

Application No: 25/00189LBC Listed Building Consent

Site: Creek Cottage, Lower Woodside, Lymington SO41 8AJ

Proposal: Conversion of two existing salt barns to residential; associated works (Application for Listed Building Consent)

Applicant: Mr D Stevenson

Case Officer: Natalie Walter

Parish: Lymington and Pennington Town Council

1. REASON FOR COMMITTEE CONSIDERATION

Contrary to Town Council view

2. POLICIES

Development Plan Designations

Listed Building
Flood Zone

Principal Development Plan Policies

DP2 General development principles
DP12 Flood risk
DP18 Design Principles
DP49 Re-use of buildings outside the Defined Villages
SP11 Climate change
SP16 The historic and built environment

Supplementary Planning Documents

Design Guide SPD

NPPF

Sec 12 - Achieving well-designed places
Sec 14 - Meeting the challenge of climate change, flooding and coastal change
Sec 16 - Conserving and enhancing the historic environment

3. MEMBER COMMENTS

None received

4. PARISH COUNCIL COMMENTS

Lymington and Pennington Town Council: Recommend Permission.
Town Council is in support of this application since it is the best way of ensuring that the salt barns continue to exist in perpetuity going forward.

5. CONSULTEES

Archaeologist: No objection subject to conditions.

- The buildings and site have been the subject of heritage recording and investigation conducted over the past years.
- Archaeological works to date have shown that the proposed development area has a high potential to contain in situ deposits and features associated with the construction, use and subsequent partial demolition of the 18th and 19th century salt boiling house and any associated features and structures. There is also the potential for evidence of activity prior to the construction of the boiling house.
- The proposed development will see new areas of impacts not previously investigated and/or recorded and as such has the potential to negatively impact any in situ archaeological deposits. Therefore, recommends that all ground works are archaeologically monitored, a watching brief.
- The proposed alterations to the barns are extensive and the fabric of the two barns is in poor condition. It is unclear how much of the current (original) historic fabric can be and will be retained. In both barns the current floors are to be removed, with the wooden floor in barn 1 replaced.
- Subject to the views of the NFNPA Building, Design and Conservation Officer, additional historic building recording may be appropriate before and/or during development due to the proposed alterations and the potential for access to and/or loss of historic fabric.

With the access to below floor deposits and loss of historic fabric when the floors are removed, it is recommended that floor removal and any subsequent excavations within the structures are also archaeologically monitored, a watching brief.

Building Design and Conservation Officer:

Support subject to conditions (following the receipt of amended plans)
(January 2026)

North Barn:

- The applicant is now proposing to retain more of the late 19th century wall following concerns over its loss which now include a brick finish floor level, a nib on the south-east elevation, and retention of a section between the dining room and entrance hall. It is considered that these elements will conserve our understanding and appreciation of this less significant wall that none-the-less contributes to the historic evolution of the building.
- The applicant is now proposing a full height element, approximately one third, in the centre of the historic barn that will permit a continued appreciation of the aisled barn form. This, along with the reduced number of openings, is welcomed and the revised design supported subject to conditions. It has been confirmed that the partition between the dining room and the main living space will be glazed, therefore concern over this element is withdrawn (subject to a details condition to include a cross-section of this element).

South Barn:

- The revised scheme overcomes concerns relating to openings and design, subject to conditions.

Conclusion:

- Heritage assets are an irreplaceable resource, as set out in paragraph 202 of the NPPF and should be conserved in a manner appropriate to their significance for the enjoyment of future generations.
- As noted within previous comments, the salt barns have been deteriorating over many years and are now considered vulnerable and at risk by the National Park Authority. Conversion of the barns will require extensive works to overcome structural and historic fabric defects, causing less than substantial harm. However, noting the planning history of the site and the applicants supporting statements, residential use does appear to be their optimum viable use. The team are supportive in principle of the adaptive reuse of these buildings that are considered both nationally and locally important heritage assets that positively contribute to the cultural heritage of the National Park.

Additional Comments on Structural Elements of Proposal (February 2026):

- Cross-section/ elevation details still required to understand how the structural supports will interact with the historic fabric and hold the load of the first floor accommodation.
- Repair specification appears absent from documents.
- Comments on measures required to increase flood resilience.

Council for British Archaeology: support the principle of the adaptive reuse of these buildings and commend the heritage-led approach taken by the application. Recommendations made to help ensure the proposals retain the significance of the barns wherever possible including in relation to the internal fabric, the internal walls and floors, fenestration and archaeological mitigation works.

6. REPRESENTATIONS

Hampshire Swifts: The buildings should have at least one swift brick per home, secured by condition.

Lymington Society: Supports the proposals put forward and glad to see these properties restored and brought back into use.

Friends of the New Forest: Object on the following grounds:

- The barns are of immense historical and industrial archaeological significance and their conversion to residential would result in the loss of this significance.
- The barns are a distinctive feature in the landscape of the salt marshes, which are in turn a distinctive feature of the National Park. The domestication of this part of the area with the creation of domestic curtilages would have a detrimental effect on the more natural landscape of the marshes.
- The barns are visible from public rights of way which surround them and there is concern that the occupants would seek to close or divert these rights of way.
- Contrary to policy in that it has not been demonstrated that alternative uses, that would be better suited to the buildings, have been considered.

One letter of objection on the grounds that:

- The essence of the serene area will be destroyed by allowing extra parking for cars and the current plans with a variety of windows and doors will diminish the character of the buildings.
- Agree with the comments made by the Conservation Officer.

7. RELEVANT HISTORY

Conversion of two existing salt barns to residential; associated works (25/00188FULL)- pending decision

Realignment of footpath/track; access alterations; installation of estate fencing; reinforcement to bank (15/00632) granted on 17 November 2015

Installation of sea defence wall; realignment of footpath/track; access alterations; 1-metre high fence and gates (15/00306) refused on 16 June 2015

South Building: Internal Alterations; Joists; Flooring; Refurbishment of Window; Replacement Doors; Staircase to New First Floor; 2 Roof Lights, Upgrade Blocking of Openings; Re-point Brickwork. Aisled Building: Single Storey Extension; Windows Repaired / Replaced; Form Doorways; Repoint Brickwork; Repair / Piece Existing Boarding; Internal Staircase; Mezzanine; Installation of Paved Area (Application for Listed Building Consent) (12/97779) granted on 23 October 2012

Change of use to B1 office (aisled barn) and ancillary parking and storage (south barn); external alterations and single-storey extension (Application to extend time limit to implement planning permission ref. 09/94329) (12/97441) granted on 21 June 2012

South Building: Internal Alterations; Joists; Flooring; Refurbishment of Window; Replacement Doors; Staircase to New First Floor; 2 Roof Lights, Upgrade Blocking of Openings; Re-point Brickwork. Aisled Building: Single Storey Extension; Windows Repaired / Replaced; Form Doorways; Repoint Brickwork; Repair / Piece Existing Boarding; Internal Staircase; Mezzanine; Installation of Paved Area (Application for Listed Building Consent) (09/94337) granted on 04 May 2010

Change of use to B1 office (aisled barn) and ancillary parking and storage (south barn); external alterations and single-storey extension (09/94329) granted on 01 October 2009

Conversion of buildings to form two units of living accommodation; external alterations to both; extension to aisled barn (06/90881) refused on 19 February 2007

8. ASSESSMENT

8.1 The application site comprises two Grade II listed brick buildings located adjacent to Moses Dock, a channel leading down to the Solent. The buildings lie to the east of Creek Cottage, a non-designated heritage asset. The buildings are currently disused other than for some storage purposes and have been deteriorating for a number of years.

8.2 The site lies outside of the defined New Forest villages and within the Lymington to Keyhaven Marshes Local Nature Reserve (LNR) and the eastern

part of the site lies within the following ecological designations: Special Protection Area (SPA); Ramsar; and Site of Special Scientific Interest (SSSI).

8.3 The site lies within Environment Agency Flood Zones 2 and 3 for fluvial and coastal flooding, with the buildings sited within Flood Zone 3 (high probability of flooding) in an area with flood defences.

8.4 In relation to public rights of way, Lymington and Pennington Footpath 75 runs from the northeast through the site past the two salt barns, then southeast away from the site. Lymington and Pennington Footpath 77 runs along the site access from Lower Woodside to a junction with Footpath 75. Lymington and Pennington Footpath 509 runs south from Footpath 75 past the eastern boundary of the site.

8.5 Listed Building Consent and planning permission are two separate regimes. For some proposed works both planning permission and Listed Building Consent will be needed and this is the case with the proposals relating to the salt barns associated with Creek Cottage. The assessment of an application for Listed Building Consent focuses on the impact of the proposed works on the special interest of the listed building.

Proposed Development

8.5 The application seeks listed building consent for conversion of the two existing salt barns into residential use with associated works. The conversion would create two separate, two-bedroom dwellings. A concurrent full planning application has been submitted for the same proposed works (application reference 25/00188FULL).

8.6 It is proposed to extend the northern barn on its north-eastern elevation together with a smaller extension on the south-western elevation. Following receipt of amendments, it is proposed to retain more of the late 19th century wall which include a brick finish floor level, a nib on the south-east elevation, and retention of a section between the dining room and entrance hall.

8.7 In respect of the internal floor space, a full height element is proposed in the centre of the barn; and the partition between the proposed dining room and living space would be glazed. Existing openings would be maintained with additional fenestration on each elevation, the addition of three rooflights on the south-eastern roof slope and an additional door on the south-eastern elevation.

8.8 Extensions are not proposed to the southern barn. The internal works would include a full height element. Two rooflights are proposed on the north-east elevation, a window at first floor on the south-east elevation and an amendment to the fenestration/ openings on the north-west elevation. There would be no changes to openings on the south-west elevation facing Moses Dock.

Planning Background

8.9 By way of background, the application has been submitted following a pre-application submission in 2022. The pre-application advice set out that the physical condition of the barns was of concern; that they are vulnerable and at risk; and that extensive works would be required in order to ensure their retention. It set

out the key relevant policy considerations and the policy position was summarised as:

"...the conversion of buildings to residential in the countryside is not generally acceptable, though their use as holiday accommodation may be supported. Any application along these lines would therefore need to demonstrate that there are no other viable and more appropriate, policy compliant, uses for the buildings and that the level of development proposed is the minimum required to secure their restoration and long-term conservation."

8.10 It then detailed other matters which would require consideration should an application be pursued following the receipt of the advice, including flood risk considerations.

Consideration

8.11 The key consideration in this Listed Building application is the impact of the proposal on the listed buildings and their setting.

8.12 Section 66 of the Planning (Listed Buildings and Conservation Areas) 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.

8.13 Comments received from the Authority's Building Design and Conservation Team set out that the salt barns at Creek Cottage are thought to be the last remaining built structures associated with the salt boiling industry of Lymington. The barns are considered to provide high evidential, historic, architectural, and communal value as possibly the only surviving buildings relating to Lymington's Salt industry, a rare survival in their national context too, and through illustrating past construction techniques using local, vernacular materials. The salt barns are considered to be prominent local landmarks and form an important part of the cultural heritage of the National Park (linked to the first statutory Park purpose).

8.14 It is noted that the salt barns have been deteriorating over many years and are now considered vulnerable and at risk.

8.15 Paragraph 202 of the NPPF sets out that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 210 states that in determining applications, local planning authorities should take account of:

(a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

(b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

(c) The desirability of new development making a positive contribution to local character and distinctiveness.

8.16 In addition, paragraph 221 of the NPPF sets out that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

8.17 Policy SP16 of the adopted Local Plan reflects NPPF policies and requires proposals to protect, maintain or enhance features of the historic and built environment and, where appropriate, help secure a sustainable future for those heritage assets at risk.

8.18 The principle of the change of use has been assessed in the corresponding full planning application. Conflict with planning policies has been identified and this has been weighed against the benefits of the proposal for enabling development, concluding that overall the benefits are not outweighed and planning permission should be refused.

8.19 Having regard to the specific impact of the proposal on the listed buildings and their setting, in respect of the proposed works to facilitate the proposed conversion of the barns and the extension of the northern barn, the applicant's design, access and heritage statement concludes that the overall impact of the proposed works to the barns will be significant but positive, and will therefore not have an adverse effect on the significance of the property or its surroundings.

8.20 The Authority's Building Design and Conservation Team note that conversion of the barns will require extensive works to overcome structural and historic fabric defects. Following two site meetings and a number of discussions with the applicant and their agent, amended plans were received which responded to concerns over the internal floor plans, openings and design. The adaptive reuse of the buildings is therefore supported in principle from a conservation perspective.

8.21 In relation to the proposed use of the barns, the applicant's planning statement sets out that the current proposal focuses on the preservation and security of the salt barns for the future. It references previous applications, such as office use, which have been found not to be viable. The proposed residential use is stated to be the most viable way forward. No specific up to date viability report is provided. However, reference is made to application 06/90881 which explored agricultural, office and residential options, although it should be noted that this application and viability report was 20 years ago. The planning statement acknowledges areas of compliance and non-compliance with policy and states that the current application has learnt from what has gone before as follows:

- 1) The alterations and repairs to the listed buildings to enable residential use are sympathetic and considered with the building and setting first in mind.
- 2) The previously approved office use has shown that other uses have been considered but are not as viable.
- 3) The flood risk is still Flood Zone 3 as before but extra steps have now been proposed that will make occupants safer.

8.22 Notwithstanding the lack of detailed viability information, the Authority's Building Design and Conservation Team set out that, noting the planning history of

the site and the applicant's supporting statements, residential use does appear to be their optimum viable use. Support from the Town Council, Georgian Group and the Lymington Society to the principle of the conversion is also noted.

8.23 However, consideration is also required to structural matters and whether the buildings are capable of conversion without significant detriment to the buildings and their surroundings (as this would impact on the significance of the heritage assets and their setting).

8.24 The application includes a structural survey report and preliminary structural appraisal for first floor support drawing. The report states that the barns have been inspected from time to time since 1993 with the latest inspection undertaken in October 2021. It concludes that the temporary repairs that were put in place more than 30 years ago have been effective in supporting the main structural elements, even if they are inappropriate in scale, manner of support and materials. However, the repairs recommended to the previous owners in 2009 were never carried out because the development given planning consent was never acted upon. This has left the barns vulnerable because the roofs are now in a much worse condition than in 2009 and the rate of deterioration is increasing. It recommends that the repairs specified in 1999 that were reiterated in 2009 be carried out in full, in conjunction with protecting the buildings by finding a purpose for them that makes such investment in their repairs worthwhile.

8.25 The Authority's Building Design and Conservation Team set out that, as noted by the British Archaeology Society, the internal structures should be self-supporting and cross section/elevation drawings should be provided to confirm this. Self-supporting structures would minimise the need for alterations to the fabric of the barns and prevent stresses on the historic structures, as well as maximising the reversibility of the new subdivisions and upper floors.

8.26 Additional comments have been provided by the Building Design and Conservation Team in relation to structural matters in early February 2026. Whilst the applicant has provided two preliminary structural appraisal plans, which has been welcomed, cross-section/elevation details are still required in order to understand how the new structural supports will interact with the historic fabric and hold the load of the first-floor accommodation. This is particularly important as the proposals following receipt of amended plans now significantly differ from the original proposal set out in the structural report and design, access and heritage statement, for example internal brick piers that appeared to provide structural support to the South Barn are now proposed to be removed. In addition, clarification is required in relation to the overall approach, which appears to differ between the design, access and heritage statement and the construction environmental management plan. Reference is made to the Environment Agency's concerns in relation to the structural stability of the buildings in relation to flooding and whether additional measures are required.

8.27 Overall, it is concluded that, given the significance of the grade II listed buildings, there is a strong case for the proposed conversion in heritage terms. However, this is dependent upon structural information and an acceptable approach in relation to historic fabric and full details on this matter have not been provided to date. In addition, there is an absence of detail of any additional measures are required to increase the structural stability of the buildings, above

that set out in the initial flood risk assessment, or if flood doors/barriers/gates are proposed for the occupants as these measures will require consent.

Conclusion

8.28 The historic significance of the barns is recognised and it has been put forward that residual use is the optimum viable use. Support from the Town Council, the Lymington Society and Council for British Archaeology is noted. However, as set out above, whilst residential use would appear to be the optimum viable use of the buildings and the adaptive reuse of the buildings set out in the amended information is supported from a conservation perspective, there is an absence of structural information and clarifications have not been provided to date on the approach to the historic fabric.

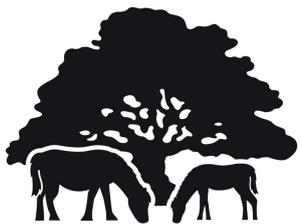
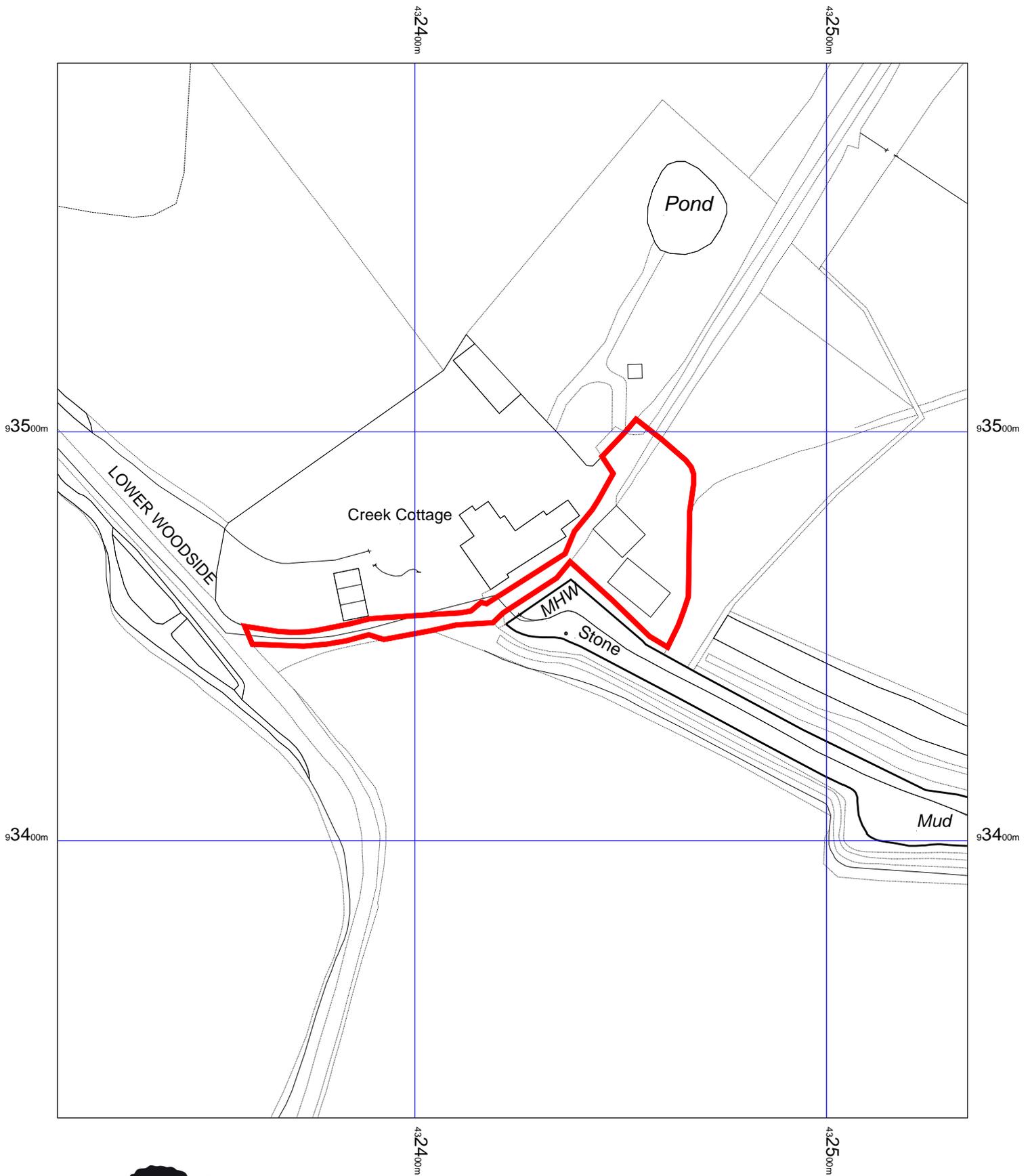
8.29 Having regard to this, a full assessment of the impact of the proposals on the features of special architectural or historic interest which the buildings possess cannot be made or whether the proposal would preserve the buildings and their setting, given the location within Flood Zone 3 (high probability of flooding) and potential impacts from this.

9. RECOMMENDATION

Refuse

Reason(s):

1. It has not been demonstrated that the grade II listed buildings are capable of conversion without significant detriment to themselves or their surroundings, contrary to Policies DP49(c) and SP16 of the New Forest National Park Local Plan 2016- 2036 (August 2019)s and the National Planning Policy Framework. Furthermore, the proposed development would not seek to further the purposes of the National Park, contrary to the requirement of Section 245 of the Levelling Up and Regeneration Act 2023, which amended Section 11A of the National Parks and Access to the Countryside Act 1949.



NEW FOREST
NATIONAL PARK

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