



Appeal Decision

Site visit made on 21 October 2025

by D Wildsmith BSc MSc CEng MICE FCIHT MRTPI

an Inspector appointed by the Secretary of State

Decision date: 05 November 2025

Appeal Ref: APP/Q1153/W/25/3365752

Sunnybrook Farm (Formerly - Park House Farm), Portgate, Road from Harris Arms to South View, Okehampton, Lewdown, Devon, EX20 4PZ

- 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 Wild House Ltd against the decision of West Devon Borough Council.
 - The application Ref is 1311/24/FUL.
 - The development proposed is the installation of 4no. glamping pods for overnight guest use, associated decking, reinforced grass track & parking / turning area, service hut, secure bicycle storage and recycling/refuse storage. Also intended is minor landscaping of the site, planting of native species trees, hedgerow, shrubbery and meadow grass with wildflowers throughout the site.
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Decision

1. The appeal is dismissed.

Main Issues

2. The main issues are:

- whether the proposed development would be in a suitable and sustainable location, with particular regard to access to services and facilities;
- the effect of the proposed development on the character and appearance of the surrounding area;
- the effect of the proposed development on biodiversity;
- whether the proposed development would be served by suitable surface water drainage arrangements; and
- whether the proposed development would deliver a comprehensive scheme of carbon reduction measures.

Reasons

Locational matters

3. In simple terms the appeal site comprises 2 more or less rectangular fields, joined together in an inverted 'L' shape and extending to about 1.0 hectare. These fields form part of the wider holding of Sunnybrook Farm, which is located adjacent to the hamlet of Portgate, about 3 kilometres (km) to the west of Lewdown and about 3.6km north-east of Lifton. As far as I could see at my site visit, Portgate comprises a small collection of somewhat scattered residential properties, offering no obvious facilities or services. The Sunnybrook Farm dwelling is located to the east of the appeal site, close to the Class C road which links Lewdown and Lifton, from where access to the appeal site would be taken. The main part of the appeal site is bounded by hedgerows and mature trees on its south-western, north-western and north-eastern sides, and has a significant downward slope from north-west to south-east.

4. I have noted the appellant's contention that the appeal site would be easily accessible by both bus and rail public transport and is located in close proximity to the National Cycle Network (NCN). As a result, the appellant maintains that these transport links support the sustainable operation of the site, and align with planning policy objectives that seek to reduce reliance on the private car. I acknowledge that bus stops serving eastbound and westbound services lie a reasonable walking distance of some 300 metres (m) to the west of the site entrance, and can be reached by means of a footway which runs along the southern side of the main road. However, the number and frequency of buses which these stops serve appears to be very limited.
5. Reference is made in the Council's evidence and in the appellant's 'Sustainable Travel Plan' (STP), to bus numbers 114, 117, 188 and 306, although at the time of my site visit only information for services 188 and 306 was displayed at the bus stops themselves. Service 306, running between Okehampton Railway Station and Launceston only provides 4 each-way buses on a daily basis, Monday to Saturday, with no services on Sundays or Bank Holidays; whilst services 114, 117 and 188, which link local villages, only run 1 return service each, on Thursdays, Tuesdays and Fridays respectively.
6. Moreover, the footway to the bus stops runs alongside a section of road which operates with the national speed limit of 60mph and has no street lighting. As a result it may not be particularly attractive to pedestrians, particularly in hours of darkness. In addition, whilst the westbound bus stop has a wooden bus shelter, the eastbound stop is unprotected. With all of these points in mind I consider that whilst it is correct to say that the appeal site could be accessed by public transport, the level of service available means that bus and rail services could, at best, only be of very limited practical benefit to tourists staying at the proposed glamping site.
7. The STP also makes reference to the fact that the appeal site is about 3km away from Route 327 of the NCN, which links to other NCN Routes such as 3, 27 and 304. Some further information on other cycle routes in West Devon is also provided in the STP, and I note that the appellant proposes to provide secure bicycle storage areas with charge points for electric bicycles. Having regard to these points, it is clear that the proposed glamping pods could cater for people on a cycling holiday within West Devon. However, no estimates of the likely use of the proposed development by cyclists has been provided, and because of this I find it difficult to attribute any significant weight to potential access to the appeal site by bicycle.
8. In addition to the above, the STP also makes reference to grocery delivery services, parking arrangements, electric vehicle (EV) charging point provision, e-bike storage and charging, and an on-demand electric vehicle shuttle service. It also states that staff will be 'sourced locally to reduce employee travel distances', and offered free EV charging for vehicles and e-bikes if they cycle to work; and that the use of public transport will be 'incentivised'. However, whilst the merits of such measures are self-evident, no firm details have been provided to explain how they would be secured and achieved. In particular, the STP contains no specific measures to reduce reliance on the private car, or targets for the reduction of journeys by the private car, nor is there any detail setting out actions to be taken in the event that journeys by car are not reduced.
9. Furthermore, the STP is not referenced in the draft Unilateral Undertaking submitted by the appellant, to which I refer again, later. On this basis, the STP could not be enforced and does not comply with those provisions of Policies DEV29¹ and DEV32² of the

