



**West Bradley House, West Bradley
Somerset BA6 8LT**

Refurbishment and alterations to Grade II listed main house and adjoining structures, demolition of redundant agricultural and storage buildings and replacement with new ancillary residential buildings, refurbishment and conversion of barn / farm office to ancillary residential use, conversion of barn to staff annexe, alterations to landscape and access.*

Planning Statement

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AZ URBAN STUDIO

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West Bradley House, West Bradley Somerset BA6 8LT

Client:

Mr. Tjaart Steyn

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Reference: AZ2227
Status: Submission
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1. INTRODUCTION

- 1.1. This Planning Statement has been prepared by AZ Urban Studio on behalf of our client, Mr. Tjaart Steyn, in support of applications for full planning permission and listed building consent for development and works at West Bradley House, West Bradley, Somerset, BA6 8LT (“the Site”).
- 1.2. The main house dates from the early C18, but over the last century the Site has been developed and altered to meet the needs of a large apple orchard business, with new utilitarian buildings and landscape alterations changing the setting of the focal country house and associated grounds. Various phases of change have also occurred at the main house itself, which is in a habitable condition but suffers from water ingress as a result of the design of the later-added roof form. The roof is also in poor structural condition requiring replacement.
- 1.3. The orchard business ceased operation in recent years and the Site was sold to the present owners, who wish to undertake a comprehensive program of conservation-led building and landscape development to restore the house as the focal point of this modest rural Estate, and enable the residential use to thrive into the future to ensure it will conserve the listed building and its setting.
- 1.4. The proposals have been the subject of detailed and extended pre-application engagement with the Local Planning Authority, Historic England, and the local community over the last 18 months. This pre-application process has involved numerous meetings with Somerset Council planning and conservation officers and the Historic England Inspector of Historic Buildings and Areas, through which a series of amendments have been made to the proposals, resulting in a scheme that received support at the conclusion of the second pre-application enquiry. No final written pre-application response has been received to date from Somerset Council in regard to the second pre-application enquiry, but the proposals were understood to have been supported in principle in the final pre-application meeting held.
- 1.5. As part of the first pre-application enquiry Somerset Council sought input from a range of consultees, and the pre-application response (2022/2486/L4PA) provided responses from them. The design team have used those responses

and advice contained therein to shape the proposals and submission material now presented.

- 1.6. Given the extensive and detailed pre-application engagement with Somerset Council and Historic England that has shaped the proposals, together with the clear support of the local community, we trust that the full planning application and listed building consent applications can be determined in a timely manner to allow the Applicant to proceed with the project.
- 1.7. The purpose of this Planning Statement is to set out the relevant planning context and policy engaged by the proposals, and provide an assessment of the proposals against both the objectives and requirements of such policy, together with any other guidance and material considerations. In doing so, the Planning Statement draws heavily on the comprehensive suite of documentation submitted in support of the applications, and does not seek to repeat in detail descriptions or analysis provided in those documents. The relevant drawings and documents should be examined for full details of all matters summarised here for planning purposes. In particular, the DAS prepared by Richard Parr Associates provides a detailed explanation of the journey that the project has taken since 2022, and describes the design of each element of the proposals fully. As such, this Planning Statement draws heavily upon and references the DAS.
- 1.8. The applications are supported by an appropriate suite of drawings and documentation prepared by appropriately qualified professionals, in accordance with the requirements of the published Somerset Council (East Team) Planning Application Validation Guidance (1st May 2023), and comprises the following:
 - Architect's drawings suitable for full planning application and listed building consent (Richard Parr Associates);
 - Design and Access Statement (Richard Parr Associates);
 - Structural Survey Report (Hydrock);
 - Energy Statement (p3r Engineers);
 - Flood Risk Assessment (Hydrock);
 - Drainage Strategy Report (including Nutrient Neutrality Assessment) (Hydrock);
 - Landscape Report (Urquart & Hunt);
 - Highways Access Review (Pell Frischmann);

- Archaeology Appraisal (BSA Heritage);
- Heritage Appraisal (Justin Ayton);
- Ecological Impact Assessment and Biodiversity Report (Engain);
- Construction Ecological Management Plan (Engain);
- Biodiversity Net Gain Assessment Metric (Engain);
- Preliminary Ecological Investigation Report and Stage II Bat Surveys (Greena Ecological Consultancy);
- Arboricultural Impact Assessment and Tree Protection Plan (Bosky Trees);
and
- this Planning Statement (AZ Urban Studio).

2. THE SITE / SURROUNDINGS AND PLANNING HISTORY

- 2.1. The site falls within the administrative area of Somerset Council, with Somerset Council being the Local Planning Authority (LPA), Local Highway Authority (LHA) and Lead Local Flood Authority (LLFA).
- 2.2. West Bradley itself is a village and civil parish located approximately 6 km to the south-east of Glastonbury. The Site is accessed via a single-track driveway which connects to the undesignated road through the village of West Bradley to the south. A secondary access is also available and runs approximately parallel north of the main drive, before turning south to the main house.
- 2.3. The house and main built complex is situated immediately to the north of the West Bradley Parish Church and to the south and east of the orchards and walnut growing areas that form the wider site.
- 2.4. The setting of West Bradley House is defined by the landscaped garden with its interconnected ponds, the orchards, associated outbuildings and the visual relationship with the church. A stream – Bradley Brook – is located just to the north of the main house. The grounds include spacious lawns, fishponds, shrubberies and plantations, an allotment-like growing area, and a tennis court.

