



## CONSERVATION CASEWORK LOG NOTES AUGUST 2018

The GT conservation team received 173 new cases in England and two cases in Wales during July, in addition to ongoing work on previously logged cases. Written responses were submitted by the GT and/or CGTs for the following cases. In addition to the responses below, 24 'No Comment' responses were lodged by the GT and three by CGTs in response to planning applications included in the weekly lists. The list also includes responses to some cases made by other like-minded organisations, with whom we keep in close contact.

SITE	COUNTY	GT REF	GRADE	PROPOSAL	WRITTEN RESPONSE
Eton College	Berkshire	E18/0528	II	PLANNING APPLICATION Construction of a new school sports centre comprising a 9-court sports hall capable of offering multipurpose indoor sports, x8 squash courts, general fitness spaces, an athlete development programme space including a sprint track, dojo space, physio spaces, classrooms and offices for PE staff and students, a triple height climbing wall space, rifle range and associated plant, storage, WC and changing facilities. Construction of a new Eton Sports and Aquatics Centre comprising a 25m pool with movable floor	<b>CGT WRITTEN RESPONSE 10.08.2018</b> I am writing on behalf of the Berkshire Gardens Trust in response to the Consultation concerning the Application by Eton College, numbered as above. The Berkshire Gardens Trust is affiliated to the Gardens Trust which is a statutory consultee in planning matters where the application may impact on a registered park or garden. The Gardens Trust refers applications in the six Unitary Authorities in Berkshire to us for our observations and for us to respond on behalf of the Gardens Trust. Garden Trusts are established in every County in England and Wales, and although they are independent of each other they share a common purpose to protect the historic gardens of their County so they may be shared with future generations. Their purpose is fulfilled by education of their members and more generally, by research into important historic and contemporary gardens and by considering planning applications and assisting Local Planning Authorities to protect the setting of such gardens. Eton College has a number of gardens of historic importance, including

				<p>suitable for swimming, water polo and teaching use, a 4-court sports hall capable of offering multi-purpose indoor sports and exam use, changing facilities, a spectator area at first floor level which also provides a meet-up space and refreshment point for post-match use, associated plant and storage provision, associated car and coach parking and new access track off Slough Road. Refurbishment and extension of the rackets courts building to provide a new clubroom, viewing gallery and extended changing facilities. Refurbishment of the jacks building to provide a fives clubroom and changing facilities. Refurbishment of fives courts, a new printmaking pavilion to house historic printing presses adjacent to Caxton Schools, following demolition of the existing buildings comprising the gymnasium, indoor swimming pool and the outdoor swimming pool complex. College, Eton College, Slough Road, Eton, Windsor SL4 6DJ. EDUCATION, SPORT/LEISURE</p>	<p>the Provost's garden, the Fellows' garden and Luxmore Island. We would object to any development which adversely affected any of these gardens or their setting. However, it does not seem to us that the application under consideration would have any impact on these historic and important gardens or their setting, and accordingly we do not wish to comment further. We do not normally make any observations on such matters as Green Belt or planning policies, or the general benefit or detriment of proposed development. We confine our views to the effect on Parks and Gardens. Thank you for consulting us. Yours sincerely, Charles Elly His Honour Charles Elly DL Chairman of the Berkshire Gardens Trust</p>
Eythrope Park	Buckinghamshire	E18/0586	II	<p>PLANNING APPLICATION Creation of a wetland complex. Eythrope Water Meadows, Eythrope, Stone, Bucks HP18 0HS. MISCELLANEOUS</p>	<p><b>TGT WRITTEN RESPONSE 13.08.2018</b> Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. We have liaised with our colleagues in the</p>

					<p>Buckinghamshire Gardens Trust and would be grateful if you could please take our comments below into consideration when deciding this application.</p> <p>We have reviewed this application and note that the proposed site is just outside of the Registered Park and Garden. Therefore we have no comment to make. However, we note that there appears to be significant archaeology on the site, identifiably in the form of a moat, but possibly more and therefore we hope that the County Archaeologist has been consulted on this matter.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Waddesdon Manor	Buckinghamshire	E18/0617	I	<p>PLANNING APPLICATION Erection of detached car port. Gardens House, Queen Street, Waddesdon, Buckinghamshire HP18 0JW.</p> <p>MAINTENANCE/STORAGE/OUTBUILDING</p>	<p><b>TGT WRITTEN RESPONSE 13.08.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and would offer these comments.</p> <p>We have reviewed this application for a new detached car park adjacent to Gardens House which sits within the Registered Park and Garden (RPG) of Waddesdon Manor. These timber ‘cartshed’ type garages seem to have become the preferred ‘heritage’ solution for such parking arrangements, often without particular consideration as to whether or not this style is appropriate for the house. In this instance, anything more substantial would be more permanent and may have a greater impact. We would prefer that no garage was constructed, but acknowledge that this design does not damage the significance of the RPG any more than having cars already parked in front of the house. We therefore merely offer this as a comment for your officers to bear in mind when considering this application.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Eythrope Park	Buckinghamshire	E18/0632	II	<p>PLANNING APPLICATION Outline Application with access to be</p>	<p><b>TGT WRITTEN RESPONSE 13.08.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory</p>

				<p>considered and all other matters reserved for a residential development of 120 dwellings and formation of new access. Land To The West Of Eythrope Road, Stone, Buckinghamshire. RESIDENTIAL</p>	<p>Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and would ask that you take the following comments into consideration when deciding this application. We have reviewed this application and note that, whilst the application site is outside of the Registered Park and Garden (RPG), there will undoubtedly be an impact from such a substantial development less than 1km of the southern tip of the RPG. We have not been able to visit the application site and many of the documents submitted and uploaded on the AVDC planning site such as the 'Design and Access Statement' are currently unavailable to view so this is a desk-based assessment.</p> <p>The significance of a RGP is more than just the views from the buildings within it but concerns the wider setting of the landscape. We note that, in the 'Landscape and Visual Assessment Statement' it is acknowledged that "The larger, northern section is mainly open arable and pasture, with long views south and east over the park and garden (concealed from the park by mature trees) into the Vale of Aylesbury and beyond to the Chiltern Hills,' and although the application site is described as being 'over the brow', it is acknowledged that the application site may be visible hence why an additional planting scheme is being recommended.</p> <p>In 4.12 of the Landscape and Visual Assessment statement, it is acknowledged that 'the impact would be over the long term (5 + years); and the impact would, ultimately, be irreversible, and thus any impact would be permanent. There are however opportunities to offer mitigation of value as part of the scheme and the resulting approval of reserved matters application' It is acknowledged that any such mitigation attempts (planting) would take some time to settle in. In the conclusion in 6.2, this is reiterated 'The proposed development would fundamentally change the landscape character of the baseline landscape within the site from the existing area of open countryside to an area of built development, this change would be irreversible and result in a major alteration of the overall landscape character for the site and its immediate setting. '</p>
--	--	--	--	---	---

					<p>Based on the information that we can currently access, The Gardens Trust and Bucks Gardens Trust object to this application on the grounds that the development is likely to be damaging to significant views relating to the designed as well as the wider landscape.</p> <p>Yours sincerely,  Margie Hoffnung  Conservation Officer</p>
Combermere Abbey	Cheshire	E17/1037	II	<p>PLANNING APPLICATION New permanent wedding pavilion building as replacement to the temporary marquee structure in the Walled Garden at Combermere Abbey, conversion of existing ancillary structures to a catering facility and insertion of a disabled toilet into the existing Game Keeper's cottage.  COMBERMERE ABBEY,  COMBERMERE PARK DRIVE,  COMBERMERE, WHITCHURCH,  CHESHIRE SY13 4AJ.  HOTEL/HOSPITALITY</p>	<p><b>TGT WRITTEN RESPONSE 22.08.2018</b></p> <p>Thank you for contacting us regarding this case and allowing time for consideration. We have consulted with our colleagues in Cheshire Gardens Trust and respond as follows:</p> <p>We acknowledge the efforts of the owner to make the historic site sustainable and the challenges that this presents. We note the additional reports that have been produced to address issues raised in our letter.</p> <p>We also appreciate the level of detail and consideration provided in Marion Barter Associates Ltd Heritage Impact Statement which does analyse the significance of the walled kitchen garden and determines the impact of proposals on it. We accept that the impact of the proposed building on the setting of heritage assets will be low, and will have less visual impact than the temporary structure. However the marquee is a temporary structure, i.e. one that can be removed so that the garden space could be restored, whereas the proposed permanent building is likely to result in irreversible change. We consider that in the assessment too much weight is given to the temporary structure, and that, in common with other cases, too little weight is given to the space enclosed by the walls which is the walled kitchen garden. The area occupied by the proposed building may be small in relation to the whole area of the walled garden, but if permitted it will result in a significant alteration to the character of the space.</p> <p>We note that other locations for the facility have been considered and rejected and the reasons for this. We acknowledge the public benefit that the proposed building is likely to bring in sustaining the historic estate, ensuring the repair of the garden walls, and contributing to the rural economy.</p> <p>It is for Cheshire East to decide whether the proposal is contrary to</p>

					<p>Cheshire East Local Plan Strategy 2010 – 2030, 13.61 "Once lost or altered, features of the historic environment cannot be replaced", and Policy SE 7 The Historic Environment: "...The character, quality and diversity of the historic environment will be conserved and enhanced. All new development should see to avoid harm to heritage assets..."</p> <p>We are concerned that, as each application concerning walled kitchen gardens is considered on its individual merits and Cheshire East comes under pressure to permit development, these particular heritage assets are being degraded, diminished and lost at an increasing rate. The Council has a duty to guard against erosion of significance of the walled kitchen gardens in Cheshire, a cumulative impact over time as applications are considered in isolation. This situation is of great concern to us. Cheshire Gardens Trust would welcome the opportunity to discuss the matter with you and Cheshire East Conservation officers to ensure the better understanding and safeguarding of the significance of walled kitchen gardens as heritage assets, and to develop a more creative and positive approach to their conservation. I am cc'ing my colleague Barbara Moth from the Cheshire Gardens Trust into this email should you and your colleagues feel this would be helpful.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Overbecks (Sharpitor)	Devon	E18/0584	II	<p>PLANNING APPLICATION Replacement dwelling of the existing garden flat at Bar Lodge. The Garden Flat, Bar Lodge. RESIDENTIAL</p>	<p><b>CGT WRITTEN RESPONSE 20.08.2018</b></p> <p>Thank you for consulting The Devon Gardens Trust on the above application which affects the setting of Overbecks an historic designed landscape included by Historic England on the Register of Parks and Gardens of Special Historic Interest at Grade II.</p> <p>The Gardens Trust, formerly The Garden History Society, is the Statutory Consultee on development affecting all sites on the Historic England Register of Parks and Gardens of Special Historic Interest.</p> <p>The Devon Gardens Trust is a member of The Gardens Trust and acts on its behalf in responding to consultations in the County of Devon. We have considered the information on your website. It would appear that the proposal would have a less than significant affect on the historic designed landscape of Overbecks. We have no objections to the proposals.</p>