¹ Policy DEV29: Specific provisions relating to transport

² Policy DEV32: Delivering low carbon development

Plymouth and South West Devon Joint Local Plan³ ('the JLP'), which seek to mitigate the environmental impacts of transport, maximise the use of sustainable modes of transport, and deliver a low carbon development.

10. I have noted the appellant's stated intention to provide what is described as comprehensive guest information on sustainable travel options, both during the booking process and within the welcome materials in every glamping pod, although with the exception of the public transport timetables appended to the STP and some limited cycle route detail, no meaningful examples of such information have been placed before me. In addition to the timetables, such information is stated to include cycling route maps, local taxi services, and walking guides.
11. But notwithstanding this intention, in my opinion it remains the case that although some journeys to and from the proposed glamping site could well involve non-car modes of travel, the overwhelming majority of trips are highly likely to be by private car. This would run counter to the Council's objectives of delivering sustainable development and a low carbon future as part of its spatial strategy, as set out in a variety of JLP policies, notably Policies SPT1⁴ and SPT2⁵. The proposal would also be at odds with policies which set out the development strategy for the 'Thriving Towns and Villages' tier of the spatial strategy, such as TTV1⁶, TTV2⁷ and TTV26⁸.
12. The last of these is particularly important as it is to be used to assess development outside built-up areas, as here. Amongst other things it makes it clear that isolated development in the countryside will be avoided and only permitted in exceptional circumstances, none of which apply in this case. Although the appellant argues that Sunnybrook Farm is neither isolated nor unsustainably located, the points set out above and my own observations at my site visit do not support that position.
13. With regards to other JLP policies, DEV15⁹ is generally supportive of business start-ups, small scale employment and the development and expansion of small business in rural areas, but any such proposals need to demonstrate no residual adverse impacts on neighbouring uses and the environment (discussed later), and also need to be sited in 'suitable locations'. Moreover, the policy indicates that it is only camping, caravan, chalet or similar facilities that respond to an identified local need that will be supported, subject to certain other listed matters; and that development proposals should avoid a significant increase in the number of trips requiring the private car and facilitate the use of sustainable transport, including walking and cycling, where appropriate.
14. In this case no identified need for additional tourism facilities in this locality has been put forward, and as noted above there is a very high likelihood that the private car would be the main form of transport for any future users of this proposed facility. Because of this, and the other reasons already given, I consider the appeal site to be an unsuitable and unsustainable location for a new development of this type.
15. The appellant also states that this proposed development forms part of a farm diversification strategy at Sunnybrook Farm, described as an active agricultural holding, with the proposed glamping pods intended to support the long-term sustainability of the farm business. However, as no further detailed information has been provided on this

³ Adopted in March 2019

⁴ Policy SPT1: Delivering sustainable development

⁵ Policy SPT2: Sustainable linked neighbourhoods and sustainable rural communities

⁶ Policy TTV1: Prioritising growth through a hierarchy of sustainable settlements

⁷ Policy TTV2: Delivering sustainable development in the Thriving Towns and Villages Policy Area

⁸ Policy TTV26: Development in the countryside

⁹ Policy DEV15: Supporting the rural economy

matter I do not consider that this somewhat bald statement can carry any meaningful weight in the proposal's favour.

