

Agenda Item 8
Report PC26/18

Report to	Planning Committee
Date	10 May 2018
By	Director of Planning
Local Authority	Arun District Council
Application Number	SDNP/17/03717/FUL
Applicant	Mr Nigel Draffan
Application	<ol style="list-style-type: none"> 1) The Erection of three new agricultural buildings at Maggot Farm, comprising Grain Store; Sprayer, Fertiliser, Hay and Storage and Straw Barn; and Machinery Store, incorporating Farm Office and welfare facilities, together with associated hard standing and landscaping. 2) The residential conversion of existing traditional agricultural buildings to create a total of 7 dwellings at Blakehurst Farm. 3) The diversion of existing footpath to enable the creation of private amenity areas in association with above dwellings.
Address	Blakehurst Farm and Maggot Farm, Blakehurst Lane, Warningcamp, Arundel, West Sussex

Recommendation: That the application be refused, for the reasons set out in paragraph 10.1 of this report.

Executive Summary

The applicant seeks permission for the erection three new agricultural buildings at the Maggot Farm site, comprising a grain store; a storage barn for agricultural chemicals, hay and straw; and a machinery store, farm office and welfare facilities, with associated hard standing and landscaping, to create a new agricultural yard.

The application also seeks the residential conversion of three existing traditional agricultural buildings to create a total of 7 dwellings, at the Blakehurst Farm site. The conversion will also require the diversion of footpath 2218, to enable a single storey extension and the creation of private amenity areas. The diversion itself forms part of a separate, concurrent section 257 application, SDNP/17/05259/FTP (Agenda Item 9).

The application originally included the provision of two new build dwellings at Blakehurst Farm, and a new public car park near Maggot Farm, for use in association with the local public rights of way network, however due to concerns raised by officers in regard to new dwellings in the countryside, and the Environment Agency in regard to the potential for surface water run-off from the car park to contaminate the nearby bore-hole, both these elements have been removed from the application.

The main issues relevant to the determination of the application are considered to be:

- The agricultural justification for the new barns;
- The heritage impact of the residential conversion on the special character of the historic farmstead, including the barn buildings, and the setting of the Grade II listed farmhouse;

- Design, landscape and visual impact;
- Viability, optimum viable use and Affordable Housing;
- Impact on ecology;
- Highway safety and impact upon the PRow network;
- Dark night skies; and
- Drainage and the water environment.

In regard to the new farm buildings at the Maggot Farm site, a need has been identified for the farm holding to invest in a number of new agricultural buildings, given that the existing arrangement is unable to sufficiently accommodate grain storage, or storage of farm machinery to current standards. The proposal seeks to provide economic and practical benefits to the farm holding, which are stated by the applicant to be necessary for its continuance.

The three new structures would be utilitarian in design, however would replace existing, semi-derelict agricultural buildings, and be seen within a context of a working agricultural landscape. Additional planting is also proposed to reduce visual impact on the landscape. A significant amount of evidence has been provided by the applicant in support of the application, which includes an Agricultural Justification, and a Farm Plan, which outlines a vision and objectives for the holding, including the current proposal. Support for the agricultural need for the new farm buildings has also been provided by an independent agricultural consultant.

In regard to the residential conversion at the Blakehurst farm site, the traditional farm buildings are considered unfit for modern farming practices. The buildings have been identified as a redundant asset, and their conversion would provide the capital required to meet the investment costs of the new farm buildings. The large 1960s steel framed barn in the centre of the yard, currently used as to store, fertiliser and machinery, would need to be removed to allow the conversion, and provision made elsewhere on the site for equivalent agricultural buildings.

It is clear that the scheme would accrue a number of benefits that are in line with the First Purpose of the National Park; both in terms of the sustainability of the farm holding, which is engaged in a variety of environmental stewardship schemes, and the conservation of the traditional barns, which are unfit for modern farming practice. The conversion of the barns into seven units would also allow for the provision of a commuted Affordable Housing element. However, given the heritage, design and landscape concerns raised in regard to the conversion element, and the associated diversion of footpath No 2218, officers have recommended an on-balance refusal, for the reasons set out in paragraph 10.1 of this report. The decision by Members will therefore require consideration of the potential harm to the heritage assets and landscape character of the area, and whether this outweighs the merits of the scheme.

This application is being placed before Members because it raises unique policy considerations.

1. Site Description

- 1.1 The Blakehurst Farm and Maggot Farm sites are located within the Blakehurst Farm holding, a tenanted working farm let by the Angmering Estate, which forms the eastern half of the original Norfolk Estate, near Arundel in West Sussex. Both sites are relatively visible within the landscape due to the somewhat flat topography of the area, which falls within the Angmering & Clapham Wooded Estate Downland Landscape Character Area.
- 1.2 Both sites are accessed via Blakehurst Lane, a narrow, rural lane with a junction onto the A27 approximately 0.8km to the south. The closest settlements are Warningcamp village, approximately 1km to the west, and Arundel town, approximately 2.5km to the west.

Blakehurst Farm

- 1.3 Blakehurst Farm is currently operated by the Lock family, who lease the land from the Angmering Estate. The holding comprises 489 acres, of which 405 are used for arable purposes, with the remaining 84 acres given to grazing. There is also a livery on site, providing stabling for 20 horses. The entire farm has been engaged with a variety of environmental stewardship schemes since 2000, which provide agricultural subsidies until 2020 (detailed at Appendix A of the submitted Farm Plan).

- 1.4 The Blakehurst Farm site is identified in the Sussex Historic Landscape Characterisation (HLC) and was originally a dairy farm. It retains a number of 19th Century traditional flint and brick barns that are of a distinctive 'Norfolk Estate' design. There has been some debate throughout the application in regard to the significance of the buildings, and it is the view of the SDNPA that the buildings are curtilage listed, rather than non-designated heritage assets. The buildings are mainly used for low-level storage rather than active farming purposes, due to their size, restricted size of openings and general state of repair. A steel framed barn was erected in the centre of the farmyard in the 1960s, and is currently used to store grain, machinery, and fertiliser.
- 1.5 There are a small number of residential properties in the vicinity, the nearest being Blakehurst Farm House immediately north of the farmstead, which is Grade II Listed, Orchard Cottage, approximately 25m north of the farm house, and Blakehurst House which is sited approximately 40m to the south. A livery yard operates to the southern side of the farm buildings, which would be retained under the current proposal.
- 1.6 Footpath 2218, which links Blakehurst Lane to Warningcamp Village approximately 750m to the west, passes through the application site immediately south of the southernmost barn building. The footpath is currently impassable. The first 40m section of the footpath would be obstructed by the proposed a single storey extension and private amenity space associated with the conversion of the southernmost barn. A separate Section 257 application SDNP/17/05259/FTP to divert the foot path has been made to the Authority as part of the application process, however the impact of the diversion is a material consideration in the determination of this application.

