

CONSERVATION CASEWORK LOG NOTES OCTOBER 2018

The GT conservation team received 158 new cases in England and 6 cases in Wales during October, 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, 39 'No Comment' responses were lodged by the GT and 6 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
Frenchay Park	Avon	E18/0895	N	PLANNING APPLICATION Change of	CGT WRITTEN RESPONSE 01.10.2018
House				use of land to residential, the	Formed in 1987 the Avon Gardens Trust is a member of The Gardens Trust
				erection of a single storey	which is the national charity dedicated to the research and conservation of
				extension and general	the country's designed landscape heritage. One of the roles of the Avon
				refurbishment to include	Gardens Trust is to help safeguard designed landscapes in the former
				replacement UPVC windows and	County of Avon by commenting on planning applications affecting them.
				doors, reconfiguration of internal	We would like to point out that the report to the Development Control
				layout and external works. New	(West) Committee was not correct in saying that the response of the Avon
				vehicular access. Clic Cottage,	Gardens Trust was "No Comment." The Trust did not receive the
				Beckspool Road, Frenchay, South	consultation letter and so was not aware of the application and did not
				Glos. BS16 1NT. BUILDING	make any response to it. However, had the Trust been made aware of the
				ALTERATION	proposal we would have submitted a letter of objection.
					Clic Cottage is one of two gate lodges to Frenchay Park House which was
				OUTCOME Refused	built in the 18th century by Alderman Deane. Later owners George Worral
				Appeal LodgedAppeal Ref	and William Tanner extended the parkland in the 19th century. The
				APP/P0119/Y/18/3209995	property became a hospital in 1931. The House is a Grade II listed building,
					Clic Cottage is a curtilage listed building and the parkland is designated as a
					Locally Important Park and Garden on South Gloucestershire's Historic

					Environment Record. We have considered the proposal and endorse the assessment and conclusion made on it by South Gloucestershire's Senior Planning and Conservation Officer in his comments dated 5th January 2018. As a result the Avon Gardens Trust supports the Council's reason for refusal and asks for the appeal to be dismissed. Yours faithfully Ros Delany (Dr) Chairman, Avon Gardens Trust
Frenchay Park House	Avon	E18/0896	N	PLANNING APPLICATION Change of use of land to residential and the erection of a single storey extension to form additional living accommodation. New vehicular access. Clic Cottage, Beckspool Road, Frenchay, South Glos. BS16 1NT. BUILDING ALTERATION OUTCOME Refused Appeal Lodged Appeal Ref APP/P0119/Y/18/3209995	Formed in 1987 the Avon Gardens Trust is a member of The Gardens Trust which is the national charity dedicated to the research and conservation of the country's designed landscape heritage. One of the roles of the Avon Gardens Trust is to help safeguard designed landscapes in the former County of Avon by commenting on planning applications affecting them. We would like to point out that the report to the Development Control (West) Committee about this application was not correct in saying that the response of the Avon Gardens Trust was "No Comment." The Trust did not receive the consultation letter and so was not aware of the application and did not make any response to it. However, had the Trust been made aware of the proposal we would have submitted a letter of objection. Clic Cottage is one of two gate lodges to Frenchay Park House which was built in the 18th century by Alderman Deane. Later owners George Worral and William Tanner extended the parkland in the 19th century. The property became a hospital in 1931. The House is a Grade II listed building, Clic Cottage is a curtilage listed building and the parkland is designated as a Locally Important Park and Garden on South Gloucestershire's Historic Environment Record. We have considered the proposal and endorse the assessment and conclusion made on it by South Gloucestershire's Senior Planning and Conservation Officer in his comments dated 5th January 2018. As a result the Avon Gardens Trust supports the Council's reasons for refusal and asks for the appeal to be dismissed. Yours faithfully Ros Delany (Dr) Chairman, Avon Gardens Trust