					Yours faithfully John Clark Conservation Officer
Cadhay	Devon	E18/0662	II	PLANNING APPLICATION Construction of dwelling. Three Corners, Coombelake, Ottery St Mary EX11 1NW. RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 20.08.2018</b></p> <p>Thank you for consulting The Gardens Trust on the above application which affects Cadhay, an historic designed landscape of national importance included by Historic England on the Register of Parks and Gardens of Special Historic Interest at Grade II. There are only 56 Registered sites in Devon and only 8 in East Devon on this highly selective list.</p> <p>The Gardens Trust, formerly The Garden History Society, is the Statutory Consultee on development affecting all sites on the Historic England Register. The Devon Gardens Trust is a member of The Gardens Trust and responds to consultations in the County of Devon.</p> <p>We have visited Cadhay in response to this application and have studied the planning application documents on your web site. We previously objected to an outline planning permission for the construction of a dwelling with all matters reserved at Three Corners, Coombelake, Ottery St Mary, reference 17/1930/OUT</p> <p>The current application is for a 'dormer bungalow', to be sited in a different position to the previous outline application. It would be on elevated ground between two existing dwellings, which would screen the proposed building from views from Cadhay, to some extent. However, the higher part of the roof of the proposed dwelling would still impact on the views from Cadhay. We would suggest that you negotiate a revised scheme and ask the applicant to submit revised plans for the proposed dwelling with a ridge height no higher than the existing bungalow.</p> <p>Yours faithfully John Clark Conservation Officer</p>
New Hall	Essex	E18/0618	II	PLANNING APPLICATION A Security Lodge at the main entrance, opposite Avenue Lodge. New Hall School, The Avenue, Boreham, Chelmsford	<p><b>CGT WRITTEN RESPONSE 11.08.2018</b></p> <p>I am commenting for the Essex Gardens Trust, representing The Gardens Trust. This is an application for a nursery building 42 x 10m, and a car park of about 40 places, within a walled garden associated with a grade I listed former royal palace and a grade II registered</p>

				Essex CM3 3HS. MISCELLANEOUS	landscape. The development would be behind an existing tennis court and a swimming pool which occupy the walled garden, and would be partially screened by trees. It would not impinge on views of the listed building or landscape. We have no objection to the application, but would note that the development would add to the on-going incremental erosion of the quality of the setting of these important heritage assets. David Andrews
New Hall	Essex	E18/0619	II	PLANNING APPLICATION Proposed Pre-school and Nursery Building along with associated landscaping and car park to existing maintenance yard. New Hall School, The Avenue, Boreham, Chelmsford Essex CM3 3HS. EDUCATION	<b>CGT WRITTEN RESPONSE 11.08.2018</b> I am commenting for the Essex Gardens Trust, representing The Gardens Trust. This is an application for a nursery building 42 x 10m, and a car park of about 40 places, within a walled garden associated with a grade I listed former royal palace and a grade II registered landscape. The development would be behind an existing tennis court and a swimming pool which occupy the walled garden, and would be partially screened by trees. It would not impinge on views of the listed building or landscape. We have no objection to the application, but would note that the development would add to the on-going incremental erosion of the quality of the setting of these important heritage assets. David Andrews
Coopersale House	Essex	E18/0646	II	PLANNING APPLICATION and Grade II Listed Building Consent A new residential dwelling along with the demolition of derelict glasshouse structures and alterations to the historic garden wall. Land to the rear of The Stables and The Dairy, Houbbons Hill, Coopersale, Essex CM16 7QL. RESIDENTIAL, DEMOLITION, WALLED GARDEN	<b>CGT WRITTEN RESPONSE 23.08.2018</b> Coopersale House is a grade II listed building located within a grade II registered landscape, which derives its importance partly from an association with Lancelot 'Capability' Brown. To the north of the house, at the northern extremity of the registered landscape, there is a walled garden. The outline of the latter is shown on a 1758 plan for 'the new kitchen garden'. Today the garden is not planted or landscaped, the only old feature being a pond, and the wall and adjoining ancillary structures are dilapidated. This application is for a new house built on the north side of the walled garden, both within and outside the garden such that a portion of the wall would be enclosed within it. The scheme is presented as enabling development which would ensure the preservation of the wall and restoration of the garden, justifying development within the Green Belt and within the registered landscape.



					<p>The proposed design of the dwelling is carefully thought out to mitigate its impact on the heritage asset, being low, single storey with much of the accommodation and parking in a basement. However, there are serious objections to the scheme. It would be totally against Green Belt policy and would add to the on-going incremental erosion of landscape and habitat quality. The garden would become detached from both the house and the registered landscape, no longer ancillary to them, and ceasing to be legible in the wider landscape. It is easy to imagine that the focus of the development would become the house rather than the garden and historic landscape. Thus the Heritage Statement highlights the need to 'establish a well-considered relationship between the landscape setting for the dwelling and the wider rural context', in effect a re-ordering of the historic context. The application does not really explain what is so significant about the walled garden that it warrants enabling development. In relation to the guidance in the NPPF, it is not clear how it is sufficiently significant to create the 'exceptional circumstances' that might justify building in the Green Belt; nor is it clear how a restored walled garden with a £3 million house attached to it would be perceived as a public benefit outweighing any damage to the heritage asset.</p> <p>There is no detailed description of the garden wall or assessment of its date, identifying for instance what is historic and what rebuilt in more recent times. A condition survey of the wall is referred to, but seems not to be included with the application, nor is there any specification for its repair. That part of the wall enclosed within the house would be totally rebuilt because of the disruption caused by the basement, and this is likely to be the fate of much of the rest of it unless there were a detailed conservation plan or statement.</p> <p>In view of these considerations, we do not support this application. Were it to be approved, reference should be made to the recommendations in Historic England's guidance on enabling development, and there should be a condition requiring the wall to be restored before the house is occupied.</p> <p>David Andrews</p>
Owlpen Manor	Gloucestershire	E18/0587	II	PLANNING APPLICATION Erection of a covered events space in	<p><b>CGT WRITTEN RESPONSE 11.08.2018</b> Gloucestershire Garden and Landscape Trust (GGLT) has been notified</p>

				gardens adjacent to Tithe Barn wedding venue. Owlpen Manor, Owlpen, Dursley, Gloucestershire. EVENT/FUNCTION	<p>by The Garden Trust, as the Statutory Consultee for development proposals having environmental and aesthetic impacts on Listed and Registered gardens and parks; to respond on behalf of The Garden Trust.</p> <p>This proposal is supported by a very thorough analysis of its historic and aesthetic setting. On this basis the architects have derived and demonstrated a series of development options, and from these a very logical preferred scheme has been derived.</p> <p>The final proposal has the benefit of being a thoroughly contemporary and cost effective solution The building's massing, its linkage with the Listed Tithe Barn, and the choice of building materials should present an exemplar of contemporary design within a sensitive historic environment.</p> <p>Yours sincerely, David Ball (on behalf of GGLT)</p>
Westonbirt	Gloucestershire	E18/0647	I	PLANNING APPLICATION Internal refurbishment, demolition of existing carport and study, two-storey and single storey extensions, new porch, new stone boundary wall and associated landscape. Pike House, Easton Grey Road, Westonbirt, Tetbury, Gloucestershire GL8 8QE. BUILDING ALTERATION	<p><b>CGT WRITTEN RESPONSE 11.08.2018</b></p> <p>The Garden Trust has notified The Gloucestershire Garden and Landscape Trust (GGLT) to respond to this Application on its behalf. Although a substantial extension to this cottage property; so long as the quality of the materials and detailing of this scheme are maintained, and are in keeping with the character of the Conservation Area, GGLT would not wish to object to this proposal.</p> <p>Yours sincerely, David Ball (on behalf of GGLT)</p>
Dolphin Square	Greater London	E18/0755	II	PLANNING APPLICATION Part redevelopment and refurbishment of Dolphin Square including the reconfiguration of existing residential (Class C3) apartments; demolition and reconstruction of Rodney House to provide a new ground plus 9 storey building with 2 basement levels to provide residential (Class C3), serviced apartments (Class	<p><b>DOLPHIN SQUARE PRESERVATION SOCIETY WRITTEN RESPONSE 30.08.2018</b></p> <p>Dolphin Square Gardens, Pimlico, London SW1, Historic England Registered Park and Garden Status Grade II Response to revised planning submissions, August 2018</p> <p>The historic interest of a park or garden is, however, established as a material planning consideration, and the Register provides the key means by which sites of special historic interest are identified. It draws attention to the fact that the sites included should receive special consideration if changes or proposals for development are being contemplated. 1</p>

			<p>C3 temporary sleeping accommodation) , retail (Class A1-A4), leisure (Class D2); single storey rooftop extensions to the retained and refurbished Houses to provide additional residential (Class C3); new row of townhouses (Class C3) to the Western Carriageway; landscaping and new publicly accessible open space; new and reconfigured access points; and all necessary enabling works. (Revised description of development). Dolphin Square, London. RESIDENTIAL</p>	<p>1. In the light of Historic England’s listing, no modifications appear to have been made to the architectural proposals that impact on Dolphin Square gardens. If approved, this scheme would result in the destruction of the raised Spanish roof garden<sup>2</sup> and loggia, plus two of the smaller courtyard gardens including the Japanese garden, which all together comprise a fundamental and substantial part of Richard Sudell’s design for Dolphin Square Gardens.</p> <p>2. Recently submitted changes (Aug 2018) to the landscape design of the courtyard garden at Dolphin Square similarly do not reflect the significance of the Historic England listing or the national importance and rarity of this garden.</p> <p>The courtyard gardens at Dolphin Square meet the criteria for registration on the grounds of special historic interest, being a high-quality design from the interwar period, and as the work of a significant figure in the development of C20 landscape architecture. They are an important example of a landscape type, gardens to private housing estates, which have little representation on the Register, and survive largely intact. For these reasons, the courtyard gardens should be registered at Grade II.</p> <p>Sudell .... was an important theorist on landscape design, and the author of several books, of which ‘Landscape Gardening’ from 1933, received wide recognition. In this book Sudell sets out the fundamental principles of garden design, and Dolphin Square, slightly post-dating this key work, is a good reflection of his ideology. ‘Simplicity is the keynote’, overcrowding should be avoided in terms of both architectural features and plants, borders should be broad and generously treated, and lines should be simple and unbroken. Formal features should be concentrated in the area around the house, and should not be so closely distributed that they detract from one another. The proportion of garden features will be governed by the size of the house, and balance and symmetry should inform the layout, planting, and distribution of architectural features. These principles are clearly evident at Dolphin Square, and so the garden can be seen as an exemplar of Sudell’s philosophy.<sup>3</sup></p> <p>1 Dolphin Square Gardens, Pimlico, London SW1– Awarded Registered Park and Garden Status List Entry Number: 1455668</p>
--	--	--	--	---