Maggot Farm

- 1.7 Maggot Farm site is located approximately 0.7km to the north east of Blakehurst Farm, and comprises a redundant building and an area of hardstanding. The site has a historic and functional relationship with Blakehurst Farm, being previously used for wintering livestock and rearing maggots.
- 1.8 The site is accessed off Blakehurst Lane via a public bridleway 3740, which is relatively well used and connects with the wider public right of way network. The area of hardstanding around the buildings is currently for informal parking by users of the public right of way.

2. Relevant Planning History

- 2.1 The most recent planning history relating to Blakehurst Farm is as follows:
- SDNP/16/00771/PRE Erection of purpose designed agricultural buildings and conversion of existing buildings to residential - Advice given 21 April 2016.
 - Pre-application advice for the proposal in the form of a written report was provided to the applicant, with further advice being provided in January 2017. The advice considered the provision of new barns at Maggot Farm likely to be acceptable in principle. The residential conversion of the traditional barns to development could also be acceptable in principle, however concerns were raised in regard to the number of units proposed, as the focus should be the optimal viable use of the buildings rather than securing the revenue required to provide the new farm buildings. Officers advised that separate applications should therefore be made for these two elements.
 - W/4/05/ Change of use from permanent grassland to outdoor exercise sand school to be used solely by the horses in the existing stables adjacent to site. Approved 07 July 2005.
 - W/3/00/ Erection of pre-fabricated wooden stable block to include 12 stables and 3 stores Approved 8 August 2000.
 - W/2/00/ Refurbishment of annexe to habitable accommodation for short term holiday lets. Approved 7 April 2000.
 - W/1/00/L Application for Listed Building Consent for internal alteration to existing layout of accommodation within main house and refurbishment of annexe/wing to further habitable accommodation including two rooflights and one additional external door. Approved 20 March 2000.

- W/10/94/L Application for Listed Building Consent for 1) Underpinning of and repair to north wall (internally and externally). 2) Underpinning & repair to masonry columns of porch entrance 3) Demolish part of front boundary wall and rebuild to match existing adjacent. Approved 27 February 1995.
- W/8/94 Conversion of vacant farm buildings to livery stables Approved 08 February 1995.

3. Proposal

3.1 The proposal seeks planning permission for:

Maggot Farm

- Demolition of a group of 3 redundant and semi-derelict farm buildings and erection of 3 new agricultural buildings, comprising a grain store (885 sqm); a storage barn for agricultural chemicals, hay and straw (515 sqm); and a machinery store, farm office and welfare facilities (326 sqm), with associated hard standing and landscaping. The buildings would be arranged around a central courtyard, and would be secured by a lockable gate with security cameras.
- The welfare facilities will be sited in Building 3, and will comprise of an office/restroom, a separate shower room (as required by Health & Safety sprayer regulations), together with an additional separate room with WC and hand-wash basin.

Blakehurst Farm

- Conversion of the main Threshing Barn to provide four dwellings within the building, each with ground and first floors plus accommodation in roof space. The barn is a substantial flint structure built c1870 with brick dressings and piers, two full height threshing doors and narrow ventilation slots. The building incorporates alterations following a fire in the 1950s.
- Conversion of the Stable and Coach House/cart shed to provide a single dwelling. The barn is a single-storey flint-brick-and-tile building, also dating c1870 that has been subject to several phases of alterations, including truncation at the southern end on erection of the 1960s steel framed shed.
- Conversion of the Bullock Range, Cowhouse and Calf Pen to provide two three-bedroomed dwellings with a single storey, 4.5m wide extension on the southern elevation that would be shared between the two units. The barn is a single-storey gabled range of 10 bays, built in 1888-9 on the footprint of earlier structure, which has been used as a milking parlour and more recently for storage.
- The central courtyard area is proposed to be retained as a shared amenity space. A covered parking area is provided to the west of the courtyard, between the historic farmstead and the Grade II listed farmhouse. Map regression indicates an earlier, smaller building in this position.

Footpath Diversion

- A Section 257 application SDNP/17/05259/FTP to divert footpath No. 2218 has been made and is considered under item 9, however the impact of the diversion is a material consideration in the determination of this application.
- The application proposes to divert approximately 40m of the PRoW by re-positioning the legal line between 25-32m further to the south, around the proposed single storey extension and private amenity areas serving Units 2 and 3. The route would be extended by approximately 40m in total.

4. Consultations

4.1 **Dark Night Skies:** Comments.

- No intensive external lighting should be provided.
- Would suggest no roof lights be installed and number of houses reduced so that the overall increase isn't significantly higher than what's already there.
- Requests condition that no external lighting be installed at Maggot Farm without approval.

4.2 **Design Officer:** Objection.

- It is critical that the conversion take its cues from the existing form of the farm buildings.
- The proposal undermines the character/landscape character of the site because the farm buildings cannot now read as a whole, and are instead fragmented into multiple parts.
- Introducing domestic 'rear gardens' and 'landscaping' are not appropriate for this site.
- The scheme adopts overcomplicated fenestration and flat roof additions that are incongruous and not complementary to the main structure.
- The intended materials are not clear, and there is no reference to ecosystem services and sustainable building practices.

4.3 **Economic Development Officer:** Comments.

- Want to see the retention of sustainable vibrant rural communities, villages, farms and estates.
- Often, a farm will have to diversify or make application for change of use to ensure long term viability.
- Would be interesting to know how the proposal will support new or existing FTE jobs.
- Must be balanced with the environmental and planning policies and natural designations.

4.4 **Ecology:** No objection, subject to conditions.

4.5 **Environmental Health:** No objection, subject to conditions.

4.6 **Environment Agency:** No objection, subject to conditions.

4.7 **Highways:** No objection, subject to conditions, notwithstanding the amendments to the parking layout.

4.8 **Historic Buildings:** Objection.

- The buildings are curtilage listed.
- Much of the buildings' significance is derived from the assemblage as a whole and its contribution to a wider landscape.
- The proposed conversion will have a significant negative impact on the character of the buildings, and will be harmful to the character of the historic farm group and its contribution to the wider context, including the setting of the listed farmhouse.
- The gardens, new outbuildings, and landscaping combine to produce an over-domesticated context for the old farm buildings.
- Many of the problems seem to come from the number of units that are being proposed.
- The revised scheme goes some way to addressing these points but not far enough.

Threshing Barn

- The form of the buildings should dictate the number of units and the attempt to squeeze four units into the large threshing barn is not acceptable as this will result in the loss of any real sense of the original large volume, and internal floor and walls cut across the original threshing door openings.
- A conversion driven by the form of the building would probably result in a division into two units, each with one of the large threshing doors and an inserted floor emulating the now-lost lofts.