16. Finally on this issue, I have noted that a number of other appeal decisions and planning applications have been referred to by both the Council and the appellant, with some supporting glamping and similar proposals and others opposing them. However, as full details of these various proposals have not been placed before me I am unable to say how they compare to the proposal before me which I have, in any case, considered on its own planning merits.
17. Drawing all the above points together I conclude that the proposed development could not be considered to be sited in a suitable and sustainable location, with particular regard to access to services and facilities. Accordingly I find it to be in conflict with the relevant requirements of JLP policies SPT1, SPT2, TTV1, TTV2, TTV26, DEV15, DEV29 and DEV32, as referred to previously.

Effect on character and appearance

18. The Council Officer's Report states that the appeal site is located within the open countryside of Landscape Character Type 5A, inland elevated undulating land, characterised as 'undulating upland farmland which is generally open and expansive with little built development'. Key sensitivities of this landscape include 'high levels of tranquillity and experience of dark skies'. Although the source document for these comments has not been provided to me, no party to the appeal has queried this matter, and I therefore take these points to be correct.
19. It is into this setting that the appellant seeks to introduce the proposed development. Vehicular access would be provided from the main road, firstly by means of the surfaced entrance which serves the Sunnybrook Farm dwelling, and then branching off through an automatic gate and by means of a track across the smaller field, which would rise up the contours and lead to the main field through a gap in the existing hedgerow. Although the submitted plans show this track to be reinforced grass, it appeared to be surfaced with a hoggin-type material at the time of my site visit.
20. The larger part of the appeal site measures about 155m in the north-west to south-east direction, and about 50m in the south-west to north-east direction. A small service area is proposed for the far north-western part of the site, to accommodate a reinforced grass parking area for 6 cars, including 2 EV charging points, together with a sloping-roofed service hut and a pent-roofed bicycle store. The service hut would measure 5m by 3m with a maximum height of 2.46m, whilst the bicycle store would measure 2.725m by 2.24m, rising to a ridge height of 2.075m. A new hedge running south-west to north-east across the site would separate this area from the rest of the field, where 4 glamping pods would be sited in a 'ladder-type' arrangement, down the field, linked to the vehicular access which would run more or less parallel to the site's eastern boundary.
21. Each pod would face south-east and would have decking on its south-eastern and north-eastern sides. There would also be a reinforced grass parking area to the north-east of each pod, with areas of meadow grass to each pod's south-east. Because of the steep gradient of the field the pods would be cut into the ground, with landscape mounds to their rears. All pods would be single-storey, at just over 3m high, and there would be 3 different sizes – 1 at 10m by 4.2m; 2 at 8m by 6m; and 1 at 6m by 3m. Pods would have full-height glazed doors on their south-eastern elevations, with the larger 2 sizes having glazed surrounds to these doors. The 3 larger pods would also have an additional window or windows on this elevation, with all pods having further windows on

their south-western and north-eastern elevations. The pods would be finished with larch cladding with Metrotile roofing in burnt umber, with UPVC fenestration.