The Main House

- 2.5. West Bradley House is a small house constructed in c.1720 by William Piers. It has a basement plus three storeys and an attic, with each storey built of different coloured coursed rubble with limestone string courses, quoins, and window surrounds. It has an irregular octagonal plan, which is an unusual form for its period, formed by a square with two bayed sides.
- 2.6. The House is listed at Grade II* and was first included upon the statutory list in June 1961. The cartographic evidence shows the house had been remodelled by 1886 from its original form with the northern extension having been added. That extension reflects the present situation, albeit it too has been modified and altered.

2.7. Internally, the building retains few C18 fixtures or fabric, and this is indicative of a major remodelling taking place after the original construction. This is reinforced by the changes which have taken place to the plan form which, in turn, have affected the understanding and appearance of the interior. Full description and assessment is provided in the Heritage Appraisal by Justin Ayton.

Outbuildings

2.8. The outbuildings comprise a number of different buildings of which the brick and stone (blue lias) barn (“the Little Stone Barn”) to the north of the stream and bridge is the earliest and is contemporary to the house. It is much altered, and the north elevation has brick infill. It is in poor condition.

2.9. The large warehouse-style “Apple Barn” immediately to the east of the house is dated 1900. It has a lower ground floor and upper floor supported on cast iron columns containing offices, which extend to the midpoint of the barn, after which it is a full height space. The original 1900 barn is built in stone with double roman tiled roof.

2.10. A modern, mid C20 rendered blockwork barn (“the Concrete Barn”) has been built on the south side and is of no interest or merit. Other outbuildings including an open fronted, single storey range which is of an early C20 date but is much altered through repair and replacement. To the west of this range are further modern rendered block and asbestos roofed agricultural sheds, again of no merit as set out in the Heritage Appraisal.

Designations and constraints

2.11. The Site is not subject to any specific planning policy designations within the adopted Mendip Local Plan Policies Map.

2.12. The site is not within, nor close to, any conservation areas. As well as the building itself being listed at Grade II*, the only other listed building in the Site’s immediate vicinity is the parish church, which is also listed at Grade II*. Higher Farmhouse, located some distance to the east, is listed at Grade II.

- 2.13. No trees on the site are subject to any Tree Preservation Orders (TPOs). In terms of landscape character, the site is located within *National Character Area Profile: 143 Mid Somerset Hills (NE564)*, but is not subject to any designations.
- 2.14. Natural England have advised that, in light of the unfavourable condition of the Somerset Levels and Moors Ramsar Site, before approving a planning application that may give rise to additional phosphates within the catchment risk area, competent authorities should undertake a Habitats Regulations Assessment (HRA).
- 2.15. In practice, this means the HRA for housing and other applications in the risk area will need to include a phosphate loading calculation and measures to reduce phosphates in drainage leaving the Site, to achieve 'nutrient neutrality' compared to the existing situation.

Planning history

- 2.16. The site planning history has been taken from information available on Mendip Council's online planning register, and is summarised in the table below:

Reference No.	Application Description	Decision
106601/000	Internal alterations to modernise building; demolition and rebuilding of existing chimneys; construction of single storey sunroom at side; restoration of second floor windows to original size	Approved 21/04/1987

- 2.17. The documents relating to the above planning application are not available to view online, however the description itself tells us that alterations to the building have been made with the approval of the Local Planning Authority within the last forty years (and since the building was listed).
- 2.18. The current footprint and floor areas of the buildings present within the red line boundary are approximately –

Building Footprint

Residential 313.5sqm

Agricultural	1002sqm
Total	1315.5sqm

Floor area (GIA)

Residential	520sqm
Agricultural	1110.9sqm
Total	1630.9sqm

2.19. As reported further in this Statement, the proposed development will result in a reduction of both built footprint and floor area at the Site.

3. ASSESSMENT OF THE PROPOSED DEVELOPMENT

Introduction

3.1. This section of the Planning Statement sets out an assessment of the proposals against the relevant planning policy framework and any other relevant guidance or material considerations.

3.2. It was established in the pre-application response from Somerset Council (ref 2022/2486/L4PA, page 2) under the subheading *Assessment of Main Issues* that the key planning considerations relevant to the proposals are:

- Sustaining and enhancing the significance of West Bradley House and ensuring its conservation; and
- The proposed development would amount to refurbishment of the existing house and provision of new development ancillary to the main dwelling.

3.3. It is agreed that the above points set out by Somerset Council are the key planning considerations engaged, and these are assessed below together with a range of secondary planning considerations that are also important to consider and demonstrate compliance with the relevant policy requirements.

3.4. The assessment is structured accordingly around the following planning themes:

- Principle of Development
- Design
- Heritage
- Landscape
- Flood Risk and Drainage
- Nutrient Neutrality
- Ecology and BNG
- Arboriculture
- Access and Highways

Principle of development

Policy

3.5. Local Plan policy CP1 *Mendip Spatial Strategy* sets out a spatial hierarchy for the location of new development, within which the Site falls in 1.b(iii) '*other villages and hamlets*', where development may be permitted in line with the provisions of Core Policy 4. In terms of housing, CP1 and Local Plan policy CP4 *Sustaining Rural Communities* are focused on provision of *new housing* and are silent on the improvement and upgrading of existing housing.

