**21/01556/LBA**

**Midford Castle Access Road To Midford Castle Midford Bath Bath And North East Somerset BA2 7BU**

External alterations to include construction of Agricultural Barn and the installation of a stand-alone solar array system to service the Midford Castle Estate.

*Object*

Midford Castle is a Grade I 18th century Gothick-style country house situated within a rural, wooded portion of Bath’s Green Belt, the Cotswolds AONB, and the indicative and landscape setting of the City of Bath World Heritage Site. The tree belt to the west and north of the site is a designated Site of Nature Conservation Interest. To the north of Midford Castle is a cluster of ancillary Grade II\* early 19th century outhouses, including the Stables and Old Chapel, which positively contribute to the aesthetic and evidential understanding of Midford Castle’s function in the late Georgian period whilst enhancing the setting of a Grade I heritage asset. The Castle stands on an elevated platform, and the sloping parkland and scrub falling away contributes to its colossal prominence in the landscape, visible from areas such as Midford Lane. Consequently, part of Midford Castle’s aesthetic, architectural, and historic significance is also derived from its position in the rural landscape, and the visual relationship shared between the Castle’s use of Gothick architectural traditions and its picturesque context.

Midford Castle is now occupied as a residential dwelling, and listed building consent 18/03823/LBA has been granted for the conversion of the outbuildings to provide eight holiday lets.

BPT previously objected to application 19/03415/FUL, now permitted, for the construction of an agricultural barn to the west of the site and retrospective ancillary landscaping works, on grounds of major, adverse impact to the heritage significance and setting of a highly significant, well established cluster of Grade I and Grade II\* listed buildings and their local landscape character.

We appreciate the challenges of heating such a large group of buildings and acknowledge that the applicant seeks a more sustainable, innovative solution for self-sustainable means of heating and hot water generation on the site. In light of the declared Climate Emergency, there is a need to find low-carbon and renewable energy alternatives, but we maintain that proposed works should be consistent with sustaining and enhancing the significance of a historically interconnected group of listed heritage assets.

However, we are unable to support this application due to the unjustified excessive scale and height of the proposed barn, which we maintain would result in increased cumulative harm to the group value and setting of the Grade I Midford Castle and its Grade II\* outbuildings.

**Agricultural Barn**

BPT has concerns regarding the significant height and scale of the proposed agricultural barn, and we query whether this is necessary to meet the management and timber storage needs of the estate. The barn would be a minimum of 1800m3 in scale, and at least 5m tall at shoulder height with an as-yet unspecified height to the roof ridge. QED Engineering have advised that there should be a storage capacity of 60% of the full winter fuel requirement on site; 160m3 of timber storage would be allocated to the proposed barn, which would only make up 8% of the proposed volume. Whilst the D&A Statement notes that the barn would additionally be used for “hay storage, secure storage for plant and machinery along with other items associated with the management of the estate and winter shelter for livestock and for lambing”, we query whether this justifies the excessive height and floor plan of the barn. Considering the high degree of visibility across the estate between the site and the Castle and the inappropriate scale of the barn, we maintain that this development would result in further intrusion into internal views between the Castle and its outbuildings and cumulative harm to the complex’s contribution to wider landscape views. This would result in additional harm to the group value of the Grade I and Grade II\* buildings and a further deterioration of their shared landscape context. The insertion of a significant barn structure would serve to further visually ‘build up’ the Castle’s natural setting and disturb the special interest of the setting of a listed building and its appearance in views across the AONB and Green Belt. We strongly recommend that the case officer requests an agricultural appraisal to appropriately justify the proposed excessive and inappropriate scale of development.

We do not feel that the proposed appearance or use of materials demonstrates a bespoke, considered design approach to the context of the site. We maintain that the presence of a modern agricultural barn would not sit comfortably with the style and scale of other domestic stone buildings that form a group within this estate. We recommend consideration of alternative material treatments such as timber cladding (see Yorkshire boarding) to more appropriately blend with the barn’s wooded setting set back along the northern boundary, and better mitigate its visual intrusion into a historic group of buildings and their picturesque setting.

BPT is concerned that as part of application 19/03415/FUL, the original proposed function of the permitted agricultural barn was omitted as part of revisions; the barn is now permitted to house the biomass boiler, hot water tanks, and approximately 65m3 of fuel storage. We are worried that the scale of development required to facilitate the running of the biomass boiler and the estate has not been conceived as part of a cohesive site plan, but is being incrementally proposed in piecemeal applications, placing the site under increasing demand. Historic England’s *Historic Environment Good Practice Advice in Planning Note 3* (2017) emphasises the contribution of the setting in which heritage assets are experienced to the cumulative significance of a heritage asset and how that significance is appreciated, either in internal views or wider landscape views. This significance of setting is not dependent on public access. Therefore, we do not feel this is an appropriate approach given the sensitivity and historic significance of the site as the retained, intentionally rural setting of Midford Castle, as well as a complex of interrelated Grade I and Grade II\* buildings of shared group value and historic, architectural, and evidential significance.

**Solar Array**

BPT has some concerns regarding the accuracy of the drawings provided of the proposed solar array. We note that the layout and scale of the array varies between the proposed planting plan and proposed site plan and recommend this is clarified to ensure consistency throughout the application.

With regards to the solar array sections, the panels are shown as sitting on a completely flat stretch of land. This is inaccurate, and the land does have a gentle west-east slope of approximately 15 degrees as shown in photographs in the LVIA. This incline would consequently have an impact on the degree of shading across the panels and their visibility. We also emphasise that the panels would be of significant visibility within internal views across the site, particularly from the Castle. We therefore do not feel that the current plans provide appropriate detail on which to make a decision and feel that more accurate sections should be submitted to account for the existing characteristics of the land, as well as the wider context of the panels such as the proposed mitigating planting to the east and south.

We additionally recommend that further information is provided regarding the proposed screening measures, such as the planting of a hazel coppice along the eastern edge of the solar array to screen the site from wider sloped views to the south-east, such as Midford Lane. The effectiveness of the tree buffer is dependent on retaining good tree health and regular maintenance, and we therefore recommend that a management plan should accompany the proposal to ensure the long-term screening of development in sensitive, long-range landscape views.

**Conclusion**

We maintain that the addition of further agricultural buildings on this site would result in increased cumulative harm to the group value and setting of the listed buildings. The excessive height and scale and inappropriate appearance of the proposed barn has not been acceptably justified by demand or proposed use, and therefore it has not been demonstrated that the proposed harm is necessary for, or outweighed by, the proposed public benefit. This application is therefore contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990, section 16 of the NPPF, and Policies B1, B4, BD1, CP6, D1, D2, D3, HE1, NE2, NE2A, and NE6 of the Core Strategy and Placemaking Plan and should be refused or withdrawn.