22. Having regard to the above points, and in view of the elevated nature of the appeal site, I share the Council's view that the proposed development would introduce incongruous built form into what is currently an open, elevated and tranquil rural landscape. Moreover, the built development and atypical landform changes would be widely visible from the surrounding area, and would likely be accompanied by parked and moving vehicles and human activity. In my assessment there is also a strong likelihood that domestic-style paraphernalia such as outdoor seating, tables and sun-umbrellas could be placed on the decking and/or meadow grass areas by any future occupants, further exacerbating the harm to the current open and expansive landscape character.
23. I have noted the appellant's comments that native trees and hedgerows would be planted around the glamping pod areas to provide natural screening, habitat creation and long-term carbon capture, with areas adjacent to the pods and boundaries of the field being selectively rewilded. Nevertheless, I consider that the changed nature of the site and the increased activity and development it would accommodate would still be apparent, such that these measures would not outweigh the harm caused.
24. I acknowledge that the proposed external lighting for the site would be in the form of a small number of low-level, downward-shining bollards, but any occupants sitting outside late in the evening could introduce additional external lighting, while the pods' internal lighting would undoubtedly illuminate the windows, doors and glazed door-surrounds, further eroding the sense of remoteness and dark skies that contribute to the local character of this area. Moreover, whilst the appellant has indicated that clear noise and disturbance guidelines for guests would be implemented through a Noise Control Strategy, as detailed in the Design and Access Statement (DAS), it is unclear what any response time would be in this isolated location, if action needed to be taken to deal with noisy or disruptive guests.
25. I have had regard to the appellant's contention that the year-round use of the proposed glamping pods would result in a reduction in the scale, intensity and environmental impact of transient visitor accommodation on the site, when compared to the temporary campsite use of the land for up to 40 pitches which could operate for up to 60 days in any calendar year. Allowing for an 80% occupancy in the high season and a 60% occupancy in the low season the appellant estimates that the glamping pods would reduce overall guest travel by about 53%, compared to seasonal camping.
26. However, there is nothing in the submitted evidence to indicate that temporary camping has taken place on this land in the past. Indeed the relevant documentation and plan showing a seasonal camp site layout both appear to post-date the Council's refusal of planning permission for the glamping proposal. This is relevant as there is no firm evidence before me to indicate that 40 temporary camping plots, as shown on the aforementioned plan, are actually realistic on this heavily sloping site. Without such verification I can only treat these stated travel savings and environmental impact comparisons with caution.
27. But in any case, I share the Council's view that the fact that the site could be used for permitted seasonal camping does not provide any material weight in the appeal proposal's favour as any seasonal use would be transient, time-limited and impermanent. In contrast the appeal proposal would introduce permanent structures onto the site, with atypical landform changes and potential all year-round activity.

28. JLP Policy TTV26 requires, amongst other matters, that development proposals should help enhance the immediate setting of the site and include a management plan and exit strategy that demonstrates how long-term degradation of the landscape and natural environment will be avoided. For reasons already given above, the appeal proposal would conflict with this requirement. The proposed development would also be at odds with those parts of JLP Policies DEV15, DEV20 and DEV23 which seek to avoid incongruous or isolated new buildings; require new development to contribute positively to landscape; and conserve and enhance landscape character and avoid significant and adverse landscape or visual impacts.
29. Drawing together all the above points I conclude that the proposed development would have an adverse impact on the character and appearance of the surrounding area, and would therefore be in conflict with the JLP policies to which I have just referred.

Biodiversity

30. The planning application was submitted after 12 February 2024 and the proposed development is therefore required to demonstrate a biodiversity net gain (BNG) of at least 10%. The appellant has confirmed that it submitted a formal Biodiversity Metric 4.0 calculation in support of the application, prepared in accordance with the most recent statutory guidance. This included an assessment of strategic significance, based on the site's proximity to the Devon Nature Recovery Network (DNRN). The appellant further points out that the proposed creation of new habitat types, including neutral grassland, native scrub, and broadleaved woodland has been specifically designed to enhance ecological connectivity with the adjacent DNRN-designated area.
31. I have seen the comments made by the Council's Ecologist, dated 6 September 2024, which gave in-principle support to the proposed habitat creation works, but indicated that further information was required from the appellant's Consultant Ecologist. The Council's Ecologist was concerned that the habitats present at the ecological baseline were stated as having the lowest strategic significance score, whereas the created habitats were given the highest strategic significance score. He saw this as an inconsistency and asked for robust justification for this assessment to be provided, along with clarity as to which local strategy the newly created habitats would be part of. He further commented that if a consistent approach was taken for both pre and post-development habitats, with regards strategic significance, the scheme would actually lead to an onsite net loss in biodiversity of 0.10 units (-2.57%).
32. The appellant states that these comments were not uploaded to the public planning portal until 18 November 2024, shortly before the application was determined, and that it provided a detailed reply prepared by its Consultant Ecological the following day, but was advised that it had been received too late for consideration. The appellant further comments that the opportunity to engage directly with the Council's Ecologist in order to seek to address any concerns, was also refused.
33. In these circumstances I can appreciate the appellant's frustration, and have noted its suggestion that matters relating to the development satisfying the Council's BNG obligations could be secured through an appropriately worded planning condition attached to any grant of permission. It remains the case, however, that I have not seen the latest comments from the appellant's Consultant Ecologist on this matter, and do not know how the Council's Ecologist would respond to these points. I cannot therefore be certain that this matter could be satisfactorily addressed by the imposition of a condition, if I had been minded to allow this appeal. Put simply, I am required to determine this

appeal on the evidence before me, and for the reasons just explained I cannot be certain whether the appeal proposal would achieve the necessary BNG.