Assessment

3.6. At the most strategic level of considering *sustainable development* which is at the heart of planning policy as set out in the National Planning Policy Framework ("the NPPF"), the proposals seek to make efficient use of land, protect and enhance the natural, built and historic environment, and foster a well-designed and beautiful place (NPPF para 9).

3.7. The proposals engage an existing listed dwelling house, immediately adjacent redundant agricultural buildings and a modern domestic garage, and propose their replacement / conversion to uses ancillary to and in support of the existing dwellinghouse at the Site. No new residential units are proposed. The core guiding principles are:

- Enhance the setting of the Grade II* listed dwelling through replacement of modern poor quality immediately adjacent redundant buildings, and refurbishment and conservation of the one good quality barn;
- Provide ancillary living, bedroom, staff, leisure and car storage space to support the continued future use of the Grade II* listed dwelling as a family country house, suitable for entertaining and enjoyment.

3.8. Section 13.1 of the DAS provides a plan that illustrates clearly the existing and proposed uses and their locations and extent. The nature of the accommodation proposed at the Site can be summarised as follows:

- West Bradley House / replacement link building / converted Apple Barn (demolition of adjoining modern Concrete Barn) – main dwellinghouse – with additional living space provided within the Apple Barn to accommodate

modern domestic spatial requirements that are impossible to provide within the listed building;

- Cart Shed – replacement of existing agricultural building with new building to provide 5 bedroom suites as ancillary bedrooms to West Bradley House for guests / family visits etc.;
- Leisure Barn – replacement of existing agricultural building with new building to provide domestic pool / gym / leisure facilities and covered eating area;
- Garage – replacement of existing garage with new three bay garage with integral refuse / recycling store and cycle storage;
- The Little Stone Barn – conversion of building to staff accommodation (nanny annexe) and replacement of existing side lean-to extension – to provide a one-bedroom staff flat associated with and linked to West Bradley House.

3.9. As confirmed in the pre-application advice from Somerset Council regarding the principle of development:

- There is no local plan or national policy that restricts the loss of agricultural floorspace;
- Development of ancillary residential use is acceptable in principle;
- In order to be considered ancillary a fact and degree assessment of the proposed ancillary use needs to be carried out;
- 330sqm of new ancillary floorspace would comprise a swimming pool and gym – this is considered ancillary (and could also readily be considered incidental);
- 172sqm would comprise five guest suites – this includes only bedrooms and bathrooms and no cooking facilities, and there is also no living space or private amenity space associated. Planning permission would be required for any change to independent dwelling(s). This element is therefore considered ancillary;
- A 3 car garage with integral cycle and bin store of 67.5sqm is commonplace for a dwelling of this size and would be considered incidental to the dwelling;
- Conversion of the existing Little Stone Barn (51sqm) to provide staff accommodation would make good use of a redundant rural building, and provision of an annexe for staff at a rural country house is considered appropriate to meet the reasonable needs of the occupants;

- Subservience in scale to the host dwelling can also be a relevant factor in considering whether ancillary accommodation is in fact ancillary. Whilst the floorspace and volume of ancillary accommodation is sizeable in relation to the host dwelling, the scale of the existing redundant buildings at the Site and the need to ensure the conservation, enhancement and continued viable use of the heritage assets on site need to be taken into account.

3.10. Taken together, the proposals for replacement and refurbished buildings, and reinstated / repaired landscape represent a comprehensive and cohesive approach to undoing the harm caused by a century of the orchard business development at the Site, and will return it to a fine country house set in grounds, well served by ancillary accommodation necessary for modern living. The investment in the house and associated ancillary accommodation will secure the long-term future use of the listed building as a desirable country house.

3.11. The principle of development is therefore sound and logical, and represents a high quality and sustainable approach to addressing the unique circumstances presented today by this Site, in the spirit of the NPPF and Local Plan policies, and without conflict with any specific policies or guidance.

3.12. As confirmed in the pre-application advice from Somerset Council '*the proposed ancillary uses and amount of development is considered broadly acceptable in principle, subject to the proposed development being considered acceptable in heritage terms.*'

Design

Policy

3.13. NPPF Section 12 Achieving well-designed and beautiful places outlines how the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

3.14. Local Plan policy DP1 Local Identity and Distinctiveness states that all development proposals should contribute positively to the maintenance and enhancement of local identity and distinctiveness across the district. Proposals should be formulated with an appreciation of the built and natural context of their locality. Local Plan policy DP7 Design and Amenity of New Development outlines

that the Local Planning Authority will support high quality design which results in usable, durable, adaptable, sustainable and attractive places. Proposals for new development should demonstrate that they are of a scale, mass, form and layout appropriate to the local context, and protect the amenity of users of neighbouring buildings and land uses and provide a satisfactory environment for current and future occupants.

3.15. Further guidance upon meeting the policy DP7 requirements is set out in the *Design and Amenity of New Development SPD (March 2022)*.

Assessment

3.16. The DAS prepared by Richard Parr Associates sets out in detail how the proposals have been formulated in response to site-specific analysis of the built and natural environment both within and adjacent to the Site, and an awareness of the wider area in terms of the established vernacular and cultural heritage of townscape and landscape in the area. The proposals are also intimately concerned with preserving and enhancing the heritage significance of the Grade II* listed West Bradley House and its setting, whilst ensuring that accommodation is provided that can meet the requirements of modern country house living to ensure that the house remains attractive, functional and viable in its original and intended use.

