



Appeal Decision

Site visit made on 4 November 2025

by Guy Davies BSc (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 13 January 2026

Appeal Ref: APP/Y9507/W/25/3361407

Compton Farmhouse, Church Lane, Compton, West Sussex PO18 9HB

- 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 Mr James Cooper against the decision of South Downs National Park Authority.
 - The application Ref is SDNP/24/03184/FUL.
 - The development proposed is the repair of a redundant farm workshop and the provision of one self-catering holiday unit on the first floor, reorganising and reusing the ground floor for the existing purposes - workshop, garaging and machinery store.
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Decision

1. The appeal is allowed and planning permission is granted for the repair of a redundant farm workshop and the provision of one self-catering holiday unit on the first floor, reorganising and reusing the ground floor for the existing purposes – workshop, garaging and machinery store at Compton Farmhouse, Church Lane, Compton, West Sussex PO18 9HB in accordance with the terms of the application Ref SDNP/24/03184/FUL and subject to the conditions in the attached schedule.

Preliminary Matters

2. Where development may have a significant adverse effect on a site designated under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), Regulation 63(3) requires the competent authority to consult the statutory nature conservation body, which in this case is Natural England. As that had not been done, I requested the Council to consult Natural England, and I have taken its response into account in reaching my decision.
3. A draft version of the National Planning Policy Framework was published on 16 December 2025 for consultation purposes. The draft may be subject to change dependent on the outcome of the consultation, and for that reason I place little weight on it for the purposes of this appeal.

Main Issues

4. The main issues are whether the development would:
 - accord with the spatial strategy of the Local Plan
 - preserve the settings of the grade II listed Compton Farmhouse and Barn and the grade II* listed Parish Church of St Mary, and preserve or enhance the character or appearance of the Compton Conservation Area
 - effect the ecological value of the Solent designated ecological sites

Reasons

Spatial strategy

5. Outside defined settlement boundaries, Policy SD41 of the Local Plan permits the conversion of redundant agricultural or forestry buildings subject to compliance with various criteria. The policy does not apply only to buildings which have historic merit or are of traditional appearance. Criterion e) makes that clear by accepting the conversion of buildings that are not of traditional appearance, so long as there are no redundant traditional buildings within the holding capable of being reused in the first instance. That is the case here, where all the traditional buildings on the holding have already been converted to holiday letting accommodation. Policy SD41 does therefore apply to the appeal building.
6. The criteria disputed by the Council appear to be *c) the building is worthy of conversion with regard to its current character, scale and condition, without the need for substantial reconstruction, significant extensions or ancillary buildings*, and *f) there is no adverse impact on the character of the building and its setting, in particular its agricultural/forestry character*. The Council also refers to the supporting text on the suitability of agricultural or forestry buildings for conversion and to the landscape impact of the conversion.
7. With regard to criterion c), the proposed conversion would replace the side and roof cladding but would not require any structural changes, and there would be no extension or need for ancillary buildings. While internal works would be required to create the holiday unit in a new first floor in the main range, I do not consider either that or the replacement of external cladding would amount to substantial reconstruction. Having regard to the supporting text, the building is not in an isolated location. While it may be outside the defined settlement boundary, it forms part of the group of buildings making up Compton Farm and the wider village and is viewed as such. The means of access is also satisfactory utilising the existing driveway which runs through the farmyard and is used by other holiday letting accommodation. It does not require the formation of any new access or trackway.
8. The question of whether the building is worthy of conversion is a more subjective judgement. I note the Council's view that the existing building is of poor quality and would prefer it to be removed to enhance the landscape, the conservation area and the settings of adjacent listed buildings. I also note that supporting text to Policy SD41 encourages the removal of disused buildings that have a negative landscape impact. However, the appeal building is in use and structurally sound and is therefore likely to remain in place indefinitely. Assessment of the effect of the proposed conversion must therefore be based on a comparison with the building as it exists now.
9. With regard to criterion f), while the building does not have the historic or aesthetic value as the more traditional farm buildings on the same holding, neither is it incongruous in a rural setting where barns of this nature are common features in the landscape. Its visual impact is further reduced by it forming part of a group of buildings and being on a levelled site that is cut into the natural slope of the land which rises up behind it. Its external cladding has aged, but in terms of its form and siting I consider it has a neutral impact on the landscape.
10. The conversion proposes to reclad the building with a zinc sheet roof and vertical timber boarding to the sides. Zinc sheeting is a material used on modern farm