Stable and Coachhouse

- The reinstatement of the now-lost south end should follow the original more faithfully in plan and elevation, which will actually give the unit more space. The proposed contemporary extension should be removed from the proposal.

Cowshed

- Both principal elevations are subject to significant change but particularly the southern elevation, to which it is proposed to add both extensions and large dormers. Again, door canopies which are quite inappropriate on a barn conversion are proposed.
- The range is not big enough to take two units, as demonstrated by the need for the extensions and dormers.
- The need for an extension on the cowshed is evidence that it can only accommodate one unit.

4.9 **Landscape:** Objection.

- This farmstead contributes significantly to the local landscape character of the Angmering and Clapham Wooded Estate Downland Landscape Character Area and as a result it is highly sensitive to change.
- The proposals do not acknowledge the character of the traditional farmstead, and the value of the site is being lost rather than conserved and enhanced.
- There would be a significant erosion of the farmsteads character due to over-intensification and number of units proposed, the addition of features onto the buildings themselves and the suburbanisation of key spaces around them.
- The proposed parking block should be repositioned as an east range to the courtyard (i.e. where the previous scheme proposed new build dwellings), and all parking should be within the courtyard to avoid the need for domestication of the wider context.
- The extent of enclosure and private spaces erode the traditional, functional character of the farmstead.
- The curtilages and different materials proposed for the hard-landscaping represent an over-domestication of the site.
- Farmstead conversions require a simple, unfussy landscape-led approach and a respect of spaces between buildings and key routes through the farmstead.

Footpath diversion

- The footpath contributes to the historic character of the local landscape character, being marked on the 1st edition OS Maps, to the character of the farmstead, and provides opportunities for recreation.
- There is an opportunity to improve its use so more people can continue to experience and enjoy the countryside (Purpose 2).
- The footpath is critical to the character of the farmstead and its diversion fails to understand its importance of the footpath, and therefore not supported.
- The historic route through the farmstead contributes strongly to its character and significance, and contributes no less value in the National Park than a historic hedgerow or veteran tree.
- This diversion demonstrates the antithesis of the landscape-led approach advocated through the emerging local plan, where the scheme imposes a design upon the farmstead, rather than sensitively accounting for all characteristic elements of the farmstead.

4.10 **South Downs Ranger:** Comment.

- The current buildings are not suitable and the proposed re location to the Maggot Farm to purpose built buildings makes sense.
- The traditional farm buildings at Blakehurst Farm are locally distinctive and make an important contribution to the cultural heritage of the South Downs, so any alternative use should conserve their character and appearance.
- The external lighting needs to be carefully considered in terms of impact on bats.
- Nesting boxes should be included for Barn Owl, Swallows and House Martins.
- If the car park is to be formalised it would need to be maintained.
- The new farm buildings at Maggot farm could impact the public right of way in terms of public safety and wear and tear on the bridleway.

4.11 **South Downs Society:** Objection.

- The applicant is a bona fide agricultural operator and the potential benefits of demolishing the modern farm buildings and restoring the traditional farm buildings and cottages at Blakehurst Farm are recognised.
- It would be preferable if the traditional farm buildings at Blakehurst Farm could be retained in agricultural use or alternative commercial/employment use, or visitor accommodation.
- Sensitive conversion to residential may be appropriate but the new build element is not acceptable.

4.12 **Southern Water:** No objection.

4.13 **Tree Officer:** No objection.

4.14 **Warningcamp Parish Meeting:** Comment.

- The loss of historic buildings, and precedent of similar developments of this nature particularly the new buildings, encouraging further building with in the SDNP.
- Increased volume of traffic along Blakehurst Lane, which is already a 'rat run' caused by additional traffic.
- Site traffic should be restricted from driving through the traffic and Blakehurst Lane should be made more suitable for heavy vehicles on a temporary basis.
- Environmental concerns in regard to impact/disturbance of bats.

4.15 **WSSC Public Rights of Way:** No objection, subject to conditions.

- A short length of this footpath (approx. 35m), lies immediately to the west of the proposed development site and runs alongside an open drainage ditch. This ditch occasionally gives off a foul smell, possibly due to run-off from the existing farmyard / stable area of Blakehurst Farm discharging into it.
- In addition, the embankments have eroded, widening the ditch, and this combined with obstructing side vegetation, has led to a reduced footpath width.
- Should this development go ahead it is likely that footpath use will increase and PRoW would seek assurance from the developer that a review of the existing drainage is undertaken and improvement works are carried out to re-establish the full width of the footpath adjacent to the ditch.

5. Representations

5.1 4 neutral representations have been received, raising the following:

- There is an agricultural benefit in creating safer and more useable working areas.
- Offering housing to local people would be highly beneficial and positive, however the units will be unaffordable for first time buyers and those needing smaller properties.
- Provision should be made for affordable housing.
- The proposal sets a precedent for further development in the National Park.
- The connection between building development and the farm revitalisation will be forgotten.
- Proper tarmac passing places should be provided on Blakehurst Lane and in Warningcamp to avoid further erosion of verges.
- Construction traffic should not come through Warningcamp.

6. Planning Policy Context

6.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The relevant statutory development plan is the saved policies of the Arun District Local Plan (2003). The relevant policies are set out in section 7 below.

National Park Purposes

6.2 The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of their areas;
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is a conflict between these two purposes, conservation takes precedence. There is also a duty upon the Local Planning Authority to foster the economic and social wellbeing of the local community in pursuit of these purposes.

National Planning Policy Framework and Circular 2010

6.3 The National Planning Policy Framework is considered holistically although the following sections are of particular relevance to the applications:

- Section 1: Building a strong, competitive economy
- Section 3: Supporting a prosperous rural economy
- Section 4: Promoting sustainable transport
- Section 6: Delivering a wide choice of high quality homes
- Section 7: Requiring good design
- Section 11: Conserving and enhancing the historic environment

6.4 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was issued and came into effect on 27 March 2012, both of which confirm that National Parks have the highest status of landscape protection. Paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in national parks and that the conservation of wildlife and cultural heritage are important considerations and should be given great weight.

6.5 The development plan policies listed in Section 7 have been assessed for their compliance with the NPPF and are considered to be compliant with it.

Major Development

6.6 Paragraph 116 of the NPPF outlines that planning permission should be refused for major developments in designated areas (including national parks) except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- The need for the development, including in terms of any national considerations and the impact of permitting or refusing it, upon the local economy;
- The cost of, and scope for, development outside the designated area, or meeting the need for it in some other way; and
- Any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated.

6.7 In the first instance, the proposed development does not constitute major development for the purposes of paragraph 116 of the NPPF or policy SD3 (Major Development) of the South Downs Local Plan Pre-submission draft Local Plan (2017). In reaching this conclusion, regard has been given to the opinions of James Maurici QC and the recent judgement of the High Court in R (FH Green Ltd) v South Downs National Park.