Gayhurst Court	Buckingha	E18/0856	П	PLANNING APPLICATION Listed	TGT WRITTEN RESPONSE 23.10.2018
	mshire	===, ====		building consent for the removal of	Thank you for consulting The Gardens Trust (GT) in its role as Statutory
				existing modern bay window and	Consultee with regard to proposed development affecting a site included
				the erection of a single storey	by Historic England (HE) on their Register of Parks & Gardens, as per the
				extension to the existing Annexe.	above application. We have liaised with our colleagues in the Bucks
				The Annexe At The Bath House,	Gardens Trust (BGT) and would be grateful if you could please take our
				Newport Road, Gayhurst, Newport	joint comments into consideration when deciding this proposal.
				Pagnell. BUILDING ALTERATION	Gayhurst Court (formerly Gayhurst House) is registered Grade II and is an
					18th century landscape park and mid c19 formal gardens around an earlier
					house. The gardens are attributed to Lancelot Brown c 1750-60 with
					modifications by Repton c. 1793. It is also noted that the eastern elevation
					of the registered park at Gayhurst abuts the Grade II* registered park at
					Tyringham. The listing for Tyringham contains this reference : "The south
					and east parts of the inner park are pasture planted with park trees in
					singles and clumps, with some exotics. This part of the park enjoys views
					east towards Soane's gateway and bridge spanning the river, across the
					avenue to the church over the river, and south-west to the Gayhurst
					parkland and Bathhouse beyond."
					The application site, The Bath House, is listed Grade II and attributed to
					Repton. The East front (the elevation subject to this application) is detailed
					as "East side, front two storey with projecting enclosure with battlemented
					rubblestone walls with two lancet openings in east wall". From the east
					elevation, the property looks over a small portion of the registered park at
					Gayhurst, then across Great Ouse River which is the boundary between the
					two registered parks and over the Wilderness towards Tyringham Park –
					the register for Gayhurst notes "From here there are excellent views over
					the Tyringham Estate and towards Tyringham House and bridge"
					It is noted that much of the property is a later reconstruction dating from
					the 1990s. The reconstruction was however, done with some sensitivity to
					the original structure and retained what original fabric was left. Although
					the structure is not original does not mean that it can necessarily tolerate
					further alteration and extension. The footprint, position and setting in the
					wider protected landscape should mean that careful consideration is given
					to any further change.
					We acknowledge that the Design and Access Statement (D&A)
					accompanying this application emphasises the continuing sensitivity to the
					original structure and fabric of the building but it is not for the Gardens
					Trust to comment on such details. It is noted that the current structure has

Kedleston Hall	Derby shire	E18/0871	1	PLANNING APPLICATION Variation of Condition 2 (the approved plans)	a simple bay window on the elevation subject to this application and it situated when the property is raised as can be seen in the applicant's submissions and particularly figure .04 in the above-mentioned D&A. The applicant states that the position of the proposed extension "maximises the views of the countryside to the east". However, the Gardens Trust wishes to express concern that the proposed new extension is similar to a conservatory in design, projects substantially further out from the building and, as shown in Drawing 18-20-P-04 'Proposed Plan and Elevations' is glazed on the three projecting sides which will result in substantially increased light reflection which will be visible from both near and distant views from both the Gayhurst Park and Tyringham Park registered parkland. Furthermore, as this structure is to be used for residential accommodation, this will result in substantially increased light emittence throughout the year, which again will be visible from both registered parklands. The GT and BGT therefore object to this application. Yours sincerely, Margie Hoffnung Conservation Officer TGT WRITTEN RESPONSE 16.10.2018 Thank you for consulting The Gardens Trust (GT) again as per the variation
	Snire			of AVA/2018/0071 to re-site the approved Driving Range and provide larger Store Room to the rear (The proposal may affect the setting of a Listed Building/Registered Park and Garden). Kedleston Park Golf Club, Kedleston Road, Kedleston, Derby, Derbyshire DE22 5JD. GOLF	to the above application. The relocation of the large practice bay further south against the woodland is an improvement, although it will still be visible from within the RPG and possibly the Kedleston Hotel. However, the GT still objects to the inclusion of the car park which is contrary to planning condition 2 of planning permission AVA/2018/0071. The GT would like to reiterate the condition that the practice barn must never be run as a separate business to Kedleston Golf Club. Should the Golf Club cease then the practice barn could not continue. Yours sincerely, Margie Hoffnung Conservation Officer