				<p><a href="http://services.historicengland.org.uk/webfiles/GetFiles.aspx?av=B51B3E55-70DC-4D7D-8CE1442546BB8DA4&amp;cn=45FE0165-6CA8-4803-B320-387B498C9733">http://services.historicengland.org.uk/webfiles/GetFiles.aspx?av=B51B3E55-70DC-4D7D-8CE1442546BB8DA4&amp;cn=45FE0165-6CA8-4803-B320-387B498C9733</a></p> <p>2 It is acknowledged that the Spanish/Mexican-themed roof garden was reconfigured in the 1990s, and has less interest as a result, though retains its essential character. HE report, Dolphin Square Gardens 2018</p> <p>3 HE report, Dolphin Square Gardens</p> <p>3. With the exception of the horse chestnut axial avenue and the pair of lawns at south end of the site, the landscape proposals indicate that every other part of Dolphin Square Gardens would be redesigned and not restored or conserved.</p> <p>4. Important, distinctive and original hard landscape components of the Dolphin Square Gardens including the collection of large sculptural pots, Thakeham seats, (all of which require restoration), brick piers to the pergolas, boulders in Japanese gardens, crazy paving, Cotswold walling, etc, do not appear in the proposals.</p> <p>5. As a large part of the Dolphin Square garden comprises a roof garden it is surely very unsatisfactory that of the landscape drawings submitted none appears to clearly show the areas of the garden and trees which are proposed to be demolished nor areas located above proposed basement development or existing basement refurbishment works. The tree protection zones for retained trees as per the arboricultural report would need to be included on this plan.</p> <p>6. Furthermore, the impact of all additional operating areas and storage space required to carry out the proposed works both within the garden area and to all the buildings comprising Dolphin Square do not appear to be included in any submitted plans. The tree protection zones for retained trees as per the arboricultural report would need to be included on such a plan.</p> <p>7. There are a number of inconsistencies between the landscape proposals as presented in 'full landscape design drawings' (Aug 2018) and the arboricultural report table and plan, in particular with regard to existing trees, tree canopy sizes and trees to be removed; it is unclear which of these documents is accurate.</p> <p>8. There appears to be no information on future garden maintenance and management to accompany the landscape proposals; and the</p>
--	--	--	--	---

					<p>number of horticulturally trained staff required.</p> <p>9. What provision for maintenance and management is to be made for the Dolphin Square Garden during the building operations?</p> <p>10. What provision is to be made for residents to access the gardens during the course of the building works?</p> <p>Conclusion:</p> <p>This rare, high-quality, nationally significant, surviving garden by Richard Sudell at Dolphin Square Gardens is under serious threat from these radical and unsympathetic architectural and landscape proposals.</p> <p>Annabel Downs 30 August 2018 on behalf of the Dolphin Square Preservation Society</p>
Southsea Common	Hampshire	E18/0532	II	<p>PLANNING APPLICATION</p> <p>Relocation of Landing Craft Tank 7074; construction of new canopy; associated landscaping works including relocation of eight Holm Oak trees and regeneration of area of low quality planting; new access from the highway to the public car park; and repositioning of one Listed lamp post. D-Day Museum, Clarence Esplanade, Southsea PO5 3ST. VISITOR ATTRACTION, TREES</p>	<p><b>CGT WRITTEN RESPONSE 06.08.2018</b></p> <p>Thank you for including Hampshire Gardens Trust with the above Planning Application for proposed siting of the restored World War 2, Landing Craft . The Hampshire Gardens Trust have inspected the site , and support this application which will add to the attraction of the complex. The loss of mature landscaping in this area is regretted , however the high quality replacement is commended .</p> <p>Yours sincerely Deane Clark RIBA</p>
Eastleigh Local Plan	Hampshire	E18/0636	n/a	<p>LOCAL PLAN Adopted Eastleigh Local Plan 2016-2036 includes 5000 houses in a development adjacent to Stoke Wood (an ancient wood on the Hampshire Register) and across what had been a medieval Deer Park.</p>	<p><b>CGT WRITTEN RESPONSE 09.08.2018</b></p> <p>Hampshire Gardens Trust was consulted by EBC with regard to the fact that the proposed development site adjoins both Stoke (Park)Wood, an ancient woodland managed by the Forestry Commission, and extends through the site of part of the medieval Deer Park of the Bishop of Winchester, from which comes the name of Bishopstoke. The former Deer Park is noted on the Hampshire Register of Historic Parks and Gardens as Stoke Park. We acknowledge that no part of the site is registered nationally, however the Trust considers that the local historic significance has not been taken into sufficient consideration</p>

					<p>when choosing Option B as the preferred site.</p> <p>The long-term plan for 5000 houses with a major highway bisecting the area from Stoke Park Woods through the area of the old Deer Park, will totally remove all the historic significance that remains in the countryside between Bishopstoke and Marwell Park.</p> <p>The land rises southward from the stream running along the local authority boundaries, to the ridge at the top of Crowdhill. In the interests of the historic significance we believe that any future development should be restricted to the south of the ridge/hillside of Crowdhill. This would maintain a clear break in the landscape between the two authorities (Winchester and Eastleigh) whilst acknowledging the historic significance of the ancient Deer Park.</p> <p>We would return to our earlier contention which is that the alternative Option E remains the most sensible option for major development in the area. Whilst two sites, Allington Manor and Winslowe House, are also on the Hampshire Register most of this area has unfortunately already been degraded to a large extent, in contrast to the countryside of Option B which is still largely untouched. The Option E site also has existing railway connections, which could be enhanced.</p> <p>However, if Option B is to be a site for the major development it is vital for this part of Hampshire that it is not over-developed with 5000 houses and a major highway, but that a limited and imaginative plan be applied to provide needed accommodation whilst maintaining some integrity of the countryside and recognition of its historic significance.</p> <p>John Antony Hurrell, MCD, B Arch, MRTPI (rtd)</p>
Central Parks	Hampshire	E18/0680	II*	<p>PLANNING APPLICATION</p> <p>Demolition of existing buildings (Bargate Shopping Centre and multistorey car park, 77-101 Queensway, 25 East Street, 30-32 Hanover Buildings, 1-16 East Bargate and 1-4 High Street, excluding frontage)</p> <p>refurbishment of basements and mixed use development comprising 244 flats (102x one</p>	<p><b>SCAPPS WRITTEN RESPONSE 23.08.2017</b></p> <p>On behalf of Southampton Commons &amp; Parks Protection Society, I would make the following comments on the above Planning Application.</p> <p>The Society acknowledges the Planning Application 16/01303/FUL and its intent to restore the space east of The Bargate adjacent to the Town Walls.</p> <p>SCAPPS notes that less emphasis will be given to student accommodation and more to family flats in the revised plans.</p> <p>Unfortunately, the controversial subject of tall buildings on the site has been exacerbated as Block E, in the new application, will be increased in</p>

				<p>bedroom and 142x two bedroom) (use class C3), 152 units of student residential accommodation (353 bedrooms), retail use (class A1), flexible retail, office or food and drink use (Classes A1-A3), in new buildings ranging in height from 4-storey's to 12-storey's, with associated parking and servicing, landscaping and public realm (Environmental Impact Assessment Development affects a public right of way and the setting of the listed Town Walls) - Scheme amendments to planning permission 16/01303/FUL seeking changes to residential mix, design and additional height along Queensway. Bargate Shopping Centre and adjoining land In Queensway, East Street, Hanover Buildings and High Street, Southampton. MAJOR HYBRID</p>	<p>height from 9 to 12 storeys. The overshadowing of Houndwell Park - shade and visual impact - will be that much worse for the park's users. The City Centre Action Plan of 2013 seeks to improve the setting of the parks, not condemn Houndwell and Hanover Buildings to shade for most of the day. The City's Central Parks are Listed Grade II* and every effort should be made to maintain their attractiveness. The Society hopes that Section 106 money will be available to secure the old York Building route and repair Polymond Tower and sections of the Town Walls. Polymond Tower is outside the developer's "red line", but it forms an integral part of this area of the city as a monument to John Polymond, who was six times Mayor of the town in the late 14th century. Ideally, Polymond Tower should be visible from Houndwell Park as one walks down the main pathway. As we have said many times before, the commercial and retail premises in the city centre should not "turn their backs" on the Parks. Waste bins and delivery lorries are not what park users should have to endure. All future plans for this area should reflect this long-term aim. Kind regards Arthur Jeffery Chair of SCAPPS</p>
Panshanger	Hertford shire	E18/0578	II*	<p>PLANNING APPLICATION Proposed application for the creation of a car park for visitors to Panshanger Country Park together with provision of toilet facilities, information point and assoication landscaping and ancillary works at Panshanger Quarry, Panshanger Lane, Hertford, Hertfordshire SG14 2NL. PARKING, VISITOR FACILITIES</p>	<p><b>CGT WRITTEN RESPONSE 09.08.2018</b> Panshanger is a landscape of 'exceptional historic interest' being graded II* ( 1 of only 30% of Registered landscapes nationally) in recognition of the implemented designs of Brown and Repton. The Mimram valley landscape is the work of Repton who followed Brown's precepts in providing views from different 'stations' as the viewer moved through the landscape by carriage, horse or on foot. Many of these views centred on, across and along the river valley. Repton was particularly insistent that views from the house should take in the extent of his Broadwater. Broadwater Island was constructed not only to disguise the end of the Broadwater but was planted with ornamental species to draw the eye</p>

					<p>up the valley, and beyond the parkland to take in the wider landscape. This 'borrowed landscape' was a device use by Repton and is particularly important here as he considered the three Cowper estates, Digswell, Tewin Water and Panshanger/Cole Green, along the Mimram valley to be linked visually.</p> <p>There is insufficient evidence within the documents with this application for us to be able to comment.</p> <p>Specifically:</p> <ol style="list-style-type: none"> <li>1. The Legal Agreement revised in June 1982, to which the Planning Statement (5.0) refers, identifies three points of access and associated car parking, viz: Thieves Lane, North Lodge and Birch Green (Section 3.6 of the detail of the Revised Management Plan, June 1982). The Planning Statement asserts that the proposed car park is to be the main parking area. Given that the HCC, Tarmac, FPP and HGT agreed at a meeting of the Advisory Group on 11 November 2015 to work towards the implementation of the 'S52+' which acknowledges inter alia, the Registration of the landscape in 1987 by Historic England, we have seen no justification for this facility put within the Repton landscape. Although there is mention of Thieves Lane car park, no assessment of North Lodge nor of Birch Green as car park sites has been advanced. We would like to see the car park provision for the whole of the Country Park considered in light of the Heritage Report now being prepared as part of an overall Management Plan.</li> <li>2. The views, noted by Pevnser in the Buildings of England (Hertfordshire), are of great importance, not only those across and along the valley but also as one moves round the valley. There is no document considering the views from the valley sides, from north and south of the Broadwater, from the house platform and within the landscape. The single view presented in the Heritage Report is from the valley bottom beneath the house platform and shows a bund which is due to be removed, thus exposing the site of the car park. We would need to see a more detailed assessment of the views from the woods above the car park which recent research by HGT has shown to retain the Reptonian tree line, and the various points in the valley. The Historic England Guidance on Setting of Heritage Assets (GPA 3 v 2) section 20 suggests that a 'Zone of Theoretical Visibility' be the</li> </ol>
--	--	--	--	--	---