3.17. A summary of the key design considerations and attributes of the proposals have been extracted from the DAS and are set out below (with references to DAS paragraphs / sections) to demonstrate how the objectives and requirements of the relevant policies are met:

- The 'Mission Statement' at 1.1 sets out the ambition to remove layers of harmful development, appropriately conserve the main house, and add new elements of high-quality design to the secure the future use of the property;
- An analysis of the positive and negative contributions to the principal heritage asset and its setting are set out at 4.2;
- Section 6.0 sets out how the main house will be conserved with relocation of the staircase back to its original location, modest internal reconfiguration, and replacement of the later incongruous roof with an appropriate roof form;

- Section 7.0 sets out how the northern extensions to the house will be reconfigured and replaced to a similar scale using appropriate design and materials;
- Section 8.0 sets out how the opportunity to remove the large concrete barn obscuring the south elevation of the historic Apple Barn and views to and from Bradley House is taken, together with a sensitive scheme for conversion of the Apple Barn to ancillary residential use;
- Section 9.0 sets out how the Little Stone Barn will be appropriately conserved and converted into staff accommodation use, with the design having been the subject of careful consideration and option testing through two rounds of pre-application enquiry;
- Section 10.0 sets out how the Cart Shed is a single storey building replicating the scale and footprint of the existing poor quality building, with a proposed design referencing the agricultural tradition, using timber, metal and glass, with a rhythm of expressed timber posts on the south elevation echoing the bays of the original cart shed;
- Section 11.0 sets out how the Leisure Barn follows the footprint of the existing large scale modern buildings to be replaced, with a L-shaped plan to provide closure of the main courtyard, taking a traditional agricultural building form and material palette of metal cladding and corrugated roof form to remain familiar and subservient within the overall composition;
- Section 12.0 sets out how the Garage is located to close the courtyard space at the western end, and is of traditional appearance with stone gables, timber doors and a pantile roof.

3.18. Scale and massing of the proposals are examined and illustrated in sections 13.2 and 13.3 of the DAS, with 3d modelling and section drawings confirming that the proposals for replacement buildings take their maximum scale from the existing, and that the main dwelling will remain discernibly and appropriately prominent / dominant in the scheme.

3.19. Further details and references for the materials proposed, using natural and locally sourced materials as a priority are provided in section 13.5.

3.20. Sustainable Construction and Design measures incorporated into the design of the proposed development are set out in DAS section 13.8, and follow the energy

hierarchy. An *Energy Statement* by p3r Engineers is including in the submission and confirms that the measures incorporated in the design will achieve:

- 8% reduction in CO2 emissions over the minimum requirement due to passive design features;
- A further 49.4% CO2 emission reduction achieved using air and ground sourced heat pumps;
- Total CO2 reduction of 57.4% for Part L 2021 on the new build elements;
- 83.3% reduction in CO2 emissions for existing buildings to be renovated, as a result of improvements to thermal insulation, low energy lighting, and use of heat pumps

3.21. Overall in terms of design, the refurbished and new elements reflect and promote local distinctiveness in terms of their form and materiality. In terms of scale and layout, the proposals result in an overall reduction in both footprint and floor area upon the Site from that existing. The design of the proposed buildings will read as being predominantly traditional in character with modern elements and would reflect local distinctiveness in the sense that they represent a continuation of the strong tradition in the area of simple built forms being set within the landscape in a pure and simple manner – as was the original intention when West Bradley House was built.

3.22. The proposals are therefore considered to fully meet the objectives and requirements of the NPPF and Local Plan in relation to design, and will demonstrably achieve high quality design which results in a usable, durable, adaptable, sustainable and attractive built environment that is appropriate to context.

Landscape

Policy

3.23. Local Plan Policy DP4 *Mendip's Landscapes* identifies that the Mendip district is defined by its landscapes. Proposals for development that would, individually or cumulatively, significantly degrade the quality of the local landscape will not be supported. Any decision-making will take into account efforts made by applicants to avoid, minimise and/or mitigate negative impacts and the need for the proposal to take place in that location.

Assessment

3.24. The Site is not located within any designated landscape area, and falls within the Mid Somerset Hills National Character Area. Landscape input has been provided to the project by Urquhart & Hunt, working closely with project ecology consultants Engain.

3.25. The *Landscape Guidelines* report prepared by Urquhart & Hunt together with the proposed landscape masterplan drawing for the Site set out the how the landscape at West Bradley House will be enhanced in ecological and aesthetic value, providing a diverse and attractive setting working in harmony with the environment, including increasing natural drainage where possible.

3.26. The key elements of the landscape proposals include:

- New main access driveway providing a picturesque arrival with the house revealed gradually through the landscape;
- Increased vegetation to Bradley Brook to reinforce and preserve the stream habitat;
- Re-location of tennis court to north of Bradley Brook to enhance the immediate setting and arrival to the house, with new footbridge to provide access;
- Provision for visitor / guest parking to north of Bradley Brook, to prevent cars from dominating the immediate setting of the house;
- New planted courtyard to the north-east of the house, providing connectivity to the ancillary buildings that support the house;
- Replacement of terrace area around the main house, with links provided to other hard landscape areas including the new lower terrace to the south of the Apple Barn;
- New garden planting to the main house;
- New pond to the east of the Leisure Barn as part of the overall SUDS strategy;
- Extensive new tree planting to reinforce the existing structuring features of the landscape at the Site

3.27. These proposals for the landscape within the Site represent a significant enhancement to the current barren post-agricultural hard and soft landscape,

and will achieve localised enhancement including to the setting of the listed building.