34. In these circumstances I therefore have to conclude that it has not been demonstrated that the proposed development would achieve at least a 10% BNG. Accordingly I cannot say whether or not the proposal would accord with the relevant provisions of JLP Policy DEV26, and the guidance contained within paragraph 187 of the National Planning Policy Framework ('the NPPF'), requiring new development to minimise the impact on and provide net gains for biodiversity.

Surface water drainage

35. A similar situation to that just described under the Biodiversity main issue also appears to have arisen with matters relating to surface water drainage. In summary, the appellant had submitted a surface water drainage scheme which incorporated soakaways to dispose of surface water, to which the Council's Drainage Engineer objected on the basis that insufficient information had been submitted to show that the soakaways would be a workable solution. To address these concerns, and substantiate the effectiveness of the drainage strategy, the appellant has indicated that it subsequently carried out successful percolation tests on the site which confirmed that soil conditions are suitable for the proposed soakaways and infiltration systems.
36. However, although the appellant indicated it was willing to submit the results of these percolation tests it does not appear that they were placed before the Council, nor have they been submitted as part of this appeal process. Because of this I have to conclude that insufficient evidence has been submitted to demonstrate that the proposed development would be supported by suitable surface water drainage arrangements. Accordingly I cannot be certain whether or not the appeal proposal would satisfy the relevant requirements of JLP Policy DEV35, which deals with managing flood risk and water quality impacts.

Carbon reduction

37. JLP Policy DEV32 sets out a number of provisions aimed at halving 2005 levels of carbon emissions by 2034 and increasing the use and production of decentralised energy throughout the Plymouth and South West Devon area. In addition, the Council has declared a climate and biodiversity emergency and has adopted a Climate Emergency Planning Statement¹⁰ (CEPS), requirement M1 of which seeks new development to achieve at least an equivalent 20% carbon saving through onsite renewable energy generation, in accordance with provision 5 of JLP Policy DEV32.
38. From the evidence submitted it is clear that the proposed development has had carbon reduction measures in mind, with the glamping pods themselves being compact and highly energy-efficient, with insulation designed to support comfortable year-round use. The proposal also includes the provision of EV charging points in the general parking area and for each pod, along with EV charging facilities for bicycles. The appellant's Statement of Case (SoC) and Final Comments also explain that air-source heat pumps would be provided at each pod, although this matter does not appear to have been previously referenced in either the planning application or the DAS, and it is therefore unclear how it would be secured. Moreover, the appellant's SoC and Final Comments indicate that a solar photovoltaic (PV) array with battery storage will be installed

¹⁰ Plymouth and South West Devon Climate Emergency Planning Statement – adopted November 2022

elsewhere on the site, although again this PV provision does not appear to feature in the planning application or the DAS. Accordingly it is unclear how it would be secured.

39. The appellant has also commented that all operational and maintenance vehicles, tools and equipment used on-site would be fully electric, and that there is to be a partnership arrangement with the Woodland Trust to plant new native trees, hedgerows and areas of managed scrubland on and around the development site. I consider these matters to be laudable, but as they do not appear to form part of the development proposal as submitted, there is no clear indication how they would be secured or enforced.
40. Further, I have noted the Council's comments that the measures proposed do not collectively constitute a 'comprehensive' carbon strategy for the development, and may indeed increase the physical impacts of the development within this countryside setting. The Council also states that there is no submitted evidence to demonstrate that the pods are designed to achieve meaningful energy performance targets, nor any assessment of embodied carbon, passive design or building lifecycle impact. I share these views.
41. Taken together, I have to conclude that it has not been demonstrated that the proposed development would deliver a comprehensive scheme of carbon reduction measures, as required by JLP Policy DEV32, and the Council's CEPS.