					<p>approach to any development affecting a heritage asset. At the least we would expect a series of views across the landscape as they will appear once the plant site bunding is removed.</p> <p>3. There is no detail of the horse-box parking area apart from a red line round the site. A more detailed plan indicating capacity and layout should be provided. We would also expect that the whole of that triangular space be available for coach/horsebox parking instead of the small portion shown on the plan</p> <p>4. There is no detail of car park charging infrastructure. One parking meter is indicated which is insufficient for the number of vehicles envisaged, with no provision at all close to the overflow car park. There is no mention of how this is to be enforced, e.g. if ANPR cameras are to be used then details should be provided, if parking is to be discouraged along the approach road or in the coach area, how is this to be achieved?</p> <p>5. There is insufficient detail on the 'native landscaping'. This is an area still within the Repton design and planted up by Earl Cowper following Repton's advice. Opportunity should be taken to conserve and enhance the surrounding landscape in accordance with the historic evidence and the NPPF (2018 version Chapter 16).</p> <p>6. The Heritage Statement states that the proposals are designed to accord with national and local planning and heritage policy. We are therefore disappointed to find that the Planning Statement appears to quote the old version of the NPPF not the new one, and the East Herts Local Plan (2007) instead of at least including references to the policies in the Local Plan which has just been approved by the Inspector and goes to Council for approval on 11th September.</p> <p>7. The Heritage Statement also states that 'it is deemed that any harm to the significance of the registered park will be minimal'. The Statement contains a lot of discussion about the definition of significance and what at Panshanger contributes towards it but no single Statement of Significance We would welcome the applicant's Statement of Significance so we can consider whether the proposals would indeed cause minimal harm. We would also welcome the applicant's definition of 'minimal'.</p> <p>We would welcome clarification of pedestrian routes to be open to</p>
--	--	--	--	--	--

					<p>serve the new car park. At present there is a footpath and a bridleway, neither of which are suitable for less-able visitors. The old carriage drive route to the old Panshanger House and the Southern Valley route are both closed at present. Is it envisaged that both will be opened if the car park is implemented as suggested on the plans?</p> <p>Kind Regards Kate Harwood Conservation and Planning</p>
Three Rivers Local Plan	Hertford shire	E18/0581	n/a	<p>LOCAL PLAN Additional Call for Sites <a href="http://www.threerivers.gov.uk/egcl-page/new-local-plan">www.threerivers.gov.uk/egcl-page/new-local-plan</a> <a href="mailto:trldf@threerivers.gov.uk">trldf@threerivers.gov.uk</a></p>	<p><b>CGT WRITTEN RESPONSE 07.08.2018</b> Thank you for consulting The Gardens Trust, of which Hertfordshire Gardens Trust is a member, At this stage in the process we not not wish to comment but would be interested in commenting on the sites put forward as a result of this exercise. Kind Regards Kate Harwood Conservation &amp; Planning Hertfordshire Gardens Trust</p>
22 Parkway, Welwyn Garden City	Hertford shire	E18/0583	N	<p>PLANNING APPLICATION Change of use from offices (B1) to hotel (C1) and erection of single storey rear extension. 22 Parkway, Welwyn Garden City AL8 6HG. HOTEL/HOSPITALITY</p>	<p><b>CGT WRITTEN RESPONSE 20.08.2018</b> Thank you for consulting the Gardens Trust, of which HGT is a member. We OBJECT to these proposals on the following grounds: 22 Parkway is in one of the most important positions in the design of the landscape of WGC with original designed views along Parkway, Howardsgate and diagonally. The Parker and Unwin inspired 'gateway' to Russellcroft is a key Arts and Crafts motif. The significance of this exemplar Garden City design would be substantially harmed both by the building extension and the signage etc which are concomitant with hotel usage. We note that there is no allocated parking or delivery facilities which will lead to congestion and loss of setting of the Conservation Area This is inappropriate development in a Conservation Area and its built &amp; landscape heritage contrary to NPPF(chapter 16). This is contrary to policies in the current and emerging Local Plans which requires development to be of high quality and sympathetic to the Conservation Area. These proposals demonstrate neither. The acceptable Change of Use defined in WHBC Policies TCR10 &amp; 11 do</p>

					<p>not include C1 (hotels) in this location</p> <p>We note that no EMS Application has been made, despite this falling within the designated area.</p> <p>Applications have twice been refused in the recent past. The current proposal does not address the reasons given for refusal in the past.</p> <p>We would urge you to refuse this application</p> <p>Kate Harwood Conservation &amp; Planning Hertfordshire Gardens Trust</p>
Youngsbury	Hertford shire	E18/0615	II*	<p>GENERAL CORRESPONDENCE Two applications to record a number of footpaths in the vicinity of the Youngsbury Estate to the east of the villages of Thundridge and Wadesmill, East Hertfordshire.</p> <p>FOOTPATH/CYCLEWAY</p>	<p><b>CGT WRITTEN RESPONSE 06.08.2018</b></p> <p>The significance of the Listed Youngsbury mansion depends in part on its setting which is itself a Grade II* landscape (of exceptional national historic interest and one of only 30% in the country). How the house and landscape are experienced (i.e. the setting) is not purely visual but also includes tranquillity. Much of this is still intact, and it is the county's only intact 'Capability' Brown landscape. The public Bridleway which runs up the main drive (as laid out by Brown) gives the views across the landscape which Brown intended: a carefully contrived illusion of bucolic peace. The gravel walks to the private bath house and along the river to the seat on the scarp would be engineered, like the drive, to be largely invisible in the long views.</p> <p>The key historic map showing the Brown landscape is that of 1793 This shows the landscapes as completed over several years and by a succession of owners, but always to Brown's original ideas</p> <p>The paths round the house were private for family and friends to facilitate living there. Landscapes of this high quality at this period were always private with thick trees screens (as shown here) to keep out the public.</p> <p>The only semi-public route was the drive (now Bridleway 39) and access to that was controlled by Lodge and gates at Wadesmill and the service road to the farm and walled garden to the north (Bridleway 48)</p> <p>Brown plan (north is at the bottom) showing the design which was followed to the realisation shown in the 1793 map.</p> <p>The 1768 map: This, we consider, shows work in progress as the old landscape is gradually altered . Several features are missing, such as the widened river Rib and the path circuit not yet in place but with the old</p>

					<p>routes across the park not yet superseded.</p> <p>Ordnance Survey Maps: 1890 and subsequent editions. The carriage sweep to the south of the house has now gone along with the path connection to the wider landscape. A terrace and a ha-ha are clearly shown defining the 'garden ground' with no paths within it, and no connection from the wider landscape to the south side of the house.</p> <p>The path from the Bath House along the northern side of the river to the entrance drive does not extend further east than the Bath House at any time.</p> <p>Today: The landscape is maintained by grazing and is a BAP priority habitat (<a href="http://magic.gov.uk">magic.gov.uk</a>) of Woodpasture and Parkland. No public access is possible from the major part of the parkland to the river due to fences and locked gates as the site is in divided ownership.</p> <p>Summary: Historically this has always been a private estate with no public access. Such paths as were laid out by 'Capability' Brown were for private use only. Access along the northern bank of the river was for the Bath House only and no further east and since the end of the 19th century there has been no path linking the south front of the house south eastwards across the parkland. HGT has visited many times and held meetings and guided walks at Youngsbury but we have never followed the proposed routes across the parkland, not seen anyone else do so.</p> <p>We suggest that the tranquillity of the parkland be maintained by not including the routes A to C and H via B to I. This would also preserve the integrity of the Grade II* in compliance with the NPPF (20018, Paragraph 194) which states that 'any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification.... [and to] grade I and grade II* registered parks and gardens should be wholly exceptional'</p> <p>HGT do not consider that the evidence for the modifications provides convincing arguments to justify the harm to the Registered landscape, its historic significance nor the harm to the setting and significance of the Listed house.</p> <p>Kate Harwood Conservation &amp; Planning: Hertfordshire Gardens Trust</p>
--	--	--	--	--	--

					August 2018
Benington Lordship	Hertfordshire	E18/0673	II	PLANNING APPLICATION Single storey rear extension. St Peters Church, Church Green, Benington, Stevenage, Hertfordshire SG2 7BS. BUILDING ALTERATION	<p><b>CGT WRITTEN RESPONSE 28.08.2018</b></p> <p>Thank you for consulting The Gardens Trust of which Hertfordshire Gardens Trust is a member.</p> <p>The church is part of the setting of Benington Lordship, a Grade II* house set in a Grade II Registered Park and Garden, whose boundary runs along the line of the hedge shown in the plans to the north of the church. Benington Lordship Registered Park also contains Listed curtain walls running south and east of the church and a Listed Summerhouse as well as Benington Castle, a Scheduled Ancient Monument. The church and Lordship are very closely connected both visually and historically, and a rare surviving example of this.</p> <p>The Heritage Statement with this application does not mention the Lordship nor the effect this proposal would have on the setting, and therefore the significance of it. We understand that the views from the Lordship towards the church have not been examined as part of this application. Views from the churchyard show the moat wall but views both from the house and the garden very clearly show this part of the church, which will be much more obvious when the trees are leafless. These views, from the higher viewpoint of the garden on the old castle mount and the house, clearly encompass the church as part of the setting of the House and Garden.</p> <p>The NPPF (16.189) clearly states that applicants should describe the significance of any heritage assets, including any contribution to setting. This is clearly not the case here.</p> <p>The NPPF further (16.194) states that any harm to or loss of the significance of a designated heritage asset should require clear and convincing justification. This is not included in the Design &amp; Access Statement. Although Section 3 of this document (Statement of Needs) dismisses other options such as the Village Hall for use for storage etc, it does not state why changes to the Hall, which is church-owned, should not be made in preference to harming these heritage assets. We are also concerned about the design of the extension. It would appear, from the incomplete, documentation that the north wall of the extension, which most affects the views from the Lordship is to be in brick, whereas the east and west walls are of flint with brick detailing.</p>

					<p>This wall should also be of flint.</p> <p>The proposed window in the north wall of the extension also has an adverse impact on the views from the Lordship, as it would be clearly visible. This window should be removed from the plans.</p> <p>We note that the path is to be pushed further north and the hedge cut back. The hedge is valuable screening and should not be depleted. We would suggest that a path is not necessary in that section as there is access from the west end of the church along the northern side.</p> <p>We therefore OBJECT to this application which is incomplete and does not take the important designated heritage assets of the Lordship into account. As detailed in this application this proposal is against EHDC Policies HA7 III (Listed Buildings) and HA8 Historic Parks and Gardens in the District Plan due to go to considered for ratification on 11th September, but the EHDC states that At this stage the District Plan will be given full weight in the determination of planning applications.</p> <p>Yours sincerely Kate Harwood Conservation &amp; Planning Hertfordshire Gardens Trust</p>
Gobions (Gubbins)	Hertfordshire	E18/0682	II	<p>PLANNING APPLICATION Erection of 1 x dwelling following demolition of existing. 8 Mymms Drive, Brookmans Park, Hatfield AL9 7AF. DEMOLITION, RESIDENTIAL</p>	<p><b>CGT WRITTEN RESPONSE 26.08.2018</b></p> <p>We are disappointed that the proposals do not include a Heritage Impact Statement as the site is within the setting of the Grade II Registered parkland of Gobions, laid out by Charles Bridgeman in the early 18th century, justly famous in its day and subject to much (published) research recently highlighting how much of the layout remains.</p> <p>Historic England GPA3 v2 (Setting of Heritage Assets) and the NPPF (2018) require LPAs to make decisions taking into account the significance (which is affected by setting) of heritage assets when making their decisions.</p> <p>As this property is on rising ground on the boundary of the RPG and is both larger and has a considerable amount of glass, including dormer windows, with the potential to cause glare and reflection, we would suggest that an HIA, including views affected across the parkland, is submitted before the application is considered"</p> <p>Kate Harwood</p>

					Hertfordshire Gardens Trust
9 Butterwick Way, Welwyn	Hertfordshire	E18/0702	N	PLANNING APPLICATION Erection of single storey rear extension. 9 Butterwick Way, Welwyn AL6 9GH. BUILDING ALTERATION	<p><b>CGT WRITTEN RESPONSE 26.08.2018</b></p> <p>Thank you for consulting The Gardens Trust, of which HGT is a member. We are concerned that the siting of this glass room would cause visual intrusion into the greenspace around the Frythe Avenue/Butterwick Way with glare and reflections adversely affecting the remnants of The Frythe historic landscape. We would suggest that the planting on the east/north-east boundary of 9 Butterwick Way be augmented to provide some mitigation for this harm to the landscape.</p> <p>Kate Harwood Hertfordshire Gardens Trust</p>
Putteridge Bury	Hertfordshire	E18/0739	II	PLANNING APPLICATION Single storey front extension. The Garden House, Putteridge Park, Luton, Hertfordshire LU2 8LD. BUILDING ALTERATION	<p><b>CGT WRITTEN RESPONSE 26.08.2018</b></p> <p>The Garden House, formerly the Head Gardener's Cottage for Putteridge Bury, is situated within a Grade II Registered landscape and forms part of the setting for the listed mansion, Home Farm and garden walls.</p> <p>There is no Heritage Statement to accompany this application, contrary to NPPF 16.189. We find the DAS misleading in that it compares the mansion with this very much more modest house, but does not assess or even mention the significance either of this property or the surrounding Registered parkland. The current house has been considerably extended in the past. We consider the inappropriate design and size of the proposed extension would harm the significance of the buildings and the RPG, without any convincing justification, contrary to NPPF (16.194). As there would be no public benefit accruing from this development but harm to the significance of various listed buildings and the registered landscape, we would ask that this proposal be refused permission.</p> <p>Kate Harwood, HGT (a member of The Gardens Trust, statutory consultee)</p>
Swainston	Isle of Wight	E18/0706	II	PLANNING APPLICATION Lawful Development Certificate for continued B8 (Storage and Distribution) use (revised plans and statement)(readvertised application). Land adjacent and	<p><b>CGT WRITTEN RESPONSE 20.08.2018</b></p> <p>The Isle of Wight Gardens Trust wishes to reiterate our comments made in relation to the earlier iteration of this application for lawful development certification submitted by us on 16th May 2018, namely: Most of the site identified within the application for the certificate for lawful development use is within the Registered Park and Garden of</p>

				at, Old Dairy Unit, Ashengrove, Swainston, Calbourne, Newport, Isle Of Wight PO30. MISCELLANEOUS	Swainston, Grade II listed, of national importance. We are concerned about the considerable encroachment into the Registered Park and Garden, which has occurred over the last 5-10 years. The current use clearly affects the setting and character of this important landscape. Given that there is no LDC for the site for its current use and no obvious justification to grant the certificate for lawful use for B8, we recommend enforcement action is undertaken, at the very least to instigate a landscape mitigation plan which would seek to reduce the visual appearance of the existing uses on the site and to define the extent of use in order to restrict further encroachment. John Brownscombe
Heigham Park	Norfolk	E18/0516	II	PLANNING APPLICATION Construction of 3 all-weather hard tennis courts, with flood lighting on the former grass courts. Heigham Park, Recreation Road, Norwich. SPORT/LEISURE	<b>TGT WRITTEN RESPONSE 03.08.2018</b> Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks & Gardens, as per the above application. The Gardens Trust very much appreciates the withdrawal of the previous application 17/00485/NF3 and the commissioning of a Heritage Impact Assessment to look in greater detail at the points we raised in our original response dated 11th April 2017 as well as altering the lighting. Please be assured that we sympathise with the difficult financial balancing act your Council faces, but we would urge you to again listen to our comments set out below before you make your final decision. The Heritage Impact Assessment is thorough and it is clear from the conclusions reached that the author agrees with our assessment that the proposed hard courts would without doubt affect the significance of this RPG (5.35 – “The impact (of the new hard courts) is significantly negative on the design and evidential value of the tennis courts and slightly negative on the design and evidential value of the park” and 5.49 – “The overall impact on the designed asset, the Park, is high on the less than substantial side.”). We must therefore see whether a solution can be found which satisfies your Council’s need to provide sustainable and affordable tennis facilities without substantially destroying this valuable, nationally important heritage asset. As it stands the proposed three new hard courts are sited across and blocking the main vista to the Pavilion, even though the Pavilion is less



					<p>obscured than in the previous application. We are unable to support an application with this basic design flaw which impacts so negatively upon the significance and understanding of the original design intent of Sandys-Winsch. We would suggest that contrary to HIA para 5.10, Sandys-Winch was not just recognised locally, but in fact had national recognition (GT response 11.4.17: “The Institute of Landscape Architects awarded him a special fellowship (apparently one of only 30 at the time), in recognition of his achievements in laying out the Norwich Parks...”).</p> <p>Since the HIA was written, as you will no doubt be aware, a new National Planning Policy Framework has come into effect. In particular we would draw your attention to paragraph 194 which states : “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of : (a) ... grade II registered parks or gardens should be exceptional.” The GT feels also that the new proposals do not comply with Para 195a &amp; b : “the nature of the heritage asset prevents all reasonable uses of the site; and (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation...” This is supported by the costed and carefully reasoned Business Case submitted by the Heigham Park Grass Tennis Group dated 12th July 2018. We would urge Norwich City Council to consider this very seriously. It would remove any costs for the running and maintenance of the courts from yourselves, saving you the £40,000 you mentioned in the Planning Statement (PS) as being the current annual expenditure on the courts. Their solution also has the benefit of having the pavilion within the securely fenced area, protecting it from vandalism. The GT would argue that Simon Meek’s comment (PS 1st para, page 2) “The introduction of new facilities is an opportunity to start to put the heart back into a number of Norwich’s Parks” has only become necessary in Heigham Park because the council itself forcibly closed the grass courts in September 2017. We therefore take issue with the term ‘disused’ and ‘former grass tennis courts’ (HIA 2.1). The PS makes clear that there is a huge demand for tennis facilities within Norwich. We would argue that 23 hard courts within one mile of</p>
--	--	--	--	--	--

					<p>Heigham Park, a further 18 within 2 miles and a total of 46 hard courts within the city of Norwich (yet no other grass courts), certainly strengthens the case for the retention of this historic heritage facility as there does seem to be considerable alternative hard court provision nearby. We would accept that for most tennis court operators, year round and evening play is a major factor within their business model, but in this instance, there is an operator ready and willing to take on the courts as they stand. We would urge your officers to please give this particular heritage site a reprieve, and allow the Heigham Park Grass Tennis Group say five years to prove that they can maintain and keep this heritage asset for the city. The money you save during this period, plus any additional funds from the Lawn Tennis Association or other bodies can be used to provide additional hard courts in less sensitive locations which the City Council could put forward, and everyone would benefit.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p> <p><b>TGT WRITTEN RESPONSE 22.08.2018</b> Thank you for getting back to me. I confirm that our assessment is that the harm to the RPG is "high on the less than substantial side'. Should the development be allowed, as stated in my letter of 3rd August, it would substantially destroy this valuable, nationally important heritage asset, something I am sure none of us would wish to happen. With best wishes, Margie Hoffnung Conservation Officer The Gardens Trust</p>
Grinkle Park Hotel	North Yorkshire	E18/0527	N	PLANNING APPLICATION conversion of stable block to cafe, farm shop, reception/shop/welcome area together with 3 no. holiday cottages, 47 holiday lodges with associated car park and ancillary	<p><b>CGT WRITTEN RESPONSE 18.08.2018</b> Thank you for notifying the Yorkshire Gardens Trust regarding this application. The Yorkshire Gardens Trust is a member of the Gardens Trust; the statutory consultee for historic parks and gardens. The Gardens Trust supports the County Gardens Trusts in the protection and conservation of designed landscapes and gardens. Following considerable research the Yorkshire Gardens Trust (YGT) has</p>

				<p>facilities and the construction of a Gamekeepers Barn. Grinkle Park Hotel, Grinkle Lane, Easington. HOLIDAY ACCOMMODATION</p>	<p>found that the historic designed landscape and gardens at Grinkle Park are a significant heritage asset. (See YGT Report, Grinkle Park, Feb 2018.) They are currently being assessed by Historic England for inclusion on the Register of Historic Parks and Gardens and the Trust considers that with careful development and management Grinkle Park could become an improved asset and resource for both the owners and the general public reflecting the importance of the site. Although these plans are an improvement on the previous plans that we have seen we remain very disappointed with this planning application and must register our objection to the application in its present form. The Conservation Management Plan (CMP) provides valuable information (albeit with some lack of clarity and commitment to specific proposals) for the following:</p> <ul style="list-style-type: none"> <li>• summary and baseline for understanding key sensitivity of the site [namely the historic buildings, their setting and the associated historic designed landscape].</li> <li>• overall strategic recommendations to guide development and conservation/ restoration and management</li> <li>• area based recommendations</li> </ul> <p>But regrettably the CMP appears to have been prepared at the end of the submission process or in complete isolation and therefore does not inform the revised application scheme or supporting documentation. The Trust had hoped that this new application would take a holistic approach but instead it remains fragmented and shows an absence of understanding. We also consider that it remains over- development.</p> <p>Design and Access Statement</p> <p>4.10 The landscape text is completely inadequate. There needs to be a site specific and detailed scheme linked to the research in the YGT document and developing the ideas of George Abbey – these are simply referred to and ignored.</p> <p>Heritage Statement</p> <p>The application does not grasp and understand the site sensitivities and therefore the revised scheme is not sensitive to the historic designed landscape and the historic building setting issues highlighted in the CMP and by YGT.</p> <p>We are concerned that overall the plans for the walled kitchen garden</p>
--	--	--	--	--	--

					<p>(both the buildings and the layout of the area) do not reflect its historic former use prior to the sale of the estate in 1946 and before it became degraded.</p> <p>Regarding the plans for Lowmoor Plantation, we are very concerned that the proposed lodges are now closer to the important landscaping around the carriage drive and are within the area identified within the YGT Research Study and the CMP as being particularly sensitive as they are within the historic designed landscape. We understood that the development was going to be concentrated in the northern section of Lowmoor Plantation that had been cleared and replanted (1947 catalogue describes it as a young plantation). This was well away from the lake and the landscaping in the southern section where remnants of Abbey's design remain. As noted above the planting recommended has not changed and is very generic i.e. native trees and grasses. It does not take account of the special significance at Grinkle of the work of George Abbey, which in our view is an opportunity missed.</p> <p>In the CMP we note 5.0 Conservation Management Strategy and 5.3 Estate Wide Policies and Approaches and 6.0 Monitoring Management but consider that these recommendations have not been acted upon. Thus in conclusion the Trust:</p> <ul style="list-style-type: none"> <li>• objects to the impact of the development proposals on the setting and the historic designed landscape as identified in the CMP and YGT research study and recommendations</li> <li>• recommends the CMP recommendations be developed in full so that they provide a baseline and framework for a revised scheme that fully acknowledges sensitivity and results in a full set of details that ensures the delivery of sensitivity, clarity and long- term commitment.</li> <li>• recommends any studies that are identified and referred to in the CMP as being integral to the preparation of detailed schemes, be undertaken</li> <li>• recommends the design team approach to the preparation of revised and detail schemes, as recommended in the CMP</li> <li>• recommends the design team be led by CMP expertise and strategic vision as set out in CMP.</li> <li>• recommends that, following the completion of CMP recommendations, the lodge scheme proposals be significantly revised</li> </ul>
--	--	--	--	--	--

					<p>to avoid identified sensitive areas and the walled garden scheme be reviewed to achieve a more sensitive outcome.</p> <ul style="list-style-type: none"> <li>• recommends that any revised scheme should incorporate full details, including the preparation of an appropriate methodology to prevent unnecessary damage during the work and also of aftercare and long-term management schemes to sustain the design and quality of the development and the restoration of the historic designed landscape. We recommend a Section 106 Agreement. <p>Yours sincerely, Val Hepworth Chairman</p> </li></ul>
Temple Grounds	North Yorkshire	E18/0537	II	<p>PLANNING APPLICATION Full Planning Permission to Replace Blue Timber Front Door with Racing Green Composite Door and Three White Timber French Windows to the Rear with White UPVC French Windows at Tanglewood, 14 Hermitage Court, Richmond, North Yorkshire DL10 4GE. BUILDING ALTERATION</p>	<p><b>CGT WRITTEN RESPONSE 10.08.2018</b></p> <p>Thank you for your letter of 20th July concerning this planning application. I apologise for the delay in my response.</p> <p>I have visited the site and had a look at the possible impact the application may have on Temple Grounds. Despite the fact that the trees are currently in full leaf, and the building concerned being invisible at present from Temple Grounds, I feel that the application, at least in regards to the replacement French Windows will have no discernible effect on Temple Grounds. The replacement of the front door, being on the north side of the building will also have no effect on Temple Grounds. In that regard, I have no objection to the application.</p> <p>I do, however, have concerns about the principle that is being put forward with this application, that being the plan to replace wooden windows and doors with uPVC and composite doors. I feel that uPVC windows and doors do not enhance or even complement traditional style stone buildings and I fear that this application might lead to a plethora of applications to replace wood with uPVC. While I can sympathise with the applicant whose wooden doors have so inexcusably rotted, and understand the practical and economic advantages of uPVC, I would urge the council to suggest that traditional materials be used for the proposed work.</p> <p>Yours sincerely Richard Lawson</p> <p><b>CGT WRITTEN RESPONSE 15.08.2018</b></p>

					<p>Thank you for your letter of 20th July concerning this planning application and I apologise for the delay in my response. I have liaised with the Gardens Trust [GT] and am now responding on behalf of both The Gardens Trust and the Yorkshire Gardens Trust to the above application.</p> <p>As you will no doubt be aware, the Gardens Trust (GT), formerly the Garden History Society, is the Statutory Consultee with regard to proposed developments affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. We would be grateful if you could please take our comments into consideration when deciding these applications.</p> <p>The Application: Siting and context of the application 14 Hermitage Court is on the northern boundary of the Temple Grounds where changes can adversely affect the setting of Temple Grounds. Temple Grounds is a Registered park and garden, included on the Register of Parks and Gardens of Special Historic Interest in England by Historic England for its special historic interest.</p> <p>Having considered the application details, we have no comments to make on this application</p> <p>Yours sincerely, Malcolm Barnett Trustee, Yorkshire Gardens Trust cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Howsham Hall	North Yorkshire	E18/0605	II	<p>PLANNING APPLICATION Change of use to a dual use of residential (Use Class C3) and private hire (Sui Generis) under Class V of Part 3 of Schedule 2 of the General Permitted Development (England) Order (2015), together with the temporary erection of outdoor marquee for no more than 4no. 5 day periods per year (part retrospective). Howsham Hall, Howsham Hall Road, Howsham, Malton, North</p>	<p><b>TGT WRITTEN RESPONSE 13.08.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. We have liaised with our colleagues in the Yorkshire Gardens Trust (YGT) and would be grateful if you could please take our comments into consideration when deciding this application.</p> <p>The YGT have driven past Howsham Hall but were not able to gain access. There is a distant view from Howsham Mill which confirms that the parkland is grass and trees in keeping with a possible Capability Brown report of 1770 and a layout of 1776. Google Earth shows plenty of trees near the house. This response is therefore a desk-based assessment.</p>

				Yorkshire YO60 7PH. MARQUEE	<p>The application is mainly concerned with alterations to the house and there are no alterations mentioned for the park as far as we could tell. There are 36 existing informal parking places on the gravel, and 20 on the adjacent grass. Our chief concern is that should the commercial use of the proposed marquee be successful, it is likely that more parking will be required, making inroads to the parkland. We have no objections as long as the parking is not extended further into any grass areas.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Trinity College	Oxford shire	E18/0499	II	<p>PLANNING APPLICATION Demolition of the existing building and the erection of a replacement building to provide a new auditorium, teaching, and student communal area. On the lower floors together with administration offices and student accommodation to the upper floors. The relocation and widening of the existing vehicular access from Parks Road further South. External alterations to the rear of the President's Garage. Landscape enhancements to the immediate setting of the proposed new building, library quad and the small quad to the south of library quad. Provision of covered cycle parking and replace glass house and machinery and tool store for the gardeners. And Listed Building Consent Application for listed building consent for alterations and</p>	<p><b>CGT WRITTEN RESPONSE 08.08.2018</b></p> <p>Thank you for the opportunity to comment on the above application. We note that in essence the proposal is to construct a new building along the southern boundary of the college site stretching from Parks Rd (E) to the Library Quad (W). This will involve the demolition of the listed Cumberbatch Building and will take up a large part of the area known as the Wilderness in the registered college gardens involving the removal of up to 20 trees.</p> <p>The Wilderness is part of what remains of the original C18 "Dutch" garden which lies to the east of the main college buildings as far as the wall and gates on Parks Rd. This area as a whole is divided into two sections separated by a yew "hedge". To the north are the large formal lawns and the path running from the Garden Quod to the gate on Parks Rd. We acknowledge that the application proposal will have no direct impact on this area.</p> <p>However it is on the area to the south of the yew hedge that the application proposals will have most impact. This area itself was originally divided into two equal parts by a long W-E path running parallel to the yew hedge towards the secondary gate on Parks Rd. The area closest to the southern boundary was known as the Labyrinth. By the C19 these two areas had grown together and the formal patterns of the Labyrinth were lost. The whole area became known as the Wilderness and took on a much more naturalistic woodland character with a mix of closely planted trees producing a dense canopy. The line of yews remains as its northern boundary but with trees replanted at</p>

			<p>extension to library to provide new auditorium with foyer, lecture theatre and teaching spaces, administrative offices and student rooms with a ancillary support spaces.</p> <p>Alterations to Parks Road wall to form temporary construction access, widen vehicular entrance and construct new lean-to gardener's buildings. Trinity College, Broad Street, Oxford. EDUCATION</p>	<p>different times it has lost much of its formal character.</p> <p>We note that the applicant's landscape consultants have categorised the Wilderness as having "medium" sensitivity to change. We can see that there is a certain logic in the proposal for a long range of buildings running W-E along the southern boundary of the site. The poorest trees (5 in category C, 1 in category U) are clustered along this boundary mixed with another 6 in category B. At the eastern end of the Wilderness is an area of gardener's sheds tucked away behind the President's Garage which we acknowledge will be rationalised and tidied up in this proposal. In effect this long building will take up the space originally occupied by the Labyrinth with its front running roughly along the line of what was the path running between the Labyrinth and the Wilderness towards the secondary gate on Parks Rd.</p> <p>However in addition to this 3 storey W-E range there is a proposal for a Pavilion building projecting from it further into the area of the Wilderness to the north. This is 2 storeys high with a flat roof to create a terrace for entertaining. To accommodate this seems to require the felling of almost as many trees again as required for the main building alone and the majority of them are category B. In total around 20 trees are proposed for removal half of which are in category B. They will be replaced by two new trees to the north of the Pavilion and two on the Parks Rd frontage next to the President's garage. Whilst we acknowledge that there may be good reasons for thinning out some of the trees in the Wilderness we would have hoped that this might have been balanced by more substantial proposals for replacement.</p> <p>We also note that the proposed location of the Pavilion slightly to the east of centre will create a residual area of the Wilderness close to Parks Rd. This will leave the majority of what remains to the west between the Pavilion and the President's Lodgings, to be renamed the Woodland Garden. Whilst we welcome the proposals for new under-planting here with shade tolerant perennials we should not lose sight of the fact that what remains of the Wilderness appears to be less than one third of the area that exists at the moment.</p> <p>Overall we cannot help but feel that an opportunity has been lost to maintain the W-E lines of the original Dutch garden by confining any new building to the area to the south of the line of the old path</p>
--	--	--	---	---



					<p>between the Labyrinth and the Wilderness. A single new building fronting the line of that path would both respect and reinforce the W-E linearity of this part of the garden and leave the Wilderness, even if renamed and replanted as the Woodland garden, in broadly its original position on the C18 garden plan. We certainly have strong reservations about the damaging impact the size and location of the Pavilion will have on the extent of the tree cover and the lines of the garden here. The Oxfordshire Gardens Trust recommends that reasonable steps be taken to investigate the archaeology of the Wilderness.</p> <p>Regards, Oxfordshire Gardens Trust</p>
Badger Dingle	Shropshire	E18/0609	II	<p>PLANNING APPLICATION Formation of a fish stock pool. Land East Of Badger Hall, Badger, Wolverhampton, Shropshire WV6 7JR. WATER FEATURE</p>	<p><b>TGT WRITTEN RESPONSE 22.08.2018</b> With reference to the above application, we are in receipt of the Heritage Impact Statement (HIA) produced for the applicant by BEA Landscape Design Ltd. We have also visited Badger and viewed the proposed development site from adjacent public areas. We present our comments on the amended proposals (location) as outlined in the Site Plan: Revision C dated July 30th 2018.</p> <p>The Gardens Trust objects to the proposed development. The designed landscape at Badger The Grade II Registered Park &amp; Garden at Badger is considered to be the work of the celebrated Midlands landscaper, William Emes (1729-1803), who with his associate John Webb and others (c.1754-1828) was responsible for landscape and other designs at Chirk Castle, Erddig and Powis Castle in Wales, for Dudmaston, Walcot, Oakly Park and Hawkstone in Shropshire, for Arley Hall, Peover and Cholmondely Castle in Cheshire and for Keele Hall and Sandon Park in Staffordshire, as well as numerous other commissions throughout the country.</p> <p>Badger is celebrated for its ornamented valley, known as 'The Dingle', containing an elegant serpentine lake characteristic of William Emes' style of waterworks (cf. the lake at Hawkstone). The Dingle itself is surrounded to the west, north and east by parkland, originally planted with trees as shown on the Ordnance Survey (OS) 1st Edition plan (1882, see Figure 1). The pattern of planting here is also in Emes' style. To the east, some 41 acres (16.5 ha) of parkland were enclosed within the eastern approach to the north, by the public road to the south and</p>

