to also extend the holiday season and diversify the tourism offer in an increasingly

competitive market. The proposed facilities would raise visitor spend levels that would contribute more widely to the economy of the National Park. The above benefits are afforded moderate cumulative weight.

46. The Government's published guidance for relevant authorities on seeking to further the purposes of Protected Landscapes advises that if there is a conflict between the two statutory purposes of National Parks, as the relevant authority I must attach greater weight to the purpose of conserving and enhancing the natural beauty of the area in the National Park.
47. The appellants refer to other tourism and leisure facilities across England. However, there are insufficient specific details before me to make meaningful comparisons to the current proposal. The Parish Council has expressed support for the proposal, subject to the building being limited to guests of the existing holiday cottages and glamping pods. I must however assess the current proposal on its own merits having regard to all planning policy requirements and the site-specific circumstances.
48. The appellants contend that the proposal would lead to a significant reduction in farm traffic and heavy machinery noise both within the farmyard and in the local roads and fields, and that it would also pave the way for planting more wildflower meadows and hedgerows outside the curtilage of the proposal. The submitted evidence however suggests that the existing agricultural operation will continue, and I have found it likely that the proposal would generate additional private car trips. Therefore, the purported reduction in vehicular movements has not been demonstrated. The overall proposed landscaping details are limited and do not demonstrate that the adverse impacts I have identified would be mitigated.
49. It is also put to me that following further changes to the Town and Country Planning (General Permitted Development) (England) Order 2015 in May 2024⁵, the agricultural building subject of this appeal could now be converted to a gym, with further planning permission needed for the required external alterations to the barn. However, any change of use above 150 square metres would be subject to the prior approval procedure. Whilst this procedure is not as comprehensive as a full planning application assessment, it would nonetheless be subject to other material planning considerations that cannot be determined under this appeal. The potential for such a fallback has therefore not been demonstrated and is therefore only afforded very little weight.

Conclusion

50. The material considerations before me, including the Framework, do not indicate that a decision should be made otherwise than in accordance with the development plan. Therefore, the appeal is dismissed.

R Cahalane

INSPECTOR

⁵ The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2024