Other Matters

42. Living conditions. Concerns have been raised by residents at the adjacent property, 4 Torview, that the proposed development would result in negative impacts on the living conditions of these neighbouring residents through such matters as a loss of privacy, noise, disturbance, vehicle fumes, and smells. However, in light of the separation distance between the proposed development and the nearest residential dwellings, and the small number and size of glamping pods proposed, I share the Council's view that the appeal proposal would not give rise to a significant detrimental impact through noise, disturbance, smells or vehicle fumes. Moreover, the siting of the proposed pods and the dense boundary vegetation means that no material overlooking or loss of privacy would arise.
43. I have also noted the concerns that the proposed development could have an adverse impact on the safety of children in neighbouring gardens, but the appeal proposal would not grant rights of access to or over third party land, nor would it include the removal of boundary treatments that could facilitate unauthorised access to third party land. In light of these points I consider these safety concerns to be unfounded. With regard to the concerns raised regarding sewage disposal, I have noted that the Council's Environmental Health Team has considered the proposed development and has raised no objections. As the Council has commented, if the appeal proposal had been acceptable in all other respects, a satisfactory and sustainable foul water drainage system could have been secured by an appropriate planning condition.
44. Unilateral Undertaking (UU). The appellant has submitted a UU containing planning obligations covering such matters as Use and Occupation, Noise and Amenity, Sustainable Transport and Access, and Landscape and Biodiversity. However, this UU is only in a draft, unsigned and undated form. Had the appeal proposal been acceptable in all other respects, and had the UU been comprehensive, I could have allowed a short time for it to be signed and dated. However, not only have I found the appeal proposal to be in conflict with a number of JLP policies, it also seems to me that as submitted the UU does not cover all relevant matters as it makes no reference to the air-source heat

pumps, the solar PV array, or the on-demand electric vehicle shuttle service, none of which were referenced in the planning application. Planning obligations covering all of these matters could have been included in the UU. For these reasons I cannot give weight to this draft UU.

45. Job creation, economic and social benefits, and sustainable development. The appellant's SoC has sections dealing specifically with economic and social benefits. In economic terms the appellant has indicated that the operation and maintenance of the 4 glamping pods would provide several new local job opportunities and envisages up to 5 year-round positions covering such matters as site management, housekeeping, maintenance, and guest liaison roles. However, it is unclear whether these would be full-time or part-time positions, and no indication of likely salaries has been given. I acknowledge that if the appeal proposal was to proceed, future guests would assist the local economy by spending on services, businesses and facilities in the wider local area, and this would be a clear benefit of the proposal. But as this matter is unquantified, and would not be specific to the appeal proposal but would apply in respect of any tourism provision in more suitable and sustainable locations, I can give this matter only limited weight.
46. The appellant says very little with regard to social benefits, but I consider it relevant at this point to note that the NPPF highlights a social objective as one element of sustainable development, along with an economic objective and an environmental objective. For reasons just given it is clear that the proposed development would result in some economic benefits, but I am not persuaded that the NPPF's economic objective would be fully satisfied as the appeal site cannot be considered as being the right land in the right place. Similarly, as there is limited social infrastructure in the locality, and as the appeal proposal has not been shown to reflect a current tourism need in this area, I do not consider that the social objective is satisfied. Finally, for reasons detailed under the second main issue, the environmental objective is not satisfied. Accordingly, the appeal proposal cannot be regarded as sustainable development.

Conclusion

47. Drawing all the above points together, I have found against the appeal proposal on the first 2 main issues, and have concluded that it would be in conflict with several JLP policies. There is insufficient evidence before me for me to come to a firm view on the remaining main issues. I acknowledge that some economic benefits would arise from the proposed development, but in my assessment these would not outweigh the harm I have identified. On balance the proposal would not constitute sustainable development and my overall conclusion is that this appeal should not succeed.
48. I have had regard to all other matters raised, but find nothing sufficient to outweigh the considerations which have led me to conclude that this appeal should be dismissed.

D Wildsmith

INSPECTOR