buildings and is therefore characteristic of its original use. The vertical timber boarding would represent a visual improvement on the existing corrugated fibreglass sheeting. The conversion has been designed to screen new openings, in the case of side windows by setting them behind the cladding, and in the case of the end elevations by setting the glazing back inside the building. Some roof lights would be introduced in the main range and on the dropped lean-to roof but would be relatively small in comparison to the extent of the roof planes. All side elevations would remain uninterrupted other than for existing openings. Having regard to these design features, I consider that the building would largely retain its agricultural character and appearance, both in terms of its external materials and the largely unbroken elevations and roof planes.

11. I conclude that the proposed conversion would accord with Policy SD41 of the Local Plan. As that policy permits the conversion of redundant agricultural or forestry buildings outside of defined settlement boundaries, Policy SD25 relating to development strategy is not relevant. So far as Policy SD1 and the purposes of the National Park are concerned, I conclude that the proposed conversion would conserve the natural beauty of the area because the converted barn would have no greater impact on the landscape than the existing structure. It gains support from the second purpose of the National Park and Policy SD23 of the Local Plan because the holiday letting accommodation would provide an opportunity for visitors to understand and enjoy the special qualities of the Park.
12. Policy SD39 relates to new structures for agricultural or forestry and is not relevant to the proposed development as it is not a new structure, nor is it intended for agriculture or forestry.

Heritage assets

13. The appeal building lies adjacent to a number of listed buildings. The Barn at Compton Farm immediately to the west of the appeal building is a grade II former threshing barn in flint with brick dressings and a slate roof, now converted to holiday letting accommodation. The grade II Compton Farmhouse beyond it is of late Georgian style in flint with pale brick dressings and a slate roof. The special interest of these two buildings, along with outbuildings of a similar age and style to the barn, lies in their group value as an example of a traditional downland farmstead.
14. To the south of the appeal building and separated from it by a flint wall and hedge is the grade II* Parish Church of St Mary and its churchyard. Its significance and special interest lie in its history dating from the C13 or earlier although it was largely rebuilt in the mid C19, and its construction in flint with stone dressings under a clay tiled roof with short broach spire. It is characteristic of smaller downland churches. Its setting on the edge of the village consists of both open fields to the east and south, as well as buildings, including domestic dwellings, to the west and north.
15. The appeal building lies partly within the Compton Conservation Area. This conservation area covers the large majority of the village. Its significance lies in its historic origins as a small downland village, and the variety of buildings which exhibit locally distinctive materials including flint and brick with clay or slate tiled roofs.
16. The appeal building falls within the setting of the listed buildings at Compton Farm, both in terms of its function and proximity. It is seen in conjunction with the more

traditional farmstead buildings from a public right of way to the east, although views of it from Church Lane and within the farmyard are largely screened by the listed barn. Its southern elevation is also visible from the churchyard above the wall and hedge and therefore has an effect on the wider setting of the church. Its impact on the wider conservation area is limited to these views.