The South Downs National Park Partnership Management Plan 2014-2019

6.8 The South Downs National Park Partnership Management Plan (SDPMP) (2014-2019) is a material consideration in the determination of planning applications, as outlined in national planning practice guidance, and has some weight. It outlines a vision and long term outcomes for the National Park. The following policies are relevant:

- 1: conserve and enhance natural beauty and special qualities of the landscape.
- 3: Protect and enhance tranquillity and dark night skies.
- 9: The significance of the historic environment is protected from harm.

- 10: Improve the management of heritage assets, particularly focusing on those that are 'at risk'.
- 13: Support the financial viability of farm businesses through appropriate infrastructure and diversification developments encouraging those that support sustainable farming.
- 15: Increase understanding of farming and of farmers as the custodians of many of the special qualities of the National Park.
- 28: Improve and maintain rights of way and access land.
- 50: Housing and other development should be closely matched to the social and economic needs to local people and should be of high design and energy efficiency standards.
- 55: Promote opportunities for diversified economic activity.

7. Planning Policy

7.1 The following saved policies of the Arun District Local Plan (2003) are relevant:

- GEN2: Built Up Area Boundary
- GEN3: Protection of the Countryside
- GEN7: The Form of New Development
- GEN9: Foul and Surface Water Drainage
- GEN12: Parking in New Development
- GEN15: Cycling and Walking
- GEN22: Buildings or Structures of Character
- GEN23: The Water Environment
- GEN33: Light Pollution
- DEV2: Conversion of Rural Buildings for Residential Uses
- DEV6: Agricultural Buildings
- DEV18: Affordable Housing Outside the Built up Area

The draft South Downs National Park Local Plan

7.2 The South Downs Local Plan: Pre-Submission Local Plan was published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for public consultation from 26 September to 21 November 2017. The next stage in the plan preparation will be the submission of the Local Plan for independent examination. It is anticipated that the Submission Version will be submitted at the end of April 2018.

7.3 The Pre-Submission Local Plan is a material consideration in accordance with paragraph 216 of the NPPF, which confirms that weight can be given to policies in emerging plans following publication. Based on the current stage of preparation, and given the relative age of the saved policies within the Arun District Local Plan (2003), the policies within the Pre-Submission Local Plan are currently afforded some weight. The relevant policies within the Pre-Submission Local Plan are:

- SD1 – Sustainable Development
- SD2 – Ecosystems Services
- SD5 – Design
- SD4 – Landscape Character
- SD7 – Relative Tranquillity
- SD8 – Dark Night Skies
- SD9 – Biodiversity and Geodiversity
- SD12 – Historic Environment
- SD13 – Listed Buildings
- SD16 – Archaeology
- SD17 – Protection of the Water Environment
- SD19 – Transport and Accessibility
- SD20 – Walking, Cycling and Equestrian Routes
- SD22 – Parking Provision
- SD23 – Sustainable Tourism

- SD25 – Development Strategy
- SD28 – Affordable Homes
- SD34 – Sustaining the Local Economy
- SD39 – Agriculture and Forestry
- SD41 – Conversion of Redundant Agricultural or Forestry Buildings

Statutory Requirements

- 7.4 The Planning (Listed Buildings and Conservation Areas) Act 1990 places a series of duties on planning authorities when determining applications for planning permission that may affect listed buildings or their setting.
- 7.5 Section 66 (1) states that ‘in considering whether to grant planning permission for development which affects a listed building or its setting the local planning authority ‘shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.’

8. Planning Assessment

- 8.1 The advice provided by officers at pre-application stage was to separate the two elements of the proposal i.e. the new farm buildings and the residential barn conversion. This is because there are no development policies that support the provision of an enabling or funding element within agricultural development schemes. The two elements have been retained in a single, holistic application as, from the perspective of the holding, the elements are inextricably linked, from financial and practical perspectives, such that the new farm buildings cannot be brought forward without the conversion, and vice versa.
- 8.2 Although consideration will be given in this report to the practical link between the new farm buildings and residential barn conversion, the two elements will be considered separately, as the new farm buildings cannot be used to lever or otherwise financially justify the residential conversion in planning terms. The emerging South Downs Local Plan states that that farm diversification should supplement the core farm enterprise, or provide a long-term sustainable income stream to the farm allowing the main business to withstand periods of sustained low returns. Given this definition, residential conversion of assets does not constitute farm diversification, however in this instance would supplement the farming business by providing the funds for the new farm buildings.
- 8.3 The main considerations to be determined as part of this application are:
- Principle of development;
 - Agricultural justification and the rural economy;
 - Viability, including optimum viable use;
 - Heritage;
 - Design, landscape and visual impact;
 - Access, parking, highway safety and impact upon the PROW network;
 - Ecology;
 - Impact on amenity of others;
 - Drainage and the water environment.

Principle of development

- 8.4 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental.
- 8.5 The overall proposal is considered to be capable of compliance with saved policy GEN2 of the Arun District Local Plan (2003) which supports sustainable development outside settlement policy boundaries that is consistent with other policies in the Local Plan, and saved policy GEN3, which supports development in the rural area that meets the operational needs of agriculture. Other Arun saved policies relevant to the principle of the proposal include DEV2: Conversion of Rural Buildings for Residential Uses and DEV6: Agricultural Buildings, which are considered below.

- 8.6 Three new agricultural buildings are proposed at the Maggot Farm site, comprising a grain store, a store for chemicals, straw and hay, and a machinery store, workshop, office and staff facilities. New farm buildings that are reasonably necessary for the purposes of agriculture and appropriate to their countryside location are supported in principle by saved policy DEV6. The new barns will also replace a cluster of three existing agricultural buildings, such that the principle of development on the site is already established.
- 8.7 The conversion of the traditional farm buildings at Blakehurst Farm is also supported in principle. DEV2 'Conversion of Rural Buildings for Residential Use' supports conversion of barns to residential use providing that the building is structurally sound, and capable of conversion without significant alteration or extension. Policy SD41 of the South Downs Pre-submission draft Local Plan (2017) 'Conversion of Redundant Agricultural or Forestry Buildings' carries some weight, and also supports the conversion of agricultural buildings outside of defined settlement boundaries, providing the location is sufficiently well related to existing infrastructure, amenities and services; the existing vehicular access is suitable in landscape terms for the use proposed; the original building is structurally sound and capable of conversion without the need for substantial reconstruction, and there is no adverse impact on the agricultural character of the building and its setting. With agricultural buildings that are identified as heritage assets, the proposal should incorporate the optimal viable use that will conserve and enhance their architectural and historic significance and setting. Wherever possible, essential utilities and other functional requirements should not harm significant internal or external fabric, which should be retained.
- 8.8 In summary, there is overarching policy support for the principle of the proposed scheme, both in terms of the new farm buildings that are reasonably necessary for the continuance of the farm business, and the conversion of the historic farm buildings. However the acceptability of the new agricultural yard will be dependent on other considerations, including landscape and ecology. The acceptability of the conversion element will be dependent on how far the scheme is able to demonstrate that it represents the optimal viable use for the buildings, does not harm their significant internal or external fabric, and is capable of preserving and enhancing the historic significance of Blakehurst Farm and its setting. These matters are considered in more detail below.