					<p>by an ornamented approach from Badger Hall to the Dingle on its western side. This contained a small lake called 'New Pool' which from its form appears to have been the work of John Webb. This would have formed an attractive landscape feature when seen from Badger Hall, with the wooded eastern approach acting as a visual boundary beyond. The reciprocal view from the eastern approach, across the New Pool towards the Hall, would have been similarly appealing.</p> <p>Figure 1: Extract from the OS 1st Edition (1882) showing the landscape of Badger, with the area included within the Registered Park &amp; Garden highlighted in green wash. The proposed development area is outlined in blue, although large parts of this area have already been substantially altered by earlier developments. Note the extensive parkland, then planted with scattered trees and woodland clumps, which encircles the western, northern and eastern sides of Badger village, the kitchen gardens and the remains of Badger Hall (now partly demolished). Lodges to east and south-west mark the two formal approaches through parkland and woodland areas to Badger Hall, both of which survive. To the north and east of Badger itself, the 'New Pool' is visible within what is now called the 'East Lawn', although this area was previously (and in practice, still is) largely indivisible from other parkland areas to the north and west.</p> <p>The proposed development</p> <p>A number of developments within the area described as the 'East Lawn' have taken place since the early 1990's. A substantial increase in size of the 'New Pool' appears to have taken place prior to 2009, as evidenced by aerial photographs of that period (see Figure 2 below), although no formal planning application for this development appears to have been made and the status of Badger Dingle as a Registered Park &amp; Garden (it was added to the Register on December 1st 1968) was similarly not acknowledged. It is not known whether this pool is registered under the Reservoirs Act as a 'large raised reservoir' although its area is in excess of 35,000 m<sup>2</sup>: it is likely therefore that its volume far exceeds the minimum 25,000m<sup>3</sup> needed for mandatory registration .</p> <p>Subsequent planning applications to further develop fishing operations followed thereafter and in 2013, an application was approved to create the 3 fish breeding pools, each of 60 metres x 30 metres, adjacent to</p>
--	--	--	--	--	--

					<p>the eastern side of the large fishing pool. Here again, the status of Badger Dingle as a Registered Park &amp; Garden was not acknowledged and in consequence, consultation with The Garden History Society (now The Gardens Trust), a Statutory Consultee for applications affecting all Registered Parks &amp; Gardens, similarly did not take place.</p> <p>The current application is for an additional fish breeding pool of 180 metres x 90 metres, equivalent to the combined area of all three previous breeding pools. The detail of this application will be discussed below.</p> <p>Heritage Impact Assessment (HIA)</p> <p>The HIA considers in some detail the likely impacts of the original proposal to locate the 1.6 ha (4 acres) commercial fish breeding pool (incorrectly referred to within the HIA as a fishing pool) within the boundary of the Grade II Registered Park and Garden at Badger, in a site to the east of the existing fishing pool and three smaller fish breeding pools.</p> <p>Figure 2: Aerial photograph c.2009, showing the extent of excavations within the boundary of the Registered Park &amp; Garden, and the resultant direct impact on its fabric caused by the construction of the original 'fishing pool' at that time. This will have been greatly exacerbated by the subsequent creation of the three existing fish breeding pools to the north and east of this 'fishing pool'</p> <p>It concludes that "...the proposed development will not have an impact on the majority of the Registered Park &amp; Gardens, the Conservation Area and listed buildings in proximity of the proposals..." (para. 8.5, p.19). It is assumed (see below) that the 'impact' referred to here is a direct impact, although the HIA fails actually to assess or even to acknowledge in full, the scale and extent of the likely physical impact of the proposed development on the actual fabric of the Registered Park and Garden itself. This is likely to be far-reaching and significant, as is evident both from aerial photographs taken during the creation of the original fishing pool in c.2009 and the considerable earthwork created at that time and subsequently by the creation of the three additional fish breeding pools (see Figures 2 &amp; 3).</p> <p>Figure 3: The substantial earthworks (arrowed) produced by the creation of the fishing pool and three adjacent fish breeding pools, as</p>
--	--	--	--	--	--

					<p>visible from two locations along the public road to the south and east of the proposed development area</p> <p>Notwithstanding the assertion within the HIA that this earthwork is '2m high' (para.6.5, p.12), it appears in the field to be substantially higher greater than this and covers cover an area of roughly 4 hectares (40,000 m2), as visible from the aerial photos. The proposed creation of the additional fish breeding pool, at 1.6 ha (16,000 m2 or c.4 acres) in area, is likely therefore greatly to add to the volume of the existing earthwork, as well as reducing by an equivalent extent, the area within which the excavated materials can be disposed of.</p> <p>The HIA concludes (para.8.5) that the earlier proposals (i.e. to site the new fish breeding pool in a location to the east of the three existing fish breeding pools) '...are considered...to have an adverse effect on the remnant of the East Lawn, the woodland and setting of both the Eastern Approach and also the Registered Park &amp; Garden. The proposals are also considered to have minimal adverse impacts on the setting of the Conservation Area and grade II listed Bridge'.</p> <p>Whereas previously as outlined above, the proposed location for the additional fish breeding pool was to the east of the previous three smaller ponds (see Figure 4(a) below), the HIA recommended that in order to mitigate the above impacts, '...it is recommended that the proposed stock pool is reduced in size, re-orientated to a Northeast to Southwest axis and moved to align with the existing commercial pools...' (para.8.6).</p> <p>Figure 4(a): Initial proposed location of the new fish breeding pool</p> <p>It was stated that this would allow for '...the potential reinstatement of the Eastern most [sic] field of the parkland as illustrated on the 1882-1883 Ordnance Survey...with the potential to replant a number of the lost parkland trees.' (para.8.7). However, only four trees are shown in this area on the OS 1st Edition plan (see Figure 1 above) so the benefit of this concession to the historic designed landscape is strictly limited. The HIA further states (para.8.8) that the proposed mitigation '...is considered to reduce the impact on the setting of the Eastern Approach, Conservation Area and Bridge to negligible, and minimises the impact on the Registered Park and Garden whilst allowing for the reinstatement of part of the historic parkland fabric'.</p>
--	--	--	--	--	--

					<p>In consequence, the proposed fish breeding pool has been re-orientated as recommended above, although its proposed original size (90m x 180m) has been retained as part of the planning application (see Figure 4(b) below).</p> <p>Figure 4(b): Revised location for the proposed new fish breeding pool</p> <p>We agree with comments made on behalf of Badger Parish Council (August 17th 2018) that ‘...the proposed change in position of the pool is significantly worse than the original [proposal]...There is also concern about the flood risk to the village with this proposed position and depth of the pool...’.</p> <p>Although it may to some eyes look better on plan, the natural topography of the site, which slopes considerably from north west to south east across the proposed development site (see Figure 3 above), means that the creation of a pool of this size in the proposed location would require the wholesale excavation and re-profiling of the existing spoil layers of spoil to create a levelled terrace across the whole of the proposed area, with a likely increase in the size of the downslope retaining bank that is well beyond the scale of the existing earthworks here.</p> <p>Similarly, as an addition to the existing fishing pool, which as stated above is likely to contain more than the 25,000m<sup>3</sup> required for registration under the Reservoirs Act, the location of the proposed fish breeding pool immediately adjacent to it (and to the existing three smaller pools), would appear to create what is in effect a ‘cascade’ series of reservoirs, which are considered to be of much higher risk than a single large reservoir/pool as at present.</p> <p>The planning framework</p> <p>As outlined in our earlier correspondence, the National Planning Policy Framework (NPPF) advises on the consideration to be taken into account in making a decision where a proposed development will impact upon a designated heritage asset, such as Badger Dingle, with ‘great weight’ to be given to the conservation of such designated heritage assets.</p> <p>By considering the significance of a park or garden, and the impact of a proposal upon it, the LPA must determine whether the proposal will result in ‘substantial harm to or loss of’ a heritage asset, or ‘less than</p>
--	--	--	--	--	--

					<p>substantial harm’, and apply the relevant policy accordingly. It further states that ‘Substantial harm to or loss of a grade II listed building, park or garden should be exceptional....’ (para.132).</p> <p>In our view, the existing proposal for Badger Dingle will cause direct and substantial harm to those areas of the Registered Park and Garden that will be affected by it. This will in practice be irreversible as it will not be possible easily to remove the proposed fish breeding pool, once excavated and installed.</p> <p>We also take the view that the cumulative effect of the proposed and previous developments, also constitutes substantial harm to the areas affected, which is in effect the whole of the area known as the East Lawn.</p> <p>It is debatable whether the loss of such a large proportion of the area of the Registered Park &amp; Garden of Badger Dingle similarly amounts to substantial harm.</p> <p>We consider that overall, the proposed development will cause less than substantial harm to the setting of the Grade II Registered Park &amp; Garden of Badger Dingle, the Grade II listed Bridge and the Badger Conservation Area.</p> <p>Where a proposed development will cause less than substantial harm to designated heritage assets or to their settings, the NPPF states that ‘...this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use...’ (para.134).</p> <p>This principle is included also within Policy MD13- The Historic Environment of the Shropshire Site Allocations and Management of Development (SAMDev) Plan Among other objectives, this states that: “In accordance with Policies CS6 and CS17 [policies within the Shropshire Core Strategy] and through applying the guidance in the Historic Environment SPD, Shropshire’s heritage assets will be protected, conserved, sympathetically enhanced and restored by:</p> <ol style="list-style-type: none"> <li>1. Ensuring that wherever possible, proposals avoid harm or loss of significance to designated or non-designated heritage assets, including their settings...</li> <li>3. Ensuring that proposals which are likely to have an adverse effect on the significance of a non-designated heritage asset, including its setting, will only be permitted if it can be clearly demonstrated that the public</li> </ol>
--	--	--	--	--	---

					<p>benefits of the proposal outweigh the adverse effect. In making this assessment, the degree of harm or loss of significance to the asset including its setting, the importance of the asset and any potential beneficial use will be taken into account..." [our emphasis].</p> <p>The NPPF also provides additional guidance on the nature of 'public benefit':</p> <p>"Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large, and should not just be a private benefit [our emphasis]. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.</p> <p>Public benefits may include heritage benefits, such as:</p> <ul style="list-style-type: none"> <li>• sustaining or enhancing the significance of a heritage asset and the contribution of its setting</li> <li>• reducing or removing risks to a heritage asset</li> <li>• securing the optimum viable use of a heritage asset in support of its long term conservation"</li> </ul> <p>It is clear that the proposed development, which is for business reasons and for the benefit of a private individual, fails this test of public benefit and hence of the key principle of sustainable development that is at the core of the NPPF.</p> <p>Yours sincerely,  Margie Hoffnung  Conservation Officer  The Gardens Trust</p>
Claremont	Surrey	E18/0711	I	<p>PLANNING APPLICATION Roof extension incorporating front &amp; rear dormer windows, single-storey side extension incorporating a rear canopy, new boundary wall to a height of 2.1m and a swimming pool following partial demolition of existing boundary wall. 1 Clare Hill, Esher, Surrey KT10 9NA. BUILDING ALTERATION, BOUNDARY,</p>	<p><b>CGT WRITTEN RESPONSE 29.08.2018</b></p> <p>This comment is submitted on behalf of the Surrey Gardens Trust following your consultation sent to The Gardens Trust, the national Statutory Consultee.</p> <p>This further iteration of proposals for the property would seem to have no significant impact on the Parks and Gardens interest of the Claremont Register site.</p> <p>Don Josey  on behalf of Surrey Gardens Trust</p>

				SPORT/LEISURE	
Westbrook	Surrey	E18/0757	II	<p>PLANNING APPLICATION Erection of 262 dwellings (Use Class C3) and 88 sqm community building (Use Class D1) and associated works including informal and formal open space,</p> <p>internal road network, landscape enhancement and access; following demolition of existing dwellings at Ockford Wood Farm, No.19 and No.21 Aarons Hill. Land Between New Way And, Aarons Hill, Surrey. RESIDENTIAL</p>	<p><b>VICTORIAN SOCIETY WRITTEN RESPONSE 31.08.2018</b></p> <p>RE: Proposals for land between New Way and Aarons Hill, Surrey affecting the setting of Grade II*-listed Westbrook House (by and for H. Thackeray Turner, 1899-1900) and the associated Grade II-registered landscape by H. Thackeray Turner with Gertrude Jekyll, early C20. The Victorian Society has been notified of this proposal and writes now to object to the current application on the following grounds. Although the Heritage Statement is not brief, it fails to grasp the interrelationship between Thackeray Turner and Jekyll's garden and the wider landscape setting. It addresses the visual connection in a superficial way only, with insufficient analysis of the importance of each viewing aspect and without any indication of proportionate research having been undertaken to properly understand the broader design intent behind either the house or its exceptional garden setting. This lack of proper assessment seriously impairs our ability to assess the impact of the proposals on the registered park and garden, which forms a material consideration in the planning process. Similarly, it limits our understanding of the impact of the proposals on the significance of Grade II*-listed Westbrook House, which is afforded significant weight as a highly graded designated heritage asset. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is relevant here: 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'<sup>1</sup> [Our emphasis]</p> <p><sup>1</sup> Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66, <a href="https://www.legislation.gov.uk/ukpga/1990/9/section/66">https://www.legislation.gov.uk/ukpga/1990/9/section/66</a>  NPPF paragraph 189 states further: 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.' We do not</p>



					<p>consider that these baseline requirements have been met by the current application documents.</p> <p>The integral assessment methodology of NPPF paragraphs 193-196 is also directly relevant, in particular paragraphs 193 and 194, which state:</p> <p>‘193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.</p> <p>194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.’<sup>2</sup></p> <p>The insufficient level of heritage assessment provided, along with the great weight provision to be applied to development within the setting of this highly graded heritage asset, render it impossible to duly assess the impact of the proposals on the significance of Westbrook or its designed landscape setting.</p> <p>We therefore conclude that the baseline requirements of national legislation and policies have not been met and the application should be refused on this basis. Further heritage assessment should be supplied in any scheme revisions, addressing the above comments, to enable a proper assessment of impact to be undertaken.</p> <p>I would be grateful if you could inform me of your decision in due course.</p> <p>Yours sincerely  Anna Shelley  Conservation Adviser</p>
Roker Park	Tyne and	E18/0601	II	PLANNING APPLICATION	<b>CGT WRITTEN RESPONSE 11.08.2018</b>

	Wear			<p>Temporary change of use of Roker Park and erection of temporary buildings and structures, to allow for Sunderland Illuminations &amp; Festival of Light to operate for a number of days annually between 1st October-31st November for a 5 year period to include. Roker Park, Roker Park Road, Sunderland. VISITOR ATTRACTION, EXTERNAL LIGHTING, PUBLIC PARK</p>	<p>This is a joint response to your consultation from The Gardens Trust (TGT) and Northumbria Gardens Trust (NGT). We are grateful for the opportunity to comment on this application.</p> <p>TGT/NGT wish to offer some comments of concern, about what we hope will become a continuation of an exciting and enjoyable annual Festival of Light in Roker Park.</p> <p>The greatest possible use of public parks for enjoyment and recreation must be a good thing. Their long-term sustainability can only be assured when people actually get inside them, have fun, feel relaxed, feel free, etc. So the principle of this Festival of Light is very laudable, and welcome. However, such obvious benefits must be balanced against possible damage to the park and its amenities. Specifically, from the vantage of TGT/NGT, will the long-term cultural importance of the park be damaged in any lasting way as a result of the temporary Festival. Regrettably this question has not been asked in any of the planning documentation, not even in the Heritage Statement – a useful document as far as it goes, which unfortunately is not far enough. As we understand it, the Festival ran up to 1935, again in the 50s and (though it's not spelt out in the Heritage Statement's introductory history) for the last two years. As there are no related planning approvals mentioned we understand, again reading between the lines, that for those two years, there was no planning approval for any of the works in the registered park? TGT/NGT further interpret the current five-year proposal as an indication that the last two years' Festivals were very successful, and the Council wishes to plan for the future. Someone in the planning department would seem to have advised that formal consent should have been obtained before and should now be sought. That's quite a common occurrence between Council departments and this regularising application is therefore welcome. It's also a lot of guesswork on our side and a summary of all these assumptions, if correct, should have been in the documentation.</p> <p>The Heritage Statement does not address what the impact of several thousand visitors at night will be on the soft and hard landscaping, and on the features within the park. It is quite general in its content and lacks, for example, the discipline of the Lighting Report, with its careful, item-by-item analysis (within its own remit) of the potential problems</p>
--	------	--	--	---	---

					<p>and the necessary mitigation. The Heritage Statement does not go into the same degree of detail.</p> <p>Specifically, we would note the following points.</p> <p>1 HARD AND SOFT LANDSCAPING. We are assuming, more guesswork on our side rather than written confirmation from the Council, that damage to lawns, beds, vegetation and trees will be avoided and any minor works needed will be undertaken in the post- Festival clear-up and repair/maintenance programme. Some of the light features will be located in the middle of lawns, adjacent to shrubberies, on steep banks, etc. We are concerned that the works may have a detrimental effect on the existing vegetation, which is unusually varied and maintained to a high standard. Hopefully there will be no damage to the hard landscaping either?</p> <p>2 LIGHTING STANDARDS. The lighting standards are being supplemented by further temporary lighting standards – no details unfortunately, but their design isn’t perhaps critical for a two-month festival. But things are being attached to the permanent lighting standards. We hope no temporary brackets etc will be left up all year? Again, presumably all the additions are simply reversible when the festival ends and any damage – paint scrapes etc., will be repaired.</p> <p>3 ELECTRICITY SUPPLY AND CABLING. Is the additional power for the Festival being laid on a temporary basis – overground with due H&amp;S protection - or is permanent cabling, transformers, etc being installed. If the latter, where are the details for comment. Any cabling would, we assume, be undergrounded. In their absence we assume all power supply and cabling will be temporary and removed at the end of the festival and the landscaping made good, where needed. All Festival-related fixtures and fittings will be removed?</p> <p>This additional information is essential for the purposes of making meaningful comment on this application. We seek an assurance that the park will return to its previous appearance post-Festival, and that the Council will carry out an inspection of the park after the Festival and all minor maintenance and repair items arising from the event will be implemented. We again assume that no significant historical features of the park will suffer any permanent damage because of the festival.</p> <p>These are obvious statements, that have not been made and now need</p>
--	--	--	--	--	--

					<p>to be made as part of a mitigation strategy attached to the Heritage Statement.</p> <p>The concerns raised can, we feel, be easily addressed by the Council. But they should be satisfied now as part of the planning process, before any decision is made. They cannot be relegated to a post-approval discharge of a planning condition. If our reasonable concerns cannot be addressed, we jointly reserve the right to elevate our response to a formal objection. We hope you can reassure us that the additional work on the Heritage Statement with its mitigation measures, will be undertaken before a decision is made, and that TGT/NGT will be alerted to its production so we can comment further. However, thinking positively, if the Council can address the need for additional information on the aspects set out above, then, hopefully, the concerns of The Gardens Trust and Northumbria Gardens Trust can be fully allayed. In which circumstances, we would hope to be able to wish the Festival well and congratulate the Council on a laudable initiative.</p> <p>Yours faithfully  Martin Roberts  On behalf of The Gardens Trust and Northumbria Gardens Trust</p>
Warwick Castle	Warwick shire	E18/0227	I	<p>PLANNING APPLICATION</p> <p>Retrospective application for the development of a Maze attraction, including a Viking ship and other themed structures, pathways, landscaping and associated infrastructure.</p> <p>Warwick Castle and Grounds, Castle Hill, Warwick. VISITOR ATTRACTION</p>	<p><b>TGT WRITTEN RESPONSE 13.08.2018</b></p> <p>We wrote a letter of objection to this scheme on 30th May 2018 and have discussed the application with Chris Hodgetts of the Warwickshire Gardens Trust since then. We understand that the application is coming before Committee tomorrow and that since we wrote you have submitted a report to which Dr Christine Hodgetts of Warwickshire Gardens Trust responded today. We would like to endorse her comments in the strongest possible terms and would be grateful if you could please ensure that the Committee are aware that the Gardens Trust, as statutory consultee, object very strongly to the loss of the Rose Garden, its ironwork and pathways. We would like to reiterate her comments : “If hard landscaping and features cannot be protected by the garden designations, there would be no point in having the garden register or including parks and gardens within NPPF guidance”.</p> <p>Yours sincerely,  Margie Hoffnung  Conservation Officer</p>

Cowdray House	West Sussex	E18/0570	II*	<p>PLANNING APPLICATION</p> <p>Construction of ten treehouses to provide tourism accommodation, access to the A272 and car parking, access paths and boardwalk. Biodiversity enhancements, woodland management and landscaping across the site. Land South of A272, Cowdray Park, Cowdray Estate Easebourne. HOLIDAY ACCOMMODATION</p>	<p><b>CGT WRITTEN RESPONSE 19.08.2018</b></p> <p>Thank you for consulting both the Gardens Trust and the Sussex Gardens Trust (SGT) on the above proposed development. Our interest is its effect on the Cowdray House, a park included on the Historic England Register of Parks and Gardens with a Grade II* designation. The SGT has not visited the site since the making of this application and the views expressed are based upon the information supplied and some local knowledge.</p> <p>I apologize for the delay in replying, but can confirm that the Sussex Gardens Trust is content in principle for the use of this block of woodland to be used for low key tourist use, should it secure the land's future management and implement a landscape plan that enables the woodland to continue to contribute positively to the wider designed historic landscape.</p> <p>Having said that, the SGT does have concerns regarding the size and number of tree houses proposed and their appearance. The Trust is not satisfied that the 'tree houses' will be satisfactorily absorbed in a low-key way within the woodland. Moreover, the development is not considered true to the 'tree house' typology; rather they are folksy stand-alone ground dwellings, albeit on stilts, lacking any special interest, and which may in the future drive the way the woodland is managed, i.e. with greater weight given to safety considerations. After all it is unusual for dwellings to be sited so close to forest trees.</p> <p>The Trust also fears that the appearance of the woodland will be harmed by the appearance of the car park and access drive from the A 272, should these be laid out to standard highway design codes. Rather they should be designed and laid out as per a typical informal rural car park.</p> <p>For these reasons the Sussex Gardens Trust considers that the development will cause harm to the Cowdray Park historic designed landscape and believes that inadequate justification has been provided for the size, number and appearance of the holiday units. The Trust therefore objects to this development and recommends revisions to address the Trust's concerns.</p> <p>Yours faithfully Jim Stockwell</p>
---------------	-------------	----------	-----	--	--

					On behalf of the Sussex Gardens Trust
Harewood House	West Yorkshire	E18/0446	I	<p>PLANNING APPLICATION  Replacement Jetties &amp; disabled ramp. Harewood House, Harrogate Road, Harewood.</p> <p>MISCELLANEOUS</p>	<p><b>TGT WRITTEN RESPONSE 28.08.2018</b></p> <p>We refer you to our earlier letter of 26th June and specifically to our comments on the above matter dated 27th July.</p> <p>We welcome the revisions to provide for a resin-bound gravel ramp, removal of the lighting and a more sympathetic paint colour for the iron-work. However with regret we note no further progress.</p> <p>Yours sincerely,  Margie Hoffnung  Conservation Officer</p>