

APPENDIX A – HISTORIC ENGLAND CONSULTEE COMMENTS (dated 12/06/2019)

St Peter & ST Pauls Church, Langport Road, Muchelney, Langport, TA10 0DQ Application No. 19/00817/FUL

Thank you for your letter of 15 May 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

This application seeks consent to construct a lean-to WC extension against the east wall of the north porch. Historic England provided pre-application advice to the PCC and their advisers in 2017 where we expressed serious concern that the implementation of this scheme would have a significant and harmful impact on the principle elevation of the church and that a more discreet location against the church tower would result in considerably less harm whilst providing the same facility. Consequently we are unable to support this application as proposed due to the resulting impact on the focal point of the primary facade of this grade I building, when an alternative, less harmful option exists.

Historic England Advice

Formerly a low lying island in the marshes of the Somerset Levels, Muchelney is an ancient and fascinating settlement. The village, whilst small, contains the remains of a number of important heritage assets: Muchelney Abbey (in the stewardship of English Heritage), a Benedictine Abbey dating from 939 and largely destroyed in the Dissolution of the Monasteries, the Priests House (National Trust) dating from 1308, the Grade I listed church of St Peter & St Paul, predominantly dating from the C15 but with Saxon origins as well as several other listed buildings.

The church is situated in the centre of the settlement, to the north of the Abbey and south of the Priests House. It stands in a raised and very open churchyard containing several specimen trees. Whilst the tower is prominent from the surrounding the farmland, the body of the church is also highly visible, particularly from the grounds of the Abbey to the south and from the east. Built of local lias rubble with Ham stone dressings, the building is a fine and impressive landmark within the landscape. The church is approached directly from the north up a gently sloping stone path to the north porch. Internally, the space feels very light and warm owing to the honey coloured stone, clear glass and open tower arch - slender ham stone columns rise up to support a spectacular C17 painted nave ceiling depicting cherubs and clouds. The pews are predominantly box-pews of the late C18-early C19 and match the panelling around the walls.

Historic England was previously consulted on the proposal to construct a WC in this location as part of the associated faculty application. At this time we expressed our serious concerns about the scheme proposed - a small lean-to building attached to the east side of the north porch, clad in timber, housing a fully accessible WC. An options appraisal was also presented and has been included within this submission, illustrating the various locations which could potentially house a new WC, both internal and external. From this document, it is clear that the proposed location, adjacent to the church porch, has a greater number of disadvantages than an alternative location, adjacent to the north wall of the tower. The chosen option is also acknowledged within the options appraisal to have a greater impact on the setting of the building than this alternative.

The approach to the church from the road is via a short path to the North Porch and whilst the path is lined and sheltered by trees, the view of the church is of the porch set symmetrically between the two windows of the north aisle. Consequently, the addition of a timber structure in this location would have a significant and harmful impact on the principle elevation of the church - a prominent new addition in such close proximity to an important architectural feature in this location will result in the overall unbalancing of the attractive,

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little-altered façade. As an alternative, less harmful location has also been included within the applicant's documentation, justification for this harm is not considered to be clear and convincing as required by the National Planning Policy Framework. Whilst we accept that a new structure adjacent to the church tower could also be prominent in the context of this highly visible church building, its impact would be tempered by existing trees and in oblique views from the path and the road, therefore creating a less obvious addition.

The submitted planning application has not heeded the above advice and still proposes to locate the extension to the east of the north porch. As a result, we maintain our earlier stance regarding the significantly harmful impact of this proposal on the principal elevation of the church. We consider that the more discreet location against the church tower would be considerably less harmful and would neither disrupt the symmetry of the church porch nor the primary, axial view of the building.

As the works proposed within this application will have a significant impact on a Grade I listed building, one of the top 2.5% of all listed buildings nationally and therefore of exceptional special interest, the proposal will need to be considered against the national legislation (Planning (Listed Buildings and Conservation Areas) Act 1990) and Chapter 16 of the National Planning Policy Framework. The NPPF advises in paragraphs 193-4 that any harm or loss to a designated asset should require a clear and convincing justification - unjustified harm is never acceptable, regardless of the public benefit it brings, if alternative and less harmful options exist. This applies most strongly to highly designated heritage assets. Before weighing up the harm against any public benefit associated with a proposal, it needs to be demonstrated that that harm cannot be avoided or reduced through amendments to the scheme, or offset by mitigation of the harm or enhancement of the asset (Para 190, NPPF). Historic England's Good Practice Advice Note 2: Managing Significance in Decision-Taking in the Historic Environment, sets out a clear process for making that assessment in paragraphs 6 and 25-26. When considering change, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be (Para 193, NPPF).

Due to the high designation and quality of the building under consideration and the contribution made by its setting, any change will need to be considered against the high bar set out in the legislation and policy, and robustly justified. At present, we have significant concerns regarding the proposals and the supporting justification for the chosen scheme. We would strongly urge you to reconsider Historic England's suggested alternative location for the WC, which would substantially reduce the overall impact of the extension on the historic character, quality and dignity of the principle façade of this exceptionally significant historic church.

Recommendation

Historic England objects to the application on heritage grounds. We consider that the application in its current form does not meet the requirements of the NPPF, in particular paragraph numbers 190, 193, 194 and 196.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.