Thorndon Hall	Essex	E18/0912	*	PLANNING APPLICATION Demolish attached side garage. Re-build garage and construct single storey outbuilding for gym use construct basement under both elements linking together and provide 2 rooflight windows. Green Keepers Cottage, Thorndon Gate, Ingrave, Essex CM13 3RQ. MAINTENANCE/STORAGE/OUTBUIL DING	CGT WRITTEN RESPONSE 13.10.2018 Thank you for consulting The Gardens Trust and the Essex Gardens Trust on this application. This house lies within the grade II* registered landscape associated with Thorndon Hall. It occupies a historic position, the site of a small lodge, and remains on an access road to the park. Whilst having no objection to the rebuilding of the garage, or the basement, the outbuilding within the garden would be large and represent a further suburban intrusion into the registered landscape, as well as the Green Belt and the Conservation Area. I would ask you to take this impact on the heritage asset into consideration when determining this application. Regards David Andrews FSA, IHBC
Newark Park	Glouceste rshire	E18/0505	II	PLANNING APPLICATION Compliance with condition 3 (landscape) - Installation of play area including installation of compost WC. Newark Park House, Ozleworth, Wotton-Under-Edge, Gloucestershire GL12 7PZ MISCELLANEOUS	TGT WRITTEN RESPONSE 09.10.2018 Thanks for your email. I appreciate that it was your colleague dealing with this not you, but please, please PLEASE can you try to ensure that a serious omission of this nature doesn't occur again? The Gardens Trust is the statutory consultee for all grades of registered landscapes and as such our comments are of importance in the planning process. The setting and significance of Newark Park has undoubtedly been negatively compromised by this very ill thought out application. I visited myself last weekend and the new play structure is directly visible from the door of the Gothick Summerhouse, and the noise and disruption to the whole valley seriously affects the way in which the setting of the RPG is experienced. (-HE Setting of Heritage Assetts, - Hist Environment Good Practice Advice in Planning Note 3, 2nd edit, Dec 2017 – see Part 1, page 2, "Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity." Also p 4 "Access and Setting: Because the contribution of setting to significance does not depend on public rights or ability to access it significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting") I am very disappointed that the NT submitted this application despite knowing the GT's grave concerns. I had been watching out and waiting for the original application as I knew that they would submit it, which is why I

Abbotswood	Glouceste rshire	E18/0883	*	PLANNING APPLICATION Full Application for Side extension with associated internal alterations and landscaping works at Bowl Farm House, Lower Swell, Cheltenham, Gloucestershire GL54 1LE. BUILDING ALTERATION	was so disappointed not to hear about it until far too late. Margie Hoffnung Conservation Officer CGT WRITTEN RESPONSE 11.10.2018 The Garden Trust, as Statutory Consultee regarding planning proposals that might impact on Listed or Registerd gardens or landscapes has notified Gloucestershire Garden and Landscape Trust (GGLT) to respond on its behalf. In this instance, the proposed alterations to Bowl Farm has marginal impact on the wider parkland setting, and therefore GGLT does not wish to raise any adverse comment on this proposal. Yours sincerely, David Ball, (on behalf of GGLT)
Stouts Hill, Uley	Glouceste rshire	E18/0950	N	PLANNING APPLICATION Proposed Change of use of 14 timeshare units with associated leisure facilities to one residential property (Manor House) and 7 holiday accommodation units (Terraced Houses) with associated leisure facilities. Stouts Hill Club Ltd, Lampern Hill, Uley, Dursley, Gloucestershire GL11 5BT. RESIDENTIAL, HOLIDAY ACCOMMODATION	CGT WRITTEN RESPONSE 18.10.2018 The Garden Trust, as Statutory Consultee for planning applications that may impact on Listed or Registered gardens and parks, has been alerted about this proposal and has notified Gloucestershire Garden and Landscape Trust (GGLT) to make a response on this Change of Use application. The outline proposal to convert the Grade 11* Stouts Hill into a single dwelling and modify timeshare properties to become holiday accommodation would be welcomed in principle. The detailed implementation, and its impact on the wider landscape would however, continue to be of considerable interest to GGLT. In particular, Stouts Hill and its setting, which includes remnants of C18 plantings and historic ornamental gardens, is currently the subject of research by GGLT to determine the characteristics and extent of the historic parkland associated with this estate. The Garden Trust as Statutory Consultee and GGLT therefore, would wish to be consulted on any future proposals at Stouts Hill. Yours sincerely, David Ball, (on behalf of GGLT)