Agricultural justification and the rural economy

- 8.9 The applicant has submitted a Farm Plan setting out the vision for Blakehurst Farm, an audit of assets, and current and future objectives, and how the holding could enhance its delivery of Ecosystem Services within the National Park context through achieving these objectives, which include the current proposal. The plan provides supporting background information for the proposal, although does not provide a holistic view of the whole Estate and how it functions across all its activities.
- 8.10 The Plan states that the existing arrangements at Blakehurst Farm are eroding the financial sustainability of the holding. The holding is facing increased risks to the business from volatility of crop prices and the move to lower a subsidy farming model following the UK's decision to leave the EU, and the Plan's vision is for Blakehurst Farm to become a sustainable agricultural business through modernisation, which will allow the ongoing environmental stewardship of the land. The Plan concludes that the holding's current and predicted income cannot support the level of investment required, and that delivery of the identified objectives, and associated Ecosystem Services benefits, is dependent on the capital released through the conversion of the traditional buildings at Blakehurst Farm, which are identified as a redundant asset.
- 8.11 The applicant has also submitted an Agricultural Justification statement, which explains the practical need for the new agricultural yard. Currently, the three access points to Blakehurst Farm are tight, such that large lorries are unable to enter the yard. The southernmost access is also of varying ground levels, and farm traffic using the northernmost access affects the amenity of the Grade II listed farmhouse. The 1960s barn in the centre of the yard is not rodent and bird proof, so grain cannot be stored in it beyond 31 October. The crop is therefore not 'assured' and cannot be easily placed to a market, meaning that the business cannot secure the best price for it. The size of the barn is such that a drier

- cannot be accommodated, requiring inefficient double handling of grain, and only allows for one type of grain to be stored, which limits the farm's ability to grow a range of crops as required by the farm subsidy system. The new agricultural yard would provide a grain store capable of storing up to 1000 tonnes of crops, including more than one type of grain, and secure machinery and farm chemical storage, plus the benefits of a workshop, staff welfare facilities and more economical three phase electricity. The cost of providing these facilities has been estimated at £962K, however given the estimated additional revenue from the improved crop storage is only £19.5K pa, the necessary capital could only be provided by the release of assets, and residential conversion.
- 8.12 An independent rural assessment has been provided by Reading Agricultural Consultants (dated 31 January 2018), which concurs that there is a requirement for a modern grain storage and drying facility, and secure storage for chemicals, fertiliser and machinery, which are reasonably necessary for the purposes of agriculture, and given the current unsatisfactory arrangements. The assessment also concludes that as the tenants pay a current market rental, any significant increases to that amount to fund development would render the holding unviable, and the most cost-effective means of funding the new agricultural yard would be via the conversion of the traditional barns to residential accommodation.
- 8.13 In terms of policy support for the new agricultural yard, Paragraph 28 of the NPPF also supports the development and diversification of agricultural businesses. Policy SD39 'Agriculture and Policy' carries some weight, and supports proposals for new buildings or structures for the purposes of agriculture where there is an agricultural need for the development within the National Park and its scale is commensurate with that need; the buildings are in keeping with local character, and of a design that reflects the proposed agricultural use; and include planting to integrate the development into the landscape.
- 8.14 It is acknowledged that the landscape of the South Downs has been shaped by traditional farming over many generations, and the practice of farming continues to contribute to the landscape character, biodiversity and ecosystem services intrinsic to the National Park. Policy 13 of the SDPMP states the SDNPA's support for the financial viability of farm businesses through appropriate infrastructure and diversification developments, particularly those that will support sustainable farming. As noted in paragraph 8.2, it is important to consider the needs of the farm as a whole, and the justification for the proposal, and the practical and financial links between the new agricultural yard and the conversion element is acknowledged. Neither element can be undertaken by the holding in isolation. However, this link is not reflected in planning policy terms, and the two elements must therefore be considered independently of each other.

Viability, Optimal Viable Use and Affordable Housing

- 8.15 Saved Policy DEV17 of the Arun District Local Plan (2003) 'Affordable Housing' seeks the provision of affordable housing in developments of 25 or more units, or residential sites of 0.8ha or more. Policy SD28 of the Pre-submission (draft) South Downs Local Plan 'Affordable Homes' carries some weight as it approaches submission, and requires developments of 7 units to provide a minimum of 2 affordable homes, at least 1 of which should be a rented affordable tenure.
- 8.16 Viability information, including a Financial Justification and Site Viability Assessment (residual appraisal) prepared by the purchaser of the site, Clarendon Properties Ltd., has been provided by the applicant.
- 8.17 An independent viability assessment has also been provided by Bruton Knowles. This highlights that the holding is let by the Angmering Estate to the tenant farmer under the terms of an Agricultural Holdings Act (AHA) tenancy, which means that compensation would need to be paid to the tenant to vacate the site. The assessment also considers that sufficient incentive is provided in the significant repair costs for the existing buildings in the absence of development, and requirement for new farm buildings to support the future operation of the farm, such that no premium should be added to the value to the site to encourage its release for development.

- 8.18 The assessment confirms that a conversion to an alternative, non-residential use of the buildings would not be a viable development option. It also concludes that a development of seven units would be viable, and likely generate a Residual Land Value in excess of the Site Value, that could provide off-site Affordable Housing Contribution. A development of either four or five units would be unviable, and unable to contribute to the provision of Affordable Housing.
- 8.19 The applicant has advised that no other forms of funding have been sought for the proposal, such as a Rural Development Programme LEADER grant.
- 8.20 In conclusion, as indicated by the independent viability assessment, officers believe that a commuted sum for affordable housing could be sought from the current scheme. In the absence of a S106 to secure this contribution, a refusal is recommended.

Heritage

- 8.21 Section 66 of the Town and Country Planning (Listed Buildings and Conservation Area) Act (1990) states that 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.
- 8.22 The saved policies from the Arun District Plan (2003) that are relevant to the consideration of heritage impact include GEN22 'Buildings or Structures of Character'. Policies SD12 'Historic Environment' and SD41 'Conversion of Redundant Agricultural or Forestry Buildings' of the South Downs Pre-Submission draft Local Plan (2017) are also relevant. Policy SD12 carries some weight, and supports development proposals that enhance or better reveal the significance of heritage assets, and appropriately re-use redundant or under-used heritage assets with the optimal viable use, which secures their long-term conservation and enhancement, including of their setting. Policy SD41 supports the conversion of redundant agricultural buildings outside of defined settlement boundaries where the optimal viable use is proposed to conserve and enhance its architectural and historic significance and setting, essential utilities and other functional requirements do not harm any significant internal or external fabric, and the existing historic fabric and features of architectural or historic significance are retained. The building must also be structurally sound, not derelict and of an appropriate design and scale for conversion to the proposed new use, without the need for substantial reconstruction or significant extensions.
- 8.23 The applicant has submitted a Structural Appraisal demonstrating that the barns are structurally sound and capable of conversion. The remaining issues therefore relate to optimum viable use, the significance of the buildings and whether the extent of harm/wider public benefit the conversion on the character of the buildings themselves and their role in the wider historic landscape setting, and on the setting of the Grade II listed farmhouse.
- 8.24 A Heritage Impact Assessment and Design and Conversion Approach have been submitted in support of the proposed conversion, detailing the role of the individual buildings and their overall historic use, and provides an evidence base from which the historic significance of the site can be read, in accordance with paragraph 128 of the NPPF. The buildings are described in the West Sussex Historic Environment record entry as non-designated heritage assets, and have been referred to as such in pre-application advice previously given by the SDNPA. However, following consideration of the information provided by the applicant in support of the view that the buildings are non-designated heritage assets, the SDNPA considers that the buildings are curtilage listed.
- 8.25 According to Historic England Advice Note 10, the question as to whether farm outbuildings form part of the curtilage of the farmhouse 'in particular depends on the degree of physical separation and the distinction in use.' In this instance it is not possible to demonstrate a clear demarcation in visual and spatial terms between the listed farmhouse and the complex of 19th Century farm buildings as the rear wing of the farmhouse (built in 1825 and which forms part of the listed building) fronts onto part of the farmyard and faces the North gable end of the large threshing barn. Furthermore, three factors have to be taken into account in deciding whether a structure or object is within the curtilage of a listed building first

proposed in A-G ex rel Sutcliffe and Others v Calderdale BC [1983] as accepted by Debenhams Plc v Westminster CC [1987]:

- 1) The physical layout of the listed building and the structure;
- 2) Their ownership, both historically and at the date of listing; and
- 3) The use or function of the relevant buildings, again both historically and at the date of listing.

In this case:

- 1) All of the plans clearly show the complex of farm buildings are within the grounds of the listed farmhouse. There is therefore a functional link between the buildings. There is a wall defining the front garden of the farmhouse serving to enclose the garden rather than separate the farmhouse from the complex of farm buildings.
 - 2) It is understood that both now and in the past the buildings have been in the same ownership and have formed part of the same farm.
 - 3) At present the farm buildings remain in agricultural use, with the tenant farmer living in the farmhouse. It would appear that the farmhouse still functions as the headquarters of the farm business, evidenced as part of the site meeting was held in the farmhouse kitchen.
- 8.26 Should Members be minded to approve the application, a separate Listed Building application would be therefore required for the proposed works to the curtilage listed buildings.
- 8.27 The NPPF requires that weight must be given to the scale of harm to the significance of the asset. Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. In this instance, the Historic Buildings officer is of the view that the scale of harm is less than substantial.
- 8.28 Paragraph 134 also states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use'. Any harm caused by the conversion must therefore be considered against the public benefits of the proposal, of which one consideration is the optimum viable use of the buildings. In terms of public benefits, these are stated above in paragraphs 8.9-8.14 of this report, however relate to the overall scheme. The conversion in itself would provide market housing which would not be available for wider public enjoyment, although it is recognised that to be a public benefit the asset does not have to be publically available. Public good can be had from a private heritage asset that has been conserved. Indeed, a sensitive conversion, and removal of the 1960s farm building could confer visual benefit to the wider landscape setting and ensure the long term retention of the asset.
- 8.29 Turning to optimum viable use, Paragraph 131 of the NPPF states that in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Paragraph 55 of the NPPF also states that the provision of new isolated homes in the countryside should be avoided unless there are special circumstances such as where such development would represent the optimal viable use of a heritage asset, or where the development would re-use redundant or disused buildings and lead to an enhancement of the immediate setting.
- 8.30 National Planning Policy Guidance defines 'optimal viable use' as either the sole viable use of the asset, or, if there is a range of alternative viable uses, the use likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. There are two strands in determining this. The first is an economic assessment of potential uses of the buildings to justify whether the proposed residential use is the most appropriate to secure their future. The viability assessment provided by Bruton Knowles dated 20.04.2018 confirms at para 5.10 that an alternative use for the buildings would not provide a viable development option.

- 8.31 The second is the impact of the physical changes to the buildings to accommodate the new use. This is fundamental because proposals will only be acceptable where the important characteristics which make the building worthy of being conserved are retained. This can also include aspects of their setting. The character of the buildings, and the features and qualities which contribute to their heritage significance needs to be fully understood so that these may be conserved and enhanced in the resultant design. Where possible, the conversion of historic farm buildings should retain the agricultural character as far as possible, without extensions, and allow the buildings to inform the design and layout of the conversion.
- 8.32 The submitted information states that the traditional buildings are need of urgent investment and repair, and that the scheme will both ensure their long term preservation, and have a beneficial impact on the setting of the Grade II listed farmhouse. This is largely due to the removal of the modern buildings, re-instatement of the courtyard layout, and the retention of key architectural features, which will respect the historic agricultural character of the buildings. Whilst these aspects of the scheme are broadly positive, the Historic Buildings officer has objected to the proposals, which are considered to have a significant negative impact.
- 8.33 The scheme has been subject to detailed discussions between the applicant and officers, and subject to a number of amendments to try to address heritage concerns, including removal of extensions and dormers, and reinstatement of the original return on the Stable and Coach House (Unit 1). However the Historic Building Officer has retained an objection due to four units still being proposed within the threshing barn, which will result in the loss of any real sense of the original large volume, and internal floor and walls cutting across the original threshing door openings; and to the subdivision of the cowshed which retains a 30 sqm extension on the southern elevation of the cowshed to provide living room areas for both units. This number of units proposed, in particular the proposal to subdivide the threshing barn in to four units (Units 4-7), and the cowshed into two units (Units 2-3), is considered to be harmful to the integrity of the buildings. The proposed conversion is therefore considered to have a negative impact on the character of the buildings, and be harmful to the character of the historic farm group and its contribution to the wider context, including the setting of the listed farmhouse.