3.28. The scale of the proposed replacement buildings and the alterations to West Bradley House itself are modest in relation to the existing and established development at the Site, and will not adversely impact upon the role of the Site within the wider landscape. A limited number of local public views into the Site are available and have been assessed in sections 13.6 and 13.7 of the DAS, where it is demonstrated that the proposals will have a minor and positive impact on visual amenity.

3.29. The carefully considered enhancements to the landscape at the Site, together with the sensitive and appropriate design of new buildings and alterations to existing, will not impact adversely on landscape character or visual amenity, and will secure notable localised landscape enhancement, integrated with ecological and drainage considerations, and will therefore meet the objectives and requirements of policy DP4, whilst also enhancing the setting of the listed building.

Heritage

Policy

3.30. Relevant policy in relation to heritage, design and landscape matters is set out in the NPPF section 16 and Local Plan policy DP3, and requires heritage assets to be conserved in a manner appropriate to their significance, with great weight in decision making being given to the asset's conservation.

3.31. The Planning Practice Guidance usefully defines *conservation* as:

“Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets...”
(Paragraph: 002 Reference ID: 18a-002-20190723)

3.32. NPPF paragraph 203 sets out how decision making upon applications should take into account the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their

conservation, and the desirability of new development making a positive contribution to local character and distinctiveness. Para 212 encourages looking for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance.

Assessment

3.33. The proposals have been formulated with specialist input from appropriately qualified heritage specialists, and the submission includes an *Archaeology Appraisal* by BSA Heritage and a *Heritage Appraisal* prepared by Justin Ayton.

3.34. As detailed in section 3.1 of the DAS, the proposals have also been the subject of extensive pre-application engagement with officers of Somerset Council and Historic England in relation to built heritage matters. This has been a long but productive process, and has usefully guided the project team through further investigation (including intrusive investigations), assessment of further options, and formulation of modified proposals in relation to the main house, Apple Barn, and Little Stone Barn. This process culminated in February 2024 with a final, supportive, advice letter from Historic England. Whilst no final pre-application written advice has been received from Somerset Council to date, support for the final proposals in principle was provided at the last pre-application meeting.

3.35. A summary is provided here for planning assessment purposes of the key aspects of the proposals in heritage terms, and how the relevant policy and statutory requirements are met.

Archaeology

3.36. In the first pre-application response from Somerset Council consultee advice from South West Heritage Trust was provided with regard to archaeological interest of the Site, and recommended that an archaeological desk-based assessment (DBA) be carried out. This has been undertaken and an *Archaeology Appraisal* by BSA Heritage is provided as part of the present submission.

3.37. The BSA Heritage report finds that the Site has relatively low archaeological potential, and the proposals will also have a limited impact as the siting of new buildings and swimming pool are within the footprints of existing structures, the relocated tennis court would have a superficial impact, and new planting would

be located in areas of existing or earlier planting. It is concluded that further archaeological requirements could be limited to a watching brief during construction, with submission of a WSI for such work secured by planning condition.

Built heritage

3.38. The proposals have been carefully formulated to enhance the overall character of the Site and the setting of the listed building through:

- replacement of poor quality harmful buildings that are redundant with high quality new buildings that contribute positively to local character and distinctiveness, and will support the future continued residential use of the listed building;
- refurbishment and re-use of buildings of some historic interest that contribute positively to setting, to enhance that contribution to significance;
- reconfiguration of the immediate landscape, to return towards the historic arrangement giving greater focus to the house upon arrival.

3.39. The proposals will also preserve the significance of the listed building through appropriate works of alteration and extension, and will ensure its continued viable future residential use through addition of the associated ancillary accommodation.

3.40. The following key aspects of the proposals, explored in detail in the *DAS* and *Heritage Appraisal* are noteworthy in seeking to remedy this last century of harmful change at the Site:

- The current proposal to refurbish the house and its outbuildings to create a 21st century country house for a family represents the next step in the long-established tradition of adaptation of this house;
- The proposals have evolved from detailed assessment of the evolution and significance of the house and its outbuildings, and seeks to respect, preserve and enhance elements and phases of greater significance, whilst concentrating works on those areas of lower significance or previous harmful works;

- Within the main house, the palimpsest of overlaying phases is generally respected and preserved, whilst the 19th century staircase is relocated to enhance and better reveal fireplaces and the fine early 18th century stair window, and evoke a key element of the historic plan-form and vertical circulation of the building, enhancing significance;
- The 19th century roof and chimneys – in poor condition and in need of reconstruction – are of limited interest and poor in appearance, failing to respond to the complex geometric form of the building and visually dominating it. The roof is to be replaced a new roof form sympathetically designed to complement and enhance the architectural character and geometric form and considerable significance of the original building;
- Alterations and replacement of some later additions to the north of the house will remove visual clutter and provide a discrete contemporary link to the Apple Barn ancillary living accommodation;
- The removal of the Concrete Barn attached to the Apple Barn will considerably enhance the setting of the house, whilst the Apple Barn structure will be retained and modern fittings / partitions removed. New openings to the south elevation of the Apple Barn are required in order to make the deep plan habitable, and are primarily on the garden / south elevation so that from the yard (north) the building retains a characteristic agricultural appearance;
- The Agricultural Barns and Cart Shed to be replaced are assessed as being of no significance and their removal would not harm the setting of West Bradley House;
- The Little Stone Barn is the oldest of the ancillary structures and is to be retained and converted into a staff annexe. The structural condition of the roof requires replacement and a ring beam is proposed at upper level to stabilise the building. A discrete slot window is proposed beneath the eaves to provide natural lighting.

3.41. The *Heritage Appraisal* concludes that the current proposal would comprise a sensitive and coherent new phase to the already multi-phased site. In accordance with Historic England guidance in Conservation Principles the significance of the place has been assessed and the proposed new works carefully designed to impact upon areas of limited significance, where this would reinforce and further reveal the values of the Site. Consequently, the proposal

would preserve and enhance the special interest of the listed building, sustaining and further revealing its significance and the ability to appreciate that significance. As such the proposals would accord with the NPPF and Local Plan policy DP3, and in supporting the proposals the Local Planning Authority can be confident that the statutory requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 are fully satisfied.

Flood risk and Drainage

Policy

- 3.42. NPPF Section 14 *Meeting the challenge of climate change, flooding and coastal change* sets out how major developments should incorporate sustainable drainage systems and where possible, provide multifunctional benefits.
- 3.43. Local Plan Policy DP23 *Managing Flood Risk* requires that development follows a sequential approach to flood risk management, giving priority to the development of site with the lowest risk of flooding. It goes on to set out how all development will also be expected to incorporate water management measures to reduce surface water run-off which should include the use of SUDS.

Assessment

- 3.44. The proposals for the Site have been prepared with specialist advice upon flood risk and drainage matters by Hydrock consulting engineers, and have incorporated advice provided by the LLFA at pre-application stage. Hydrock has prepared *Flood Risk Assessment* and *Drainage Strategy* reports that are submitted in support of the applications.
- 3.45. As the Site is greater in size than 1ha a flood risk assessment is required.
- 3.46. The *Flood Risk Assessment* confirms that the Site falls within Flood Zone 1 and according to the *Recorded Flood Outlines* dataset provided by the EA falls wholly outside of the extents of historic fluvial flood events. The Site is concluded to be at 'low' risk of fluvial flooding from Main Rivers and 'negligible' risk of tidal flooding. In terms of surface water flooding, the majority of the Site falls within 'low' risk, whilst areas representative of Bradley Brook, Lower Pond, and the

Upper and Lower Canal fall within 'high' risk. Detailed assessment provided within the FRA confirms however that 1 in 1000yr surface water flood extents would be confined within the Bradley Brook channel and not cause flooding at the Site.

- 3.47. Groundwater flood risk is assessed as 'medium' at the Site and therefore preventative measures to reduce the probability of seepage during construction are recommended. Infrastructure failure flood risk at the Site is assessed as 'low'.
- 3.48. Reference to the NPPG *Flood Risk Vulnerability and Flood Zone Compatibility Matrix* indicates that the 'more vulnerable' development proposed is compatible with the Flood Zone 1 status of the site, and no Exception Test is required.
- 3.49. Mitigation measures are recommended within regard to the Cart Shed building as, whilst the finished floor level proposed is above the potential 30.00m AOD flood level of the channel, it is not possible to incorporate the typical recommendation for sleeping accommodation to be 600mm above the potential flood level. Therefore resilient materials are proposed to be used where possible up to 600mm above the finished floor level at the Cart Shed.
- 3.50. The FRA concludes that the proposed development is suitable in location when mitigation measures are considered, will be flood resistant and resilient, will not increase flood risk elsewhere or put additional persons at risk of flooding and will put in place measures to ensure that surface water is appropriately managed, thus meeting the relevant requirements of the NPPF and Local Plan.
- 3.51. The *Drainage Strategy Report* by Hydrock examines the existing situation at the Site and confirms (through drainage survey undertaken July 2023) that all foul drainage is directed to Bradley Brook. The proposals incorporate a comprehensive drainage strategy which includes:
- A new treatment plant for foul water, located to the north of the Apple Barn, with discharge of clean water to Bradley Brook;
 - Dedicated pool backwash network and chlorine separation tank, to be emptied by vacuum tank periodically;
 - Surface water drainage following application of the drainage hierarchy, with infiltration discounted due to ground conditions, discharge to the pond not possible due to insufficient capacity, and discharge to Bradley Brook selected;

- Incorporation of a range of SUDS features;

3.52. The report concludes that storm water discharge to Bradley Brook at a restricted rate of 2.4 l/s to mimic existing greenfield runoff will be achieved, and a range of SUDS features to improve water quality, amenity, and provide attenuation for storm events up to 1 in 100yrs + 40% CC will be secured. As such, the proposals are considered to meet the NPPF requirements and those of Policy DP23 of the Local Plan, and provide the required information as set out by the LLFA at pre-application stage.

Nutrient Neutrality

Policy

3.53. The Site is located within the catchment area of the Somerset Levels and Moors Ramsar site, which has been identified to be in unfavourable status due to phosphate loading. Proposals for new dwellings, amongst other types of development, are required to demonstrate nutrient neutrality in relation to phosphates from foul drainage entering watercourses.

Assessment

3.54. The proposals relate to the provision of ancillary accommodation, including a staff annexe, to an existing dwelling house. Guidance set out by Somerset Council in the *Nutrient Neutrality in Somerset: Guidance for Applicants (Sept 2023)* document identifies at section 2.2.1 that only 'new residential units' are affected by the requirements for nutrient neutrality. As no net additional independent residential unit is proposed (there will remain just one C3 single dwelling house – West Bradley House), and therefore we believe the proposals can be 'screened out' from the requirement for assessment.

3.55. Without prejudice to the argument above that the proposals are not required to achieve nutrient neutrality, as new foul drainage infrastructure is required at the Site to replace the unacceptable current system of untreated direct discharge, an assessment of the existing and proposed nutrients position has been undertaken by Hydrock and is reported in Appendix H of the Drainage Strategy Report.

3.56. The assessment makes use of the Somerset Nutrients Calculator tool available on the Somerset Council website, and demonstrates that as a result of the introduction of the proposed new foul water treatment plant at the Site the proposals will result in a reduction of phosphates from the existing situation and therefore goes beyond nutrient neutrality to achieve betterment. Achievement a reduction in nutrient loading to the local watercourse is an important benefit of the proposed development that is a material planning consideration and weighs in favour of the scheme.

Ecology and BNG

Policy

3.57. NPPF Section 15 *Conserving and enhancing the natural environment* sets out how development should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

3.58. Local Plan Policy DP5 *Biodiversity and Ecological Networks* requires that development proposals must ensure the protection, conservation and, where possible, enhancement of designated natural habitat areas and species. Proposals with the potential to cause adverse impacts on protected or priority species or habitats will be resisted, unless the impacts can be reasonably avoided, compensation for the impacts can be secured, or other considerations of public interest clearly outweigh the impacts.

3.59. The Environment Act 2021 inserted Schedule 7A into the Town and Country Planning Act 1990, requiring certain developments to deliver Biodiversity Net Gain (BNG) of 10%. The proposals at West Bradley House do not fall within any of the exemptions set out in the legislation and therefore 10% BNG is required.

Assessment

3.60. The proposals have been informed by professional ecology input from the earliest stages, with Greena Ecological Consultancy providing a *Preliminary Ecological Investigation Report* and *Stage II Bat Activity Surveys*, and then Engain further advising upon the proposals and providing a comprehensive

Ecological Impact Assessment and Biodiversity Report. A Construction Ecological Management Plan (CEMP) is also submitted as part of the planning application.

3.61. The Engain report provides a comprehensive assessment of the Ecological Baseline of the Site, summarised in Table 2 of the report. It goes on to examine the elements of the proposals that have potential to impact adversely on habitats or species, summarised in Table 3, and potential impacts without avoidance, mitigation or compensation in Table 4. This identifies potential impacts upon Bradley Brook, amphibians, birds, bat roosts, commuting / foraging habit for bats, badger setts and reptiles.

3.62. Avoidance, mitigation and compensation for potential impacts have been adequately incorporated into the proposals, following that sequential approach, as detailed in Section 5 of the Engain report. This includes:

- Modification of proposals for improved access to avoid the need for a new bridge, avoiding potential impacts on the brook habitat;
- Incorporation of pollution prevention measures to avoid pollution of the brook (set out in CEMP);
- Avoidance of harm to amphibians and reptiles during construction through phased vegetation clearance, dismantling of refugia, and construction practices (set out in CEMP);
- Avoidance of harm to nesting birds through pre-works inspection (set out in CEMP);
- Avoidance of harm to badgers through pre-works inspection and if necessary temporary licensed exclusion (set out in CEMP);
- Avoidance of harm to bats and compensation for roost loss, through a comprehensive mitigation strategy including replacement bat roost in the new garage implemented under a Natural England Bat Mitigation Licence;
- Avoidance and mitigation of effect of light spill through new planting to the brook corridor;

3.63. The Engain report summarises at 5.25-5.27 that following the application of the measures set out the ecological effect is reduced from a local level to less than a Site level and is not significant beyond a localised area of the Site.

- 3.64. BNG is secured through the carefully formulated landscape proposals for the Site, as assessed in Section 6 of the Engain report and the full BNG metric provided. The net gains are primarily achieved through enhancing grassland, enhancing retained scrub, extensive tree planting and removal of invasive species from the banks of the brook. The BNG results are +16.55% habitat units and +10.24% watercourse units, meeting and exceeding the 10% gain mandatory requirement.
- 3.65. The Engain report concludes that on balance the proposals are overwhelmingly positive in ecological impact and thus they are compliant with relevant policy and legislation, including the NPPF requirement for the enhancement of biodiversity, the statutory requirement for 10% BNG, the protection of wildlife covered by *The Wildlife and Countryside Act 1981* (as amended), the Habitats Regulations and Local Plan policy DP5.

Arboriculture

Policy

- 3.66. Local Plan Policy DP1 *Local Identity and Distinctiveness* states that all development proposals should contribute positively to the maintenance and enhancement of local identity and distinctiveness across the district. Proposals should be formulated with an appreciation of the built and natural context of their locality. Where a development proposal would adversely affect or result in the loss of features or scenes recognised as being distinctive, the Council will balance up the significance of the feature or scene to the locality, the degree of impact the proposal would have upon it, and the wider benefits which would arise from the proposal if it were approved. Any decisions will also take into account efforts made by the applicant to viably preserve the feature, avoid, minimise and/or mitigate negative effects and the need for the proposal to take place in that location.

Assessment

- 3.67. Arboricultural advice has been provided to the design team by Bosky Trees from the earliest stages of the design process, to ensure that arboricultural considerations have been fully taken into account in shaping the proposals. An *Arboricultural Impact Assessment and Tree Protection Plan* is provided by Bosky

Trees as part of the applications submitted, and the findings of the report are summarised below:

- 57 individual trees are to be removed in association with the development – and it should be noted that most of the trees to be removed are a forestry plantation of black walnut trees;
- A section of young hazel and cherry laurel hedge is also to be removed;
- The proposed removals are not prominent in the local area and their loss will not have a significant impact on the character or appearance of the village;
- The loss will be compensated by new planting of 99 trees of various sizes to provide age and species diversity – including large tree stock to form new avenue planting to the new access drive, and new tree planting around the house and gardens;
- Tree protection measures for retained trees during the construction process are set out;
- Removal of the old driveway surface near T35 and T36 will need to be carried out under arboricultural supervision;
- Any unforeseen construction activity within the root protection area of retained trees at or near the site will require arboricultural supervision.

3.68. The Bosky Trees report concludes at para 4.1.2 that the proposed development will have an acceptable impact on local tree cover. This meets the relevant objectives and requirements of Local Plan policy DP1 set out above.

Access and Highways

Policy

3.69. NPPF section 9 *Promoting sustainable* transport sets out how the planning system should actively manage development to promote sustainable travel choices, but recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. Paragraph 114 sets out how specific applications for development should take up appropriate opportunities to promote sustainable transport modes given the type of development and location, provide safe and suitable access for all users, design streets and parking in line with national guidance, and ensure that any significant impacts on the transport network are mitigated to an acceptable degree. Paragraph 115

states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 3.70. Local Plan policy DP9 *Transport Impact of New Development* requires that, where appropriate, development proposals must demonstrate how they will improve or maximise the use of sustainable forms of transport, and how proposals should make safe and satisfactory provision for access.

Assessment

- 3.71. Pell Frischmann have advised on highways matters during the formulation of the proposals and an *Access Review* report is provided, including visibility splay drawings, as part of the applications.

- 3.72. There are currently two main vehicle access points to the Site – the Farm Drive and House Drive – both from Bradley Lane to the west of the house. The Farm Drive was used to access the orchards, and connects internally to the house area via a bridge over Bradley Brook. The existing junction with the public highway for the House Drive has very restricted visibility to the right upon exit, due to the presence of a building (farm building converted to offices) fronting the carriageway edge and made further challenging by a sharp bend beyond. Whilst vehicles speeds are low, the exit from the house is dangerous.

- 3.73. The proposals relocate the House Drive and its junction to Bradley Lane to achieve increased visibility and highway safety, as detailed in the Pell Frischmann report. An existing field gate access is to be re-purposed as the main House Drive entrance, and as well as achieving improved visibility and safety, will also create a picturesque approach through the landscape, where the house is glimpsed and then fully revealed. A passing place is provided near to the junction as requested in the pre-application advice from Somerset Council. The drive splits on approach to the house to provide a service spur to the yards area whilst the main drive continues to provide a formal front access to the house. Refuse / recycling collection would be from the roadside as existing, but relocated to the new entrance.

- 3.74. An earlier proposal at pre-application stage to use the Farm Drive as the main access was abandoned as it required a new bridge across Bradley Brook which

proved complex in terms of arboricultural and ecological impacts. The proposal is to close the house drive and re-purpose the now redundant farm drive to the north as the main house drive.

3.75. These proposed access adjustments will secure important road safety benefits and will also improve the arrival experience for the occupants. The *Access Review* report quantifies the safety benefits of the new access and sets out how the visibility splay to the west is improved by 12.2m and to the east by 21m. It is also noted that the trip generation of the proposed wholly residential use will be lower than the historic volume of traffic that used the Site associated with the existing lawful uses.

3.76. The proposed site plan sets out how ample parking space for the occupants and guests is proposed, with three spaces within a new garage building and further spaces for guests in the yard across the existing bridge. EV charging points will be provided to meet SCC standards. Parking and servicing is focused to the north of the main house to minimise the impact of vehicles upon the setting of the listed building and its relationship with the immediate landscape. Adequate storage provision is made for refuse and recycling, and cycle storage.

3.77. As the proposals will appropriately provide for its transport requirements, and will secure improvements to road safety at the point of access, they meet the objectives and requirements of NPPF policy and Local Plan policy DP9 in relation to transport.

4. CONCLUSION

- 4.1. The proposals set out in the applications for planning permission and listed building consent will result in a high-quality development that appropriately conserves the Grade II* listed dwelling, provides an enhanced living environment and ancillary accommodation for the occupants, while respecting the local context and character of the area.
- 4.2. A great opportunity is presented in these applications for significant investment in the Site to deliver positive change that meets the objectives and requirements of planning policies at all levels and represents high-quality sustainable development.
- 4.3. The proposals not only deliver primary heritage benefits in securing appropriate conservation of the Grade II* listed building and its continued optimum viable use as a fine country house, but will also enhance the built environment and landscape setting of the house, provide a new safer vehicle access, and deliver notable biodiversity net gain beyond the mandatory 10%.
- 4.4. It has taken 18 months of pre-application discussions with Somerset Council and Historic England to inform and shape the proposals that could gain support, and we are grateful for that rigorous process. Having also gained the clear support of the local community in pre-application discussions, and with proposals that demonstrably accord with the Local Plan and NPPF, we believe that Somerset Council can grant planning permission and listed building consent to allow the proposals to move forward without delay.