17. I note the Council's view that the appeal building has a negative effect on the settings of these heritage assets. However, it is already there and so my assessment of the proposed conversion is focused on what effect the changes to the building would have on the settings of the listed buildings and the conservation area.
18. In that regard I consider the conversion would largely retain the agricultural character and appearance of the appeal building for the reasons set out above. The roof sheeting would be typical of a modern agricultural building, with the timber boarding providing a modest improvement on the existing cladding. The design has sought to minimise the visual impact of new windows so as to maintain largely unbroken side and roof planes. Where glazing would be inserted at first floor level at either end of the building, it would be recessed behind the main elevations to reduce its visual prominence and minimise light reflection. The elevation facing the church would become somewhat more domestic as a result, but that change would be mitigated by the design approach taken. I do not consider that by itself would harm the significance of the church, the listed buildings in Compton Farm or the wider character and appearance of the conservation area.
19. One other aspect raised by the Council is the potential for light spill to erode the tranquillity and nighttime darkness of the area. Those elements are equally applicable to the landscape, but I have considered them as part of the significance of the heritage assets as that is how the Council has approached this matter in its reasons for refusal.
20. The design approach to the conversion in seeking to limit the visual impact of new window openings would also help limit light spill from those windows, because they would be screened behind the cladding or be recessed. The degree of light spill also needs to be compared to the existing building. The fibreglass side sheeting has weathered over time such that it has a similar appearance to the roof sheeting when viewed from outside. However, at night when lit from inside it is apparent that it is translucent, as shown in the photographs provided by the appellant. In comparison to the existing building, the proposed conversion would therefore have no greater impact on dark night skies and the sense of tranquillity, and may result in a reduction in overall lightspill.
21. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require that special regard is paid to the desirability of preserving the setting of the listed buildings, and preserving or enhancing the character or appearance of the conservation area respectively. I conclude that the proposal to convert the existing barn would not adversely affect how the adjacent listed buildings would be experienced or how their special interest would be appreciated, nor would it detract from the wider character and appearance of the area. It would consequently preserve those respective heritage assets.
22. For the same reasons, the development would not conflict with Policies SD12, SD13 and SD15 of the Local Plan, which seek to protect and enhance the historic

environment, listed buildings and conservation areas. Nor would it conflict with Policies SD7 and SD8 which relate to relative tranquillity and dark night skies.

23. Policies SD1, SD4 and SD5 also referenced in the Council's second reason for refusal relate to the purpose of the National Park, landscape character and design, which I address in my reasoning on the first issue.

Nutrient neutrality

24. Wastewater generated on the site drains eventually to the Solent, which includes areas designated as the Solent Maritime Special Area of Conservation, Chichester and Langstone Harbours Special Protection Area and Ramsar site under the Conservation of Habitats and Species Regulations 2017. Natural England has advised that these areas are in unfavourable condition as a result of excessive nutrients contained in water draining into it, including from wastewater treatment plants. As the development has the potential to generate additional wastewater, it is necessary for me to carry out an appropriate assessment to determine if it would contribute to the adverse effect of nutrients on the designated sites, and if so whether any effective mitigation measures could be taken to avoid such harm.
25. Although the proposed holiday letting accommodation would only generate a small amount of additional wastewater, the Habitats Regulations impose a precautionary approach on decision makers such that if a development cannot be shown not to cause harm to the designated areas, or for that harm to be mitigated, then it should not be allowed. When taken in combination with other development in the catchment that generates wastewater, I cannot rule out the possibility that further nutrient pollution may be caused by the proposal to the designated ecological sites.
26. Natural England advises that in order to avoid harm to the Solent areas, it needs to be demonstrated that the development would be neutral in terms of the nutrients it produces compared to its existing use. The appellant has submitted a nitrate budget statement purporting to do that, but it is incomplete because it does not include the calculations to explain the figures contained in the report. It also makes an assumption that the holiday let will achieve only a 45% occupancy rate.
27. The existing use of the barn is for a mixture of storage, garaging and workshop in association with the holding. As proposed those uses would continue, occupying largely the same floorspace, with in addition the holiday letting accommodation on the inserted first floor. On the face of it, that would appear to increase wastewater generation rather than replace one use with another. Without further details or explanation of the figures in the report I cannot be certain that they are robust or accurately represent the wastewater output of the proposed development. The reduction in runoff from hard surfacing would have no effect on wastewater as rainwater should not be entering the public foul sewer.
28. I also share the Council's concern at the 45% occupancy rate assumption. I see no good reason why the proposed accommodation would be any less desirable for holiday makers and would not achieve the 60-70% occupancy rates of other holiday lets.
29. However, as a final resort, the appellant says that there would be the option to purchase nitrate credits from schemes within and by the South Downs National Park Authority, and has confirmed that would be acceptable. Even if it were not possible to demonstrate that the development itself would be nutrient neutral, there

would therefore be a mechanism to secure mitigation to avoid harm to the integrity of the designated sites. I consider that such an approach would be consistent with the advice that the Council has drawn to my attention on achieving nutrient neutrality¹.

30. While it would not be appropriate for a condition to require the payment of money, the Planning Practice Guidance advises that it may be possible to use a negatively worded condition to prohibit development until a specified action has been taken. Regulation 70(2) of the Habitats Regulations provides that if the competent authority considers that any adverse effects on the integrity of the habitats sites would be avoided if permission were subject to conditions or limitations, it may grant permission subject to those conditions or limitations. I consider this to be a circumstance in which such a condition is appropriate.
31. I am satisfied that suitable mitigation could be secured by condition to ensure that there would be no harm to the integrity of the Solent ecological designated sites arising from the development. Subject to such a condition, the proposal would not conflict with Policies SD1, SD9, SD17 and SD54 of the South Downs Local Plan, which seek to protect ecological networks and the water environment from pollution.

Conditions

32. I have considered the conditions suggested by the Council against the tests set out in the Framework. The appellant has agreed in writing to the pre-commencement conditions, with the exception of a condition requiring further details of the conversion works. I have nevertheless decided to impose a simplified version of that condition and explain why below.
33. Conditions imposing a time limit and identifying the approved plans are necessary for certainty. A condition requiring approval of the external materials is necessary in the interests of the appearance of the building and its effect on the surrounding heritage assets and landscape.
34. A condition requiring approval of working drawings and a method statement for the conversion is necessary to ensure that the development is a conversion rather than a replacement of the existing building. I note the views of the appellant that the condition suggested by the Council is excessive and have simplified the wording to make it more proportionate to the proposed scheme.
35. Conditions are required to ensure that the use of the building is as intended and not as a separate residential or commercial use. A condition requiring recording of occupiers of the holiday accommodation is necessary to allow for monitoring and clarification of use if or when required.
36. A condition requiring a revised nutrient neutrality assessment, and if necessary compensating mitigation measures such as nitrate credits, is necessary to ensure that the development does not adversely affect sites designated under the Habitats Regulations.
37. I have not imposed conditions suggested by the Council restricting domestic permitted development rights. Paragraph 55 of the Framework says that planning conditions should not be used to restrict national permitted development rights

¹ Natural England: Advice on achieving nutrient neutrality for new development in the Solent region, version 5, June 2020

unless there is clear justification for doing so. No clear justification for doing so has been made out in this case.

Conclusion

38. I conclude that the development would accord with the development plan when taken as a whole and there are no material considerations that indicate a contrary decision otherwise. Consequently, I conclude that the appeal should be allowed.

Guy Davies

INSPECTOR

Schedule of conditions:

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans:
202104.Pap LP location plan June 2021
Existing elevations November 2023
Existing floor plan November 2023
Proposed elevations Revision May 2024
Proposed plans Revision May 2024
Roof plans August 2024
- 3) Notwithstanding any details shown on the approved plans, no development shall commence until a schedule of materials and finishes and samples of such materials to be used for external walls and roofs of the building have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved materials and finishes.
- 4) No development shall commence on site until working drawings and a method statement have been submitted to and approved in writing by the Local Planning Authority. The working drawings must be based upon a structural survey and show full details of the works necessary to enable the conversion to take place as well as structural details of methods of support and tying-in of walls and posts and works necessary to achieve foundation and underpinning. Once approved, the works shall only be carried out in accordance with the approved details.
- 5) The first floor of the building shall be used for holiday accommodation and for no other purpose (including any other purpose in Class C3 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.
- 6) Upon commencement of the use of the first floor of the building hereby permitted, the owner shall keep a record of all persons who have occupied the holiday accommodation including details of their stay. Such records shall be made available for inspection by the Local Planning Authority within 14 days of a written request from the Local Planning Authority.

- 7) The ground floor of the building shall be used solely for purposes incidental to the occupation and enjoyment of Compton Farmhouse as such and not for any trade or business purposes.
- 8) The development hereby permitted shall not commence until a revised nutrient neutrality assessment has been submitted to and approved in writing by the Local Planning Authority. The assessment must demonstrate that the development hereby permitted will be nutrient neutral or that compensating measures have been secured to ensure that any increase in nutrients arising from the development will be neutral overall. The measures specified in the approved assessment to ensure nutrient neutrality shall be implemented prior to occupation of the holiday letting accommodation hereby permitted.