**19/03415/FUL**

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

Erection of agricultural building and associated landscaping and land modelling works (part retrospective).

*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. To the north of Midford Castle is a cluster of ancillary Grade II\* 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.

Given that Midford Castle is a Grade I listed building of the highest significance, we continue to strongly advise that the conservation and care of this building is outlined as part of this application through a conservation management plan. This should be a requirement of any further development on the site necessitating planning consent, and a Condition of any permission granted.

Previously, BPT has objected in principle to this development due to the major, adverse impact that landscaping works have had on the heritage significance and setting of a highly significant cluster of Grade I and Grade II\* listed buildings and their local landscape character. We continue to argue that this degradation of setting would be further exacerbated by the construction of the proposed agricultural building.

Furthermore, the Trust continues to emphasise the unlawful nature of undertaking works to a listed building without first obtaining the relevant permissions. We take the disregard of planning regulations which exist to protect the unique value of heritage assets very seriously. We do not consider that retrospective permission should be granted and the LPA should take the necessary steps to remedy this breach and reverse the harm caused.

The fact that the work has been undertaken without permission has resulted in substantial harm to the special interest and significance of Midford Castle and its Grade II\* ancillary buildings. The LPA should send out a strong message that this unlawful approach to heritage buildings is a contravention that can lead to prosecution, rather than allowing or indeed encouraging the applicant to continue to undertake work without due diligence.

We continue to strongly object to this application and recommend that it is refused for the following reasons:

**Landscaping Work**

We maintain that a large part of Midford Castle’s aesthetic, architectural, and historic significance is 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. The Castle stands on an elevated platform, and the sloping parkland and scrub falling away contributes to its colossal prominence in the landscape. Consequently, the levelling and extension of the platform surrounding the Castle, and the creation of a domestic garden has compromised the appearance and elevated presence of the Castle in its romantic landscape setting, and contradicts its aesthetic interest. Furthermore, the unconsented preparatory works detailed in the D&A Statement including “excavation works for the proposed agricultural barn” has had a significant impact on the natural slope of the land as well as the Castle landscape’s previously wooded appearance over the site where the barn is proposed to be located. Therefore, the landscaping work undertaken has already had a hugely adverse aesthetic impact on Midford Castle in its landscape setting with minimal justification or mitigation for the deterioration of the context of multiple listed buildings.

**Agricultural Building**

The Trust continues to feel that the present landscape context is reflective of its intentional, romantic historic setting. The Castle’s dense woodland setting is cartographically evidenced to have been present along the site’s south and west boundary from the early 19th century, with Priory Wood remaining a solid green buffer to the north. Therefore, the interconnected aesthetic significance of Midford Castle and its rural context can be proven to have a historic origin likely contemporary to the Castle’s construction, and accordingly deliberate in the Castle’s location and the retention of adjacent woodland.

Consequently, our cartographic understanding of the site shows that the historic trees to the west of the Midford Castle site have been removed in the location of the proposed building. The siting of the agricultural building and associated loss of woodland will detract from the landscape character and harm the setting of the Castle, regardless of the proposed size or design of the agricultural barn.

Despite the reduction in the footprint and height of the proposed barn building, 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. The use of timber cladding remains incongruous with the established vernacular of the site. The addition of a Cotswold stone wall along the elevation facing the Castle further counteracts the supposed invisibility of the barn, consequently exacerbating the scheme’s impact on the setting of Grade I and Grade II\* listed buildings. With regards to the argued reduction in footprint, we feel that the current design’s external hard landscaping over the footprint of the previously proposed barn will have the same detrimental impact as the previous design, and renders the existing design the same size as previous.

Furthermore, the applicant has still not demonstrated that the building is needed for agricultural reasons; the Castle and estate does not appear to be a working farm. Despite some explanation for the necessity of the barn for storage and the installation of a biomass boiler, we maintain that the scale of the barn is excessive and inappropriate, and is not justifiably sized for maintaining a 20ha estate.

Ultimately, there continues to be insufficient justification for the proposed agricultural building, which fails to bring any public benefit to outweigh harm. The siting, appearance and permanent loss of historic woodland in its location causes substantial harm to the setting, group value, and romantic landscape significance of Midford Castle.

**Conclusion**

BPT emphasises that the harm caused would be substantial in its accumulated impact on this heritage asset. Despite the reduced size and height of the agricultural barn, the use of modern materials remains incongruous with the site vernacular, and the incorporation of hard landscaping within the scheme counteracts any aesthetic positives from the barn’s footprint reduction. We feel that the proposed screening, such as the Cotswolds stone wall, would instead draw greater visual emphasis to the barn, and would not suitably mitigate against the harm this proposal would cause. We cannot condone the unlawful works already conducted without listed building consent, and feel that the proposed benefits of the barn or ancillary replanting do not justify the loss of historic woodland or the contextual, picturesque setting of a Grade I listed building. 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.