Design, Landscape, and Visual Impact

- 8.34 The main policies for consideration in terms of design and landscape include saved policies GEN7: The Form of New Development and DEV2: Conversion of Rural Buildings for Residential Uses. Policies SD4: Landscape Character, SD5: Design, and SD6: Safeguarding Views of the South Downs Pre-Submission draft Local Plan (2017) are also relevant.
- 8.35 Saved policy GEN7 states that new development should improve the visual amenities of the local area and make a positive contribution to the quality of the environment, especially in sensitive areas. DEV2 'Conversion of Rural Buildings for Residential Use' supports conversion of barns to residential use providing that the development would not have an adverse effect on the internal or external character and appearance of buildings of historic importance or their setting.
- 8.36 Policy SD4 'Landscape Character' of the Pre-submission draft South Downs Local Plan (2017) carries some weight, and supports development that is informed by landscape character, that conserves and enhances the existing landscape character features which contribute to the distinctive character, pattern and evolution of the landscape; and safeguards the experiential and amenity qualities of the landscape. Policy SD5 'Design' supports development that demonstrates landscape-led approach and respects the local character. Proposals should both integrate with, respect and sympathetically complement the landscape character and utilise architectural design which is appropriate and sympathetic to its setting. Proposals should also incorporate hard and soft landscape treatment which takes opportunities to connect to the wider landscape and enhance green infrastructure. Policy SD6 'Safeguarding Views' supports development that conserves and enhances views from publically accessible areas within, in to and out from settlements which contribute to

the viewers' enjoyment of the National Park, and views from public rights of way, open access land and other publically accessible areas.

- 8.37 In regard to the new agricultural yard at Maggot Farm, the design of the new buildings are utilitarian in form, which is considered appropriate to their agricultural function. The barns will be seen within the context of a working agricultural landscape, where development of this form and type is to be expected. The new buildings will replace a group of redundant barn structures, and will be arranged in a similar farmstead layout on the area of existing hardstanding. The proposed materials, consisting of reinforced fibre cement roof sheets (Anthracite), steel vertical sheeting (Olive Green), and concrete wall panels, are considered appropriate within the landscape setting, and will be further screened through the reinforcement of the existing soft landscaping and further native planting. In terms of both design and landscape impact, this element of the application is considered acceptable.
- 8.38 In regard to the conversion of the traditional buildings at Blakehurst Farm, objections have been received from the Design and Landscape Officers, due to the failure of the scheme to understand the character of the farmstead, and a significant number of negative effects upon the character of the farmstead as a result. The principle design concerns focus on the fragmentation of the site that would occur as a result of the conversion, the introduction of domestic rear gardens and proposed fenestration and flat roof additions that are incongruous and not complementary to the main structures. The main landscape concerns focus on the extent of proposed enclosures and private spaces, which erode the traditional, functional character of the farmstead, the intensification of development and number of units proposed, the addition of features onto the buildings themselves and the suburbanisation of key spaces around them.
- 8.39 There is also a landscape objection to the diversion of footpath No. 2218, as this is considered integral to the character of the farmstead. The footpath runs immediately south of the farmstead, and originally provided a link to Warningcamp Village approximately 750m to the west. The path is impassable at present. The first section of the footpath would be obstructed by the proposed extension and private amenity space associated with the conversion of the southernmost barn, and a separate Section 257 application SDNP/17/05259/FTP to divert the foot path has been made to the SDNPA as part of the application process and is considered at Item 9. The footpath is proposed to be diverted between 25-32m to the south, and will increase in length by approximately 40m.
- 8.40 The scheme has been subject to detailed discussions between the applicant and officers, and a number of amendments have been made to the proposal to try and overcome the design and landscape concerns, including the removal of dormers and extensions, the use of post and rail fencing, removal of planting within the central courtyard, and provision of parking within the main courtyard rather than in the wider site. However, as the number of units and footpath diversion are retained in the proposal, the landscape objection remains.
- 8.41 In summary, although the new agricultural yard is considered to be acceptable in terms of design and landscape impact, the proposed residential conversion of the traditional farm buildings is considered to negatively impact the rural landscape character of the area.

Ecology

- 8.42 Part 11 of the NPPF draws attention to the duty to protect the natural environment and to the opportunities for its enhancement. Paragraph 118 of the NPPF (2012) states that 'when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Paragraph 119 clarifies that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. A number of species, including bats are protected under the Habitats Directive 1992 and are often referred to as European Protected Species (EPS). The presence of EPS is a material consideration when a planning authority is considering a development proposal.

- 8.43 Saved policies GEN28 'Trees and Woodlands' and GEN29 'Nature Conservation across the District' of the Arun District Local Plan (2003) and policies SD9 'Biodiversity and Geodiversity' and SD11 'Trees, Woodland and Hedgerows' of the emerging Local Plan are also relevant.
- 8.44 Concerns have been raised by Warningcamp Parish Council in regard to the potential for the development to impact bats, and the submitted survey work indicates that all three traditional barns at the Blakehurst Farm site support solitary bat roosts, with a social bat roost within the large threshing barn. There is also a barn owl roost in the northernmost building at the Maggot Farm site, and the whole site supports nesting birds including swallows.
- 8.45 The County Ecologist has reviewed the submitted information and is satisfied that appropriate mitigation measures have been proposed whilst the works are being carried out, and within the development. These include the use of one way excluders, building works supervised by a licensed ecologist, interim bat boxes and a compensatory roosts to be provided within the roof spaces of the development. These measures may be secured through planning conditions.
- 8.46 The Tree Officer has no objection to the proposal due to there being no major significant impacts on trees anticipated.

Contamination, Drainage and the Water Environment

- 8.47 NPPF Paragraph 109 states that the planning system should prevent both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution. Policy SD17 'Protection of the Water Environment' carries some weight, and supports development within Groundwater Source Protection Zones provided there is no adverse impact on the quality of the groundwater source or risk to its ability to maintain a public water supply.
- 8.48 The Maggot Farm site falls within the inner zone (Zone 1) of the Warningcamp abstraction borehole. The Blakehurst Farm site falls within Zone 2 of the borehole. Zones 1 and 2 identify the catchment area where sources of potable water are at particular risk from polluting activities on or below the land surface.
- 8.49 An Environmental Risk Assessment has been provided for Maggot Farm detailing the treatment of foul water drainage, surface water run-off, sprayer washout and cleaning, and the storage of fertilizer, chemicals, oils and fuel, in accordance with Environment Agency, Health and Safety and Defra regulations. The Environment Agency considers that the proposal satisfactorily demonstrates that the risk to controlled waters has been understood and addressed through appropriate measures to prevent pollution, and has no objection subject to condition.
- 8.50 At Blakehurst Farm, the foul water drainage is proposed to connect to a site sewer that will terminate at a package treatment plant, subject to a permit being granted by the Environment Agency. Rainwater run-off is proposed to drain to a watercourse and soakaways, with paved areas proposed to be permeably surfaced, allowing infiltration to ground. The Environmental Health officer has no objection subject to conditions securing a site investigation to establish existing contaminant levels, and the provision of an associated risk assessment and remediation strategy.