Broomfield House	Greater	E18/0220	II	PLANNING APPLICATION Creation	TGT WRITTEN RESPONSE 25.10.2018
broommeta mouse	London	110,0220	"	of a wetlands area (1500sgm)	The Gardens Trust (GT) was notified about this application by Historic
	London			involving increase in height of bund	England rather than by Enfield. We are disappointed that despite our
				by 0.8m, restoration of water	Statutory Consultee role with regard to proposed development affecting a
				feature together with associated	site included by Historic England (HE) on their Register of Parks & Gardens,
				landscaping to the south east	Enfield failed to notify either us or the London Parks & Gardens Trust
				corner of the park. Broomfield	(LPGT) of this application which is actually within an RPG. We are attaching
				Park, Broomfield Lane, London N13	a copy of our leaflet The Planning System in England and the Protection of
				4HE. WATER FEATURE	Historic Parks and Gardens: Guidance for Local Planning Authorities, and
				4ne. WATER FEATURE	·
					would be very grateful if you could ensure that in future we are notified of
					any similar applications. We have liaised with our colleagues in the LPGT
					and would be grateful if you could take our joint comments into
					consideration when deciding this application.
					The Park is included on the LPGT Inventory:
					http://www.londongardensonline.org.uk/gardens-online-
					record.php?ID=ENF005
					This entry shows that not only is the Park itself Grade II listed but is the
					setting of several grade II* historic features including Broomfield House;
					remains of C16-18th east wall with attached early C18th pavilion/garden
					house & stableblock. Additionally, the site is part of Metropolitan Open
					Land and in a Nature Conservation Area of Local Importance.
					It is not apparent from the documentation online why Broomfield Park was
					chosen as the site for this SUDs scheme. There is nothing to indicate
					whether other less sensitive sites were considered, even if they were
					eventually deemed unsuitable, and if so for what reason(s). The two
					proposed SUDS wetland cells and their and decking bridge sit uneasily in
					relation to the historic walls (Visualisation Fig 3, Planning Statement, p5)
					and the formal lime avenue, and are alien in character and appearance to
					the smooth 'parkland' grass which currently borders these features. Indeed
					the Heritage Statement 3.6.16 stresses the "relationship between the
					House, formal gate and parkland form the setting of Broomfield House. The
					setting makes a high contribution to the importance of Broomfield House."
					Introduction of wetland cells with their associated informal bog/damp
					planting/landscaping would considerably alter this key historic setting, and
					therefore would have a correspondingly negative effect upon the
					significance of the RPG. We disagree with Para 4.1.6 in the Heritage
					Statement which states that "it is considered that there will be no impact
					upon the setting of the surrounding heritage assets, including Broomfield

