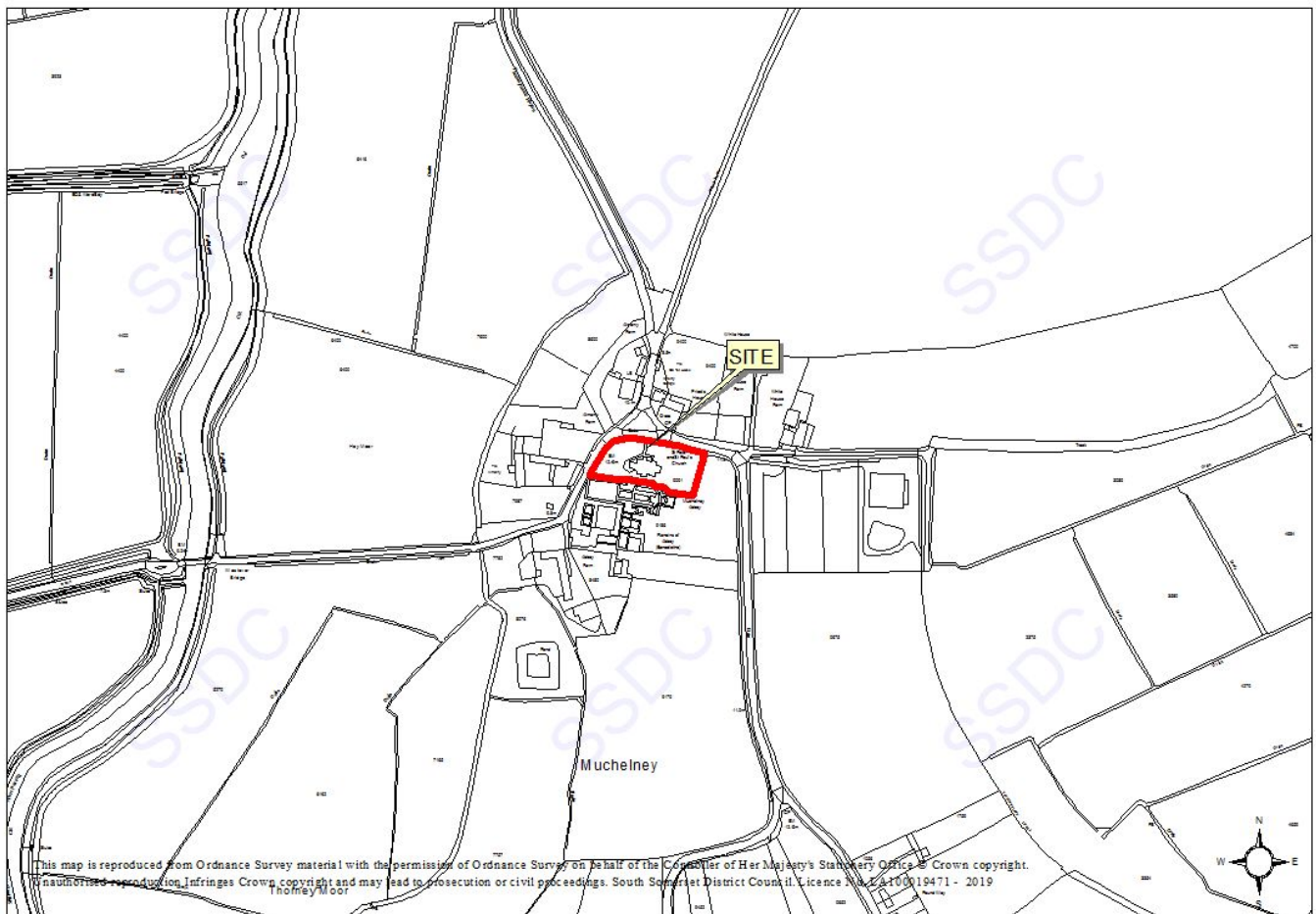


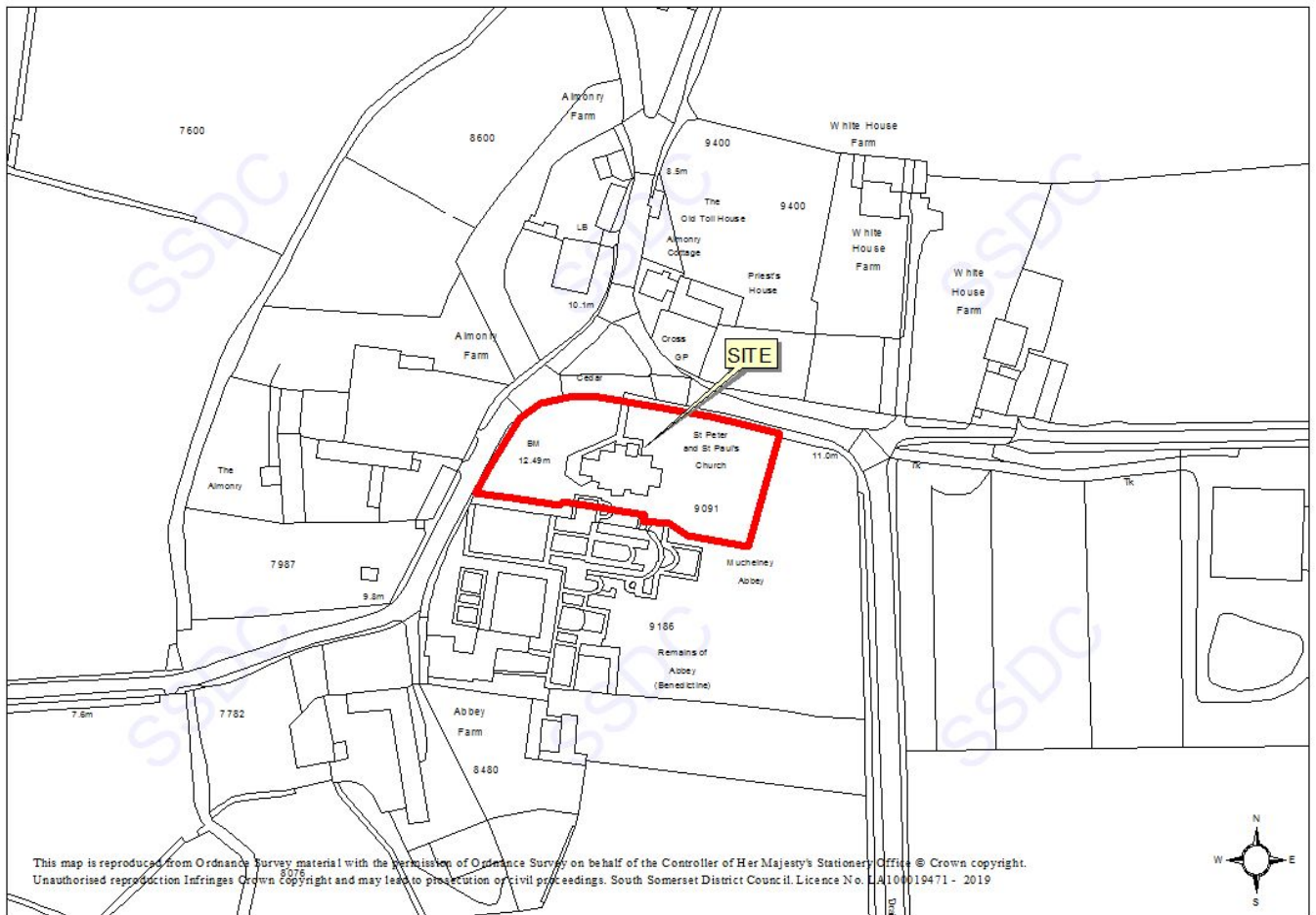
Officer Report On Planning Application: 19/00817/FUL

Proposal :	Construction of a disabled WC extension between the North Porch and North Chapel, accessed externally, with amended stone path for access.
Site Address:	St Peter And St Pauls Church, Langport Road, Muchelney.
Parish:	Muchelney
BURROW HILL Ward (SSDC Member)	Cllr M Stanton
Recommending Case Officer:	Alex Skidmore Tel: 01935 462430 Email: alex.skidmore@southsomerset.gov.uk
Target date :	27th June 2019
Applicant :	Sarah Nicholas
Agent: (no agent if blank)	Mr John Beauchamp, Benjamin + Beauchamp Architects, The Borough Studios, The Borough, Wedmore BS28 4EB
Application Type :	Minor Other less than 1,000 sq.m or 1ha

REASON FOR REFERRAL TO COMMITTEE

The application has been referred to Area North Committee at the request of the Ward Member and with the agreement of the Area Chair to allow for the differing arguments, in particular those provided by the professional conservation consultees, to be considered further in conjunction with the relevant planning policy.





SITE DESCRIPTION AND PROPOSAL

This application is seeking full planning permission for the construction of an extension to the north elevation of St Peter and St Paul's Church, Muchelney to accommodate a WC. The proposed extension is to be positioned immediately to the east of the north porch, which is the principle entrance to the Church, and will be accessed externally only, as such the proposal also includes alterations to the existing stone path to facilitate this arrangement.

St Peter and St Paul's Church (SPSP Church) is a working Parish Church that is grade I listed and located within a Conservation Area where there are numerous other listed buildings in its immediate environs. Of particular significance is Muchelney Abbey, which adjoins the Churchyard on its southern side, and is a Scheduled Ancient Monument which includes extensive ruins as well as the principle retained building which is grade I listed as well as the Monks' Reredorter (toilets) which is grade II* listed. A short distance to the north of SPSP Church on the opposite side of Langport Road is The Priest's House, also grade I listed, as well as the grade II listed village cross which is positioned within the intervening grassed triangle that intersects the road junction.

The gateway into the churchyard is to the north of the Church from the adjacent public highway and directly aligns with the north porch entrance with the two connected by an existing stone flagged path. To the north of the position of the proposed extension is a small group of trees, including Yew which provides some screening of the application site from the public highway to the north. The site is located in flood zone 1.

HISTORY

13/03155/TCA: Notification of intent to fell a Holly tree and to carry out tree surgery works to a Ginkgo and a Portuguese Maple. Permitted.

13/02319/TCA: Notification of intent to carry out works to 2 no. trees within a conservation area. Withdrawn.

08/02847/FUL: Provision of access and handrail for disabled visitors. Permitted.

08/02848/LBC: Provision of access and handrail for disabled visitors. Permitted.

POLICY

Section 38(6) of the Planning and Compulsory Purchase Act (2004), and Paragraphs 2, 11, and 12 of the NPPF indicate it is a matter of law that applications are determined in accordance with the development plan unless material considerations indicate otherwise.

For the purposes of determining current applications the local planning authority considers that the adopted development plan comprises the policies of the South Somerset Local Plan 2006-2028 (adopted March 2015).

Policies of the South Somerset Local Plan (2006-2028)

SD1 - Sustainable Development

EP15 - Protection and Provision of Local Shops, Community Facilities and Services

EQ2 - General Development

EQ3 – Historic Environment

EQ5 - Green Infrastructure

EQ7 - Pollution Control

National Planning Policy Framework

Part 2 – Achieving sustainable development

Part 8 – Promoting healthy and safe communities

Part 12 – Achieving well-designed places

Part 14 – Meeting the challenge of climate change, flooding and coastal change

Part 16 – Conserving and enhancing the historic environment

Planning (Listed Buildings and Conservation Areas) Act 1990

CONSULTATIONS

Muchelney Parish Council: No comments received.

County Highways: Referred to their standing advice.

SSDC Highway Consultant: No highway issues.

County Archaeology: The site lies adjacent to the medieval church of St Peter and St Paul in Muchelney. This is an important archaeological and historical site and any works here are likely to have an impact upon buried archaeological remains. Discussion on the impacts and harm on the character and appearance of the church has resulted in a range of options being put forward. The options for a building on the East side of the N Porch or an alternative location below the N side of the tower are the

two options up for deliberation. Both of these locations have an impact upon the character and appearance of the church.

The below ground archaeological impacts are likely to be similar for both site options. The proposed works will affect buried deposits, unmarked graves and other archaeological remains.

For this reason I recommend that the applicant be required to provide archaeological monitoring of the development and a report on any discoveries made as indicated in the National Planning Policy Framework (Paragraph 199). This should be secured by the use of the following conditions attached to any permission granted:

- Programme of Works in Accordance with a Written Scheme of Investigation (POW):
Before the commencement of the development hereby permitted the applicant, or their agents or successors in title, shall have secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation (WSI) which has been submitted and approved in writing by the Planning Authority. The WSI shall include details of the archaeological excavation, the recording of the heritage asset, the analysis of evidence recovered from the site and publication of the results. The development hereby permitted shall be carried out in accordance with the approved scheme.

and:

- Archaeology and ensuring completion of works:
No building shall be occupied until the site archaeological investigation has been completed and post-excavation analysis has been initiated in accordance with Written Scheme of Investigation approved under the POW condition and the financial provision made for analysis, dissemination of results and archive deposition has been secured."

Historic England: Objects 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.

A summary of their comments are below with full comments available at Appendix A at the end of this report:

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.

Subsequent comments – "I have expressed my concerns about the proposed WC location since my initial discussions with the PCC, citing specifically what Historic England consider to be the resulting significant and harmful impact on the principle elevation of the church - the disruption of the symmetry of the porch and flanking windows within the primary, axial view of the building. I have not however made any objections to the principle of the installation of a WC in a suitable external location and have advocated the space between the tower and aisle since my initial visit in 2017.

I entirely appreciate the issues with the internal option, as the doorway to the vestry is not wide enough and the barrel organ is a rare instrument.

This case has how been the subject of several team discussions and every time, my colleagues and I

have agreed that the location at the base of the tower is considerably less harmful to the historic character, quality and dignity of the principle façade of this building. Churches often have small extensions in this location, often of considerably lesser quality than that you are proposing and therefore whilst we accept that it will be visible from some locations, we do not feel that this will cause such visual disruption to the external quality of this exceptionally significant building as the alternative. We accept the considerable public benefits which will result from the installation of a WC in any location, but as an alternative which we consider to be less harmful to the significance of the building is possible, we do not accept that proceeding with the current option will comply with para. 190 of the NPPF to “avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal,” nor with paras 193-4 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.

With regard to the practicalities of the water run-off from the tower – at present, I don’t think we have sufficient information to be able to assess the rainwater issues and whether these could be solved either by a downpipe, gutter, amendment to the gargoyle, redirection of the outfall (is there only one?), etc. I would be happy to discuss this further however.

I hope that this clarifies our position and that we would be willing to discuss how the issues regarding rainwater from the tower can be resolved.”

Latest comments (following publication of the Consistory Court decision) - I can therefore confirm that HE’s views have not changed following this decision and we stand by our previous comments and objection.

SSDC’s Conservation Officer: Objects. Agrees with Historic England’s views.

Initial comments - I met with the architect John Beauchamp and had a thorough look round the site. This is a Grade 1 listed building and a very sensitive site adjacent to a schedule Ancient Monument. It also sits within the Muchelney Conservation Area.

For completeness I did look at all of the options that were originally considered for the introduction of toilets on the site. In pure heritage terms my preference would be for a remotely located toilet block adjacent to the drive to Muchelney Abbey. However I understand that due to the demographic of the congregation this will be completely impractical.

I am clear that there are no internal options that would not cause substantial harm. The obvious location is the South Porch but this has a significant Barrel Organ installed in it. It still in my view represents the best of the interior options. If the church becomes redundant, I am sure there will be pressure to relocate it. There is also agreement in principle to remove pews at the rear of the church to provide better access. If we can’t reach agreement on an exterior location, then the south porch should be considered. I am also clear that options on the south side of the church adjacent to the abbey are very difficult to achieve. Therefore I have concentrated on the two preferred options. The block adjacent to the tower and the block adjacent to the north porch.

From the outset I need to be clear that if this was a secular building I would consider either of these options as representing substantial harm to the setting of the listed heritage asset. However with this being church if we do not find a beneficial use for the building then alterations for a potential new use are likely to be even more damaging so I am focusing on a solution that represents high level less than substantial harm as prescribed in NPPF.

In my opinion there is very little to choose between the two options. The proposal at the tower and the building will have a greater impact on the wider village and be more visible in the public realm and will cause greater harm to the Conservation Area. It will have less impact for people visiting the church as

they approach the porch. The proposal next to the porch will be less intrusive in the wider village and Conservation Area but will have a very significant impact on the experience of the church as you approach up the pathway to the porch.

What has become clear to me is that we know a lot about the heritage merits of the two different schemes but no clear evaluation has been carried out regarding the public benefit of the two individual options and the reasons why there is such a divergent view. This is very important as ultimately the planning officer will need to balance these public benefits against the harms in order to make a decision. We also now have the issue of trees which is likely to impact on one of the preferred options.

So that we can make an informed decision I have asked the architect to prepare a statement for both options that details the public benefits and the difficulties in achieving the scheme. Once we have this then I think it will be a question of a planning officer balancing the harm is against the benefits.”

Latest comments (following the submission of additional information) - I can confirm that my previous advice still stands. I think the choice between the two options is finally balanced. They both cause high level less than substantial harm. The public benefit is identical. My view remains the same. I concur with Historic England that the tower option is slightly less harmful than the option next to the porch. Therefore I still can't support the current proposal.

SSDC Tree Officer: Initially recommended the application be refused due to concerns relating to likely negative impacts of the development upon adjacent trees and the lack of any arboricultural consideration given to how these trees might be protected under this proposal. Following detailed discussions and negotiations between the Tree Officer and the agent appropriate information was submitted which addresses these concerns. Consequently the Tree Officer has dropped his objection subject to the imposition of the following tree protection condition should the application be approved:

- Prior to commencement of the development, site vegetative clearance, demolition of existing structures, ground-works, heavy machinery entering site or the on-site storage of materials, a scheme of tree and hedgerow protection measures shall be prepared by a suitably experienced and qualified arboricultural consultant in accordance with *British Standard 5837: 2012 - Trees in relation to design, demolition and construction* and submitted to the Council for their approval. Upon approval in writing by the Council, the scheme of tree and hedgerow protection measures (specifically any required ground-protection, fencing and signage) shall be installed prior to any commencement of the development and it shall be inspected and confirmed as being satisfactory by the appointed arboricultural consultant in-writing. Prior to commencement of the development, the suitability of the tree and hedgerow protection measures shall be confirmed in-writing by a representative of the Council (to arrange, please contact us at planning@southsomerset.gov.uk or call 01935 462670). The approved tree and hedgerow protection requirements shall remain implemented in their entirety for the duration of the construction of the development and may only be moved, removed or dismantled with the prior consent of the Council in-writing.

REPRESENTATIONS

Written representations have been received from 11 households, of which 8 households expressed support for the proposal whilst the other 3 objected. It should be noted that the following is a brief synopsis of the comments made by these interested parties and that full details of their comments can be found on the Council's website.

Comments and observations made by those in support of the proposal include:

- The Church is an essential part of our community and could be used more if there were better

facilities.

- Muchelney has no secular building and it is very unlikely that the land and funds could be found to fund one. The only community building is the Church.
- As a resident that was flooded in 2012 and 2014 the Church was a focal point that kept us sane.
- Having a loo will make the Church more user friendly for all, including the young and elderly.
- The provision of a toilet would enable the use of the church for a much greater range of community activities in a village.
- Aside from the greater public benefit, the provision of a toilet would be of great assistance to those attending weddings or funerals and who do not have the benefit of living locally.
- This village sorely needs a space for all to come together, a place where a community spirit, present already but constrained by lack of suitable space, can be given the opportunity to extend and flourish. In the floods of 2013/2014 the building provided a central space where the community did come together and work together - the whole community, those of no faith and those of faith, all in support of one another.
- The proposed disabled loo will be of enormous benefit to the village and also prolong the life of this beautiful and historic Church.
- Last year a portaloo, which was sponsored by a local businessman, was extensively used proving the need for such a facility.
- This planning application, is a major step towards giving this valued, beautiful, historic building a new lease of life as a servant of the needs of the whole community.
- The Church is also "rare" in that it is open to the general public every day - enabling visitors, as well as our village community, to appreciate the beauty and uniqueness of both its exterior and interior.
- It is evident that there will be some effect on the visual aspect on the North side. That said, care has been taken to minimise the visual impact, and it is my firm view that the detriment of the installation of the toilet is far outweighed by the public good to be achieved.
- Over the past centuries, many changes have taken place in and around the church. This proposal is to enable new opportunities for a modern culture with minimum impact on a beautiful and much loved building.
- Numerous options, internal and external, have been considered and discussed over many years between Muchelney PCC and the Diocesan Advisory Committee (DAC). After all that discussion the current position was considered to be the most appropriate.
- Comments are made on the practicalities of locating the WC by the north tower (as preferred by HE) in view of surface water overflow from above is surely a problem that can be overcome.
- The roofline of the WC will be visible from the interior and particularly to those occupying the adjacent pews. If it were against the tower the roofline would still be visible however it would be behind the pews and not visible upon entering as the eye would be looking to the east towards the altar.
- The design and proposed use of materials (in particular the use of timber) does not take into regard the importance of the building and its status.
- Detailed proposals for the drainage should be provided to ensure that it is feasible without impacting upon graves, path or tree roots.

Concerns and observations made by those objecting to the proposal include:

- The proposal will have a significant detrimental impact upon the Church.
- The proposed location of the WC on the main entrance directly facing the highway will have a significant and detrimental impact on the architectural integrity of the Church.
- The WC is in a prominent location and visible from the road and main entrance path to the Church. It is inappropriate for it to be close to the entrance.
- The proposal appears to obscure one third of one of the windows and will upset the overall symmetry of the north elevation thus creating an eyesore as visitors approach.

- A more sensitive location would be on the back (south) of the Church.
- The design does not fit with the wonderful stone structure of the Church.
- The need for the WC has not been proven. There are occasional events in the Church but more should be organised to test the demand and see whether a WC is necessary.
- Application contrary to LP policies SS2 (Rural Settlements), EP15 (Protection and Provision of Local Shops, Community Facilities and Services and EQ3 (Historic Environment).
- Since the floods of 2014 considerable works have been carried out to ensure that such flooding does not happen again including the raising of one of the roads into the village so that this should remain usable should such flooding be repeated.
- The lack of open space or a WC did not prevent the Church from being used during the floods.
- The Church was used extensively during the floods but has not continued since.
- We are a small village and within a short distance of bigger villages with modern hall that are able, and do, hold wider events.
- Even with some pews removed the Church will never be a comfortable venue for concerns, films, suppers etc.
- Organisation such as Historic England and The Society for the Protection of Ancient Buildings have expressed concern and re against this proposal. Their views should be respected.
- All the elevations of the Church are prominent from the surrounding roads and Muchelney Abbey and so wherever the WC is located externally it is bound to be visually intrusive. It is important that this intrusion is kept to a minimum, I cannot see that the current siting fulfils this requirement.
- This will look artificial and be seen to be hiding a lavatory in a shed.
- Its siting does not leave much room for planting.

The National Trust have also made written representations objecting to this proposal:

- The National Trust owns the Priest's House, a late medieval hall-house that is grade II listed, and which lies opposite the church. The Trust has a statutory duty under the National Trust Acts to promote the conservation of places of historic interest and natural beauty. The Trust generally supports the addition of facilities to make historic buildings more usable. However, the proposed extension would be in a position where it is immediately visible from the front door of Priest's House, so it would have an impact on the property's views and setting. In addition, we are concerned that - due to its position and design - the extension would detract from the entrance to the church and compromise its design and appearance. This visual impact would affect all these using the church or visiting this historic village. In conclusion, we are unable to support the proposed extension due to its location and design, and we consider that there are more creative and thoughtful interventions (internal or external) that could be undertaken to provide a WC facility to serve the church.

CONSIDERATIONS

This application is seeking full planning permission for the construction of an extension to the north elevation of St Peter & St Pauls Church (grade I) to accommodate a WC. The proposed extension is to be freestanding and will be positioned immediately to the east of the north porch, which is the principle entrance to the Church, and will be accessed externally only, as such the proposal also includes alterations to the existing stone path to facilitate this arrangement.

Principle

The Parish Church at Muchelney is the only community facility to be found within the village and at present does not benefit from any toilet facilities. The provision of a toilet for the Church will undoubtedly make the building more user friendly not just for its primary function as a Parish Church but also with the view to improving its usability for other community related uses. A matter that should be given

considerable weight given the deficiency of any other potential buildings being available within the village for community use. It is noted that neither the Council's Conservation Officer nor Historic England object to the principle of the provision of a WC at the Church, as such the principle of the proposed development is considered to be acceptable.

Impact on designated heritage assets

As noted earlier in this report St Peter & St Paul's Church is grade I listed. It is also located within a designated Conservation Area with numerous other listed buildings close by, such as Muchelney Abbey (grade I / II*) to the south and The Priests House (grade I) to the north. The application must therefore be considered against national legislation (Planning (Listed Buildings and Conservation Areas) Act 1990) and Chapter 16 of the National Planning Policy Framework (NPPF).

Paragraphs 193-194 of the NPPF state that any harm or loss to a designated heritage asset should require a clear and convincing justification and that substantial harm to or loss of assets that are of the highest significance, such as grade I and II* listed buildings, should be wholly exceptional.

The current application has been made following extensive discussions between the Parochial Church Council (PCC) and the Diocesan Advisory Committee (DAC), as well as consultation with Historic England (HE). Whilst it would appear that all parties, including the Council's own Conservation Officer, are in agreement that it is not feasible to provide a WC within the Church building, there is disagreement as to the most appropriate position for the WC on the outside of the Church. Further to this, it is noted that none of these parties are raising any particular objection to the design and proposed use of materials for the WC extension, it is only the proposed location that is in dispute.

The current application proposes to erect a modest timber clad extension on the east side of the north (main) entrance to the Church to house the disabled toilet, with access to the toilet being from outside the Church building only. This position is advocated by the PCC and DAC but is strongly objected to by Historic England. In the view of Historic England there is an alternative position, on the north side of the tower, which would result in less harm to the setting of the Church than that currently proposed on the east side of the north entrance.

Historic England observes that *"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, 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."*

"We (Historic England) 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."

"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."

Conversely, the recent Judgement by The Consistory Court of The Diocese of Bath and Wells disputed Historic England's views (see Appendix B at the end of this report). They note that the position proposed by Historic England on the tower would impact upon views of the West entrance which is in the tower. They observe that the West entrance was the original main entrance to the Church and that this is still used for weddings and other important ceremonies and that standing back from the West door, the symmetrical view of the West elevation would be disrupted if a WC were to be built on the North side of the tower. They further consider that the current proposed position to the east of the North porch is the least problematic within what is a difficult site noting that there is the opportunity to screen the structure with planting, the potential for accommodating drainage beneath the pathway as well as the practical benefits of easy access from the North door. They summarise by stating that it is difficult to reconcile the assertion of significant harm arising from the scheme proposed with the apparent absence of harm in a visible site adjacent to the tower.

It is the opinion of the Council's Conservation Officer that the preference between each of these positions is finely balanced. He notes that Historic England's preferred location by the tower would have a greater impact on the wider village and be more visible in the public realm causing greater harm to the Conservation Area but that this would have less impact for people visiting the Church as they approach the North porch. However, the proposal next to the North porch will be less intrusive in the wider village and Conservation Area but will have a very significant impact on the experience of the Church as you approach up the pathway to the porch.

At the request of the Conservation Officer the applicant provided additional supporting information in an effort to justify the position proposed as opposed to that advocated by Historic England. Unfortunately this additional information has failed to alter Historic England's views, and they remain convinced that of the two options that Historic England's suggested alternative location for the WC by the tower would substantially reduce the overall impact of the extension on the historic character, quality and dignity of the principle façade of what is an exceptional significant historic Church. The Council's Conservation Officer has confirmed that he agrees with the views of Historic England

Neither Historic England nor the Council's Conservation Officer consider that a clear and convincing justification for the proposed location has been made, and indeed are of the opinion that an alternative and less harmful option exists. Furthermore, the public benefit arising from the proposed WC would be the same whether it is positioned by the north porch or on the tower and as such offers no weight in favour of one particular option. Therefore based on the advice of Historic England and the Council's Conservation Officer it is concluded that the proposal is contrary to the guidance set out within paragraphs 193-194 of the NPPF as well as the aims and objectives of Local Plan Policy EQ3 and should accordingly be refused.

Other matters

- Impact on trees – There are a number of trees within the confines of the graveyard including several that are located close to the site of the proposed extension. Additional information has been provided during the course of the application which has addressed the Tree Officer's initial concerns and subject to a tree protection condition being imposed the Tree Officer has confirmed

that he no longer wishes to object to this application.

- Residential amenity – The siting, modest scale and nature of the extension is such that it will not result in any demonstrable harm to the residential amenities of nearby residents.
- Highway safety – The position and nature of the development is such that it will not be prejudicial to highway safety.
- Flooding and drainage – The location of the site is in flood zone 1, which is considered to be at the lowest risk of flooding, furthermore it is considered that drainage details can be appropriate addressed through condition.

Conclusion

As a grade I listed building St Peter and St Paul's Church has been identified as being amongst the most significant designated heritage assets in the country and as such should be afforded the greatest of protection, with any change to its fabric or setting considered against the high bar set out in legislation and policy and requiring robust justification.

It is accepted that the provision of a disabled WC for the Church will meet a recognised need for such a facility both in terms of the Church's primary religious function as well as its use as a community building and as such represents a significant public benefit. However, prior to weighing up the harm of the proposal against any associated public benefits it needs to be demonstrated that the identified harm cannot be avoided or reduced through amendments to the scheme (para 190, NPPF).

It is clear that the provision of a WC in any of the positions discussed will cause harm to the setting and appearance of the Church. Both Historic England and the Council's Conservation Officer are of the opinion that a more favourable viable option that would be less harmful to the setting and appearance of the Church is available. On this basis it is considered that no clear and convincing argument has been made that justifies the proposal as submitted and accordingly the proposed development is contrary to the requirements set out within paragraphs 190, 193-194 of the NPPF as well as the aims and objectives of Local Plan Policy EQ3.

For these reasons the application cannot be supported and is therefore recommended for refusal.

RECOMMENDATION

Refuse consent for the following reason:

No clear and convincing argument has been made that justifies the proposed development as submitted. It is considered that there is a more favourable viable option, in regard to the position of the WC, that would cause less harm to the setting and appearance of this grade I listed Church, accordingly the proposed development is contrary to the aims and objectives of Policy EQ3 of the South Somerset Local Plan as well as the requirements of the National Planning Policy Framework, in particular paragraphs 190 and 193-194.