Highways

- 8.51 In regard to the Maggot Farm site, the Highways Authority is satisfied that the proposal is unlikely to cause a highways safety concern, given that a single employee would be on site, traffic would be large, slow moving, and infrequent, and the road is lightly trafficked.
- 8.52 In regard to the Blakehurst Farm site, concerns have been raised in regard to the potential for increase of traffic movement that would negatively impact Blakehurst Lane, which is a narrow, rural lane. However, the Highways Authority do not consider that the development would give rise to any material effect on the local network that could be considered severe. The access arrangements are considered satisfactory in terms of width,

and allow manoeuvring of emergency and refuse vehicles. The revised parking scheme is also considered to be satisfactory.

Public Rights of Way

- 8.53 The Maggot Farm site is accessed from Blakehurst Lane via public bridleway 3740, which runs east to west, and continues past the site to connect with the wider public right of way network. The route is fairly well used by the public, and although no alterations are proposed, it is likely there would be an increase in vehicle movements during and following the development. The County Rights of Way team have considered the proposal in terms of public safety and wear and tear on the bridleway, and have no objection subject to a number of conditions securing public access at all times, and protection of the width and surfacing of the track.
- 8.54 The Blakehurst Farm site is immediately adjacent to Footpath No. 2218, which runs immediately south of the farmstead, and originally provided a link to Warningcamp Village approximately 750m to the west. The path is currently impassable. The first section of the footpath would be obstructed by the proposed extension and private amenity space associated with the conversion of the southernmost barn, and a separate Section 257 application SDNP/17/05259/FTP to divert the foot path has been made to the SDNPA as part of the application process. As a result of the informal consultation associated with this application, a number of concerns have been raised, relating to the width of the new section, the presence of structures and fences/boundaries along the proposed diversion, and the sharp right angled turn. There is also an in-principle landscape objection to the diversion of the footpath, due to its link to the historic farmstead, and the contribution that the footpath makes to the historic landscape character of the area. Although amendments have been made to the scheme to overcome the more minor issues, as the diversion is still retained in the scheme, and the landscape objection to this element therefore remains.

Dark night skies

- 8.55 Arun saved policies that are relevant to the consideration of design and landscape include GEN33: Dark Night Skies. Policy SD8: Dark Night Skies of the South Downs Pre-Submission draft Local Plan (2017) is also relevant.
- 8.56 The site falls within zone EI (a), or 'intrinsic rural darkness,' which although is not part of the dark skies core is nonetheless considered an important dark sky area.
- 8.57 The external lighting at Maggot Farm will comprise of low energy, low wattage PIR controlled security light where required. The grain store will also be fitted with low energy, timer controlled flood light on the south and west elevation, that would be used in winter months for farm work and great out loading. Details of the external lighting plan at both sites can be secured through condition.

Amenity of Others

- 8.58 The closest neighbouring properties to the Blakehurst Farm site are Blakehurst Farm House immediately north of the farmstead, which is Grade II Listed, Orchard Cottage, approximately 25m north of the farm house, and Blakehurst House which is sited approximately 40 to the south. Although the occupants would be affected by some noise disturbance on a temporary basis caused by construction traffic associated with the conversion works within Blakehurst Farm, this impact would be temporary.
- 8.59 The new residential development at Blakehurst Farm is not considered to result in a significant adverse impact upon the road network. Public footpath No. 2218, linking Blakehurst Lane to Warningcamp Village approximately 750m to the west, is currently impassable.
- 8.60 The amenity of Blakehurst Farm House is likely to be enhanced by the proposal, due to the removal of the 1960s barn and heavy farm traffic from the site.
- 8.61 At the Maggot Farm site, users of the public bridleway No. 3740, may be affected by some disturbance during works to construct the new farm buildings, with some increase in vehicle

activity. The impact of construction works would be temporary and could be controlled by condition.

9. Conclusion

9.1 It is considered that the agricultural need for the development has been sufficiently demonstrated, and that the benefits of the scheme in terms of the rural economy, and ongoing sustainability of the holding are clear. However, the proposed conversion would be harmful to the historic character of the traditional farm building and farmstead setting, which contributes significantly to the rural landscape character of the area, and the setting of the listed farmhouse. The traditional character of the farmstead would be negatively impacted by virtue of the number of units proposed, and over-intensification of residential use of the buildings, the addition of features onto the buildings themselves, the suburbanisation of key spaces around them, and the need to divert public footpath No. 2218 to accommodate an extension and private amenity space.

9.2 On balance, given the Heritage and Landscape objections to the conversion element of the traditional barns, the application is recommended for refusal.

10. Reason for Recommendation and Conditions

10.1 The application is recommended for refusal for the following reason:

1. The traditional character of the farmstead would be negatively impacted by virtue of the domestication and suburbanisation which erodes the farmstead character of the buildings, the extensions and domestic additions to the buildings, the suburbanisation of key spaces around them, and the need to divert public footpath No. 2218, which would adversely affect the landscape and heritage character of the farmstead. The proposal would not conserve or enhance the historic character of the traditional farm buildings, which are considered to be curtilage listed, or farmstead setting, which contributes to the rural landscape character of the area, or the setting of the listed farmhouse. The conversion does not of itself demonstrate any clear public benefits which could outweigh the identified harm. The proposal is therefore contrary to saved policies GEN2, GEN3, GEN7, GEN22 and DEV2 of the Arun District Local Plan (2003), policies SD4, SD5, SD12, SD13 and SD41 of the South Downs Pre-submission (Draft) Local Plan (2017), the first Purpose of the National Park and the NPPF (2012).
2. In the absence of a completed S106 Legal Agreement to secure a commuted affordable housing contribution, the proposal fails to satisfy policy SD43 of the South Downs Pre-submission (Draft) Local Plan (2017).

11. Crime and Disorder Implication

11.1 It is considered that the proposal does not raise any crime and disorder implications.

12. Human Rights Implications

12.1 This planning application has been considered in light of statute and case law and any interference with an individual's human rights is considered to be proportionate to the aims sought to be realised.

13. Equality Act 2010

13.1 Due regard has been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010.

14. Proactive Working

14.1 In reaching this decision the Local Planning Authority has worked with the applicant in a positive and proactive way, in line with the NPPF.

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Appendices I. Site Location Map
SDNPA Consultees Legal Services, Development Manager.
Background [All planning application plans, supporting documents, consultation and third party responses](#)
Documents [National Planning Policy Framework \(2012\)](#)
[Arun District Local Plan \(2003\)](#)
[South Downs Pre-submission Draft Local Plan \(2017\)](#)
[South Downs National Park Partnership Management Plan 2013](#)
[South Downs Integrated Landscape Character Assessment 2005 and 2011](#)

Appendix 2

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