	House (Grade II*), walls associated with Broomfield House/Park Grade II)" The undoubted harm caused to the Grade II RPG (see NPPF Para 132) is not given any clear and convincing justification within the application documents. The GT/LPGT remain unconvinced that "The public benefit of the flood alleviation scheme to reduce flood risk is considered to outweigh the minimal harm caused to the Heritage Asset." (Heritage Statement 4.1.7.). The GT/LPGT are unclear as to the level of flood alleviation/water storage required. We would have liked clarification of the capacity of the existing lakes and stemming from this, a SUDs scheme designed proportionately so that the RPG and its constituent fabric/features are not harmed (NPPF Para 132 – great weight should be given to the conservation of irreplaceable heritage assets). The impression given by the available documentation is that this scheme is SUDs-driven rather than considering the overall benefits, which include public amenity value. Broomfield House and its Stable Block are already on the HAR register for London, and any further erosion to their fragile setting can only have a negative impact upon their significance. The GT/LPGT also have concerns relating to the ongoing management of the area and the provision of funding for the future maintenance of the decking/bridge. We can see this potentially falling into disrepair in a short timescale (it will attract vandalism). Since the Friends of Broomfield Park already undertake much of the maintenance of the Park and do not have capacity to take on more responsibility for core maintenance tasks we would like assurance that Enfield has sufficient budget for the increased maintenance this potential new feature will entail. The GT/LPGT would prefer to see the funding from Thamas21 and the Mayor of London being put to use for a SUDs scheme in a less sensitive site, or with a scheme that involves proper consideration of the heritage sensitivities of this site. We therefore OBJECT to the application as it current
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Marble Hill	Greater	E18/0850	II*	PLANNING APPLICATION 1. Marble	CGT WRITTEN RESPONSE 29.09.2018
	London			Hill House: External decoration and	I am writing to express the support of the London Parks & Gardens Trust
				repair work (if a window is	for the revised proposals made by English Heritage and shown in the
				substantially rotten, partial or full	application dated 7th September 2018 to carry out works to Marble Hill
				replacement of joinery) and	House and Park which are included at grade I (house) grade II* (park) and
				replacement rooflight. 2. Stable	grade II (stable block) in the Historic England List and Register.
				Block: External alterations,	The history of the estate is set out in the application documents, which
				installation of mechanical plant,	include recent archival and archaeological evidence commissioned to shine
				timber plant enclosure to the rear	further light on the development of the house and park. The history is
				and front landscaping (creating an	important not only for shaping and explaining the estate as it now stands
				outdoor seating area) to facilitate	but also for setting the context in which the proposals need now to be
				the refurbishment of the existing	considered.
				café. 3. Service Yard: new	The house was built and the estate assembled and landscaped for
				pedestrian access and associated	Henrietta Howard, Countess of Suffolk. She was a very remarkable woman
				refuse storage facilities. 4.	if only one of many important characters in the history of Marble Hill, and
				Landscaping: new soft and hard	it is right and laudable that English Heritage should put her at the centre of
				landscaping including restoration	the picture in their proposals for restoring and re-presenting the house and
				of gardens, upgrade of sports	garden.
				pitches and facilities, replacement	The early-to-mid eighteenth century is not currently studied much in
				of seating and new play areas. 5.	popular history, and to that extent may be considered unfashionable, but
				Sports Centre: External ramp for	at the period in which Marble Hill was built and its gardens and park
				improved access. Marble Hill	formed, from circa 1724 onwards, Twickenham was the focus for up-to-
				House, Marble Hill Park, Richmond	the-minute developments in literature, architecture and landscape. The
				Road, Twickenham. HYBRID	poet Alexander Pope moved there in 1719 and started forming his famous
					grotto and garden, drawing inspiration from the classical poets and
					contributing to the gradual breaking away from the formality of
					Renaissance and Baroque gardening, helping to lead towards what has
					become known as the English landscape garden.
					The banks of the River Thames between Hampton Court and Kew, as is celebrated and documented in the Thames Landscape Strategy, are an
					open-air textbook of garden design from the seventeenth to the twenty-
					first centuries, and Marble Hill is central and essential to an understanding
					of the "Arcadian Thames". Mavis Batey, one of the principal authors of the
					Thames Landscape Strategy, calls Marble Hill (in her "Alexander Pope: The
					Poet and the Landscape" 1999) "the most exquisite Palladian villa in
					England as important architecturally as Chiswick a little Palladian gem
					to be seen from the river, giving the Thames an air of the River Brenta".
					English Heritage has been assiduous in carrying out documentary and
					Linguisti Heritage has been assistatous in earlying out documentary and

archaeological research to establish the original layout of the gardens and park at Marble Hill, and similarly exemplary in carrying out public consultations and revising their proposals to take representations into account. The creation of a complex work of art like Marble Hill involves inevitably the efforts of many minds and many pairs of hands working towards achieving a harmonious whole. The London Parks & Gardens Trust agrees with English Heritage that the drawing in the Norfolk Record Office records in its mature mid-century state a garden laid out and planted a quarter of a century or so earlier to a design that was at the time as fashionable as the villa it complements but which was soon to become overtaken by the more "natural" landscape style – what Horace Walpole later in the eighteenth century called the "modern taste in gardening". Lottery funding, which is dependent upon the granting of planning permission, will enable English Heritage to carry out works that are necessary for the well-being of the house and the park. Successive national governments have withdrawn funding for the upkeep of the historic environment at the same time as reducing rate support to local authorities, and while Marble Hill park serves primarily as an amenity for the local population it is now run at a very considerable financial loss by English Heritage, which is now a charity. The house is of national importance in terms of its architecture and history, and there is now an opportunity to reinstate the park and garden setting that it deserves. The London Parks & Gardens Trust, which is affiliated to the Gardens Trust

The London Parks & Gardens Trust, which is affiliated to the Gardens Trust and a statutory consultee in respect of planning applications affecting registered historic landscapes, fully supports the current English Heritage planning application and urges your Council to grant consent. Helen Monger

TGT WRITTEN RESPONSE 08.10.2018

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 is writing to support the resubmitted application by Historic England for the landscape at Marble Hill. It is clear that they have thoroughly researched Henrietta Howard's C18 Pleasure Garden and a c1749 plan has informed the subsequent restoration strategy. They have also listened to local residents who know and love the site and taken on

board their concerns, particularly in relation to placing increasing emphasis on encouraging biodiversity and wildlife and giving careful thought to the siting of the play area for younger visitors.

The GT has seen at first hand the meticulous restoration undertaken by English Heritage elsewhere (eg Wrest Park). The documentation supplied with this application demonstrates the great care and attention they have taken in order to achieve similar results here. The GT hope that your officers will support this application so that Lottery funding (which is dependent upon the granting of planning permission) can restore the house and landscape for the enjoyment of this and future generations. We also endorse fully the comments submitted independently by the London Parks and Gardens Trust and will not repeat the many points raised by them.

Yours sincerely,
Margie Hoffnung
Conservation Officer

TGT WRITTEN RESPONSE 31.10.2018 ADDITIONAL COMMENTS

The Gardens Trust understands that your officers require a response to the lengthy reports submitted by the *Love Marble Hill* (LMH) group by tomorrow. We would like to record our disappointment that a more collaborative approach was not taken by LMH at an early stage. This would have avoided the extremely regrettable recriminations and last minute additional responses from consultees and others, which threatens to jeopardise the very welcome proposals by English Heritage (EH), and divert attention from the urgent need to halt the deterioration of this extremely important historic garden.

The Gardens Trust have already made their endorsement of HE's thorough and careful research quite clear. We do not propose to spend any more time going over similar ground, or refuting any more of the numerous and lengthy comments made by LMH. Instead we would like to simply reiterate that we fully support HE's proposals.

We do however, take issue with the interpretation of some planning points outlined in their covering letter. We disagree with LMH's comments that the proposals are contrary to NPPF para 195. Indeed we feel that the proposals will certainly not 'lead to substantial harm to (or total loss of significance of) a designated heritage asset'. On the contrary we feel they will enhance Marble Hill's significance and are fully compliant with Para

				193 ("great weight should be given to the asset's conservation"). We also reject LMH's assertion that EH have not provided sufficient 'historical evidence for the proposed "restoration" and that the restoration will cause harm which outweighs public benefit. We feel that they have taken enormous care to research the history of the site, and have listened to local opinion, amending their original application accordingly. Should your officers approve this application, the benefits of the restoration will be enjoyed by a wide section of the public, freely and for many years to come. The Gardens Trust would like to reiterate our wholehearted SUPPORT for this application. Yours sincerely, Margie Hoffnung Conservation Officer
Willesden Jewish Cemetery (United Synagogue Cemetery), Roundwood Park	Greater	E18/0869	PLANNING APPLICATION Erection of a detached 3 storey residential block comprising three flats. Flats 1-16 Norman Court, 59 Pound Lane, London NW10 2HH. RESIDENTIAL	Trust is grateful for the opportunity to comment on this application, which has a material impact on the significance of Willesden Jewish Cemetery (United Synagogue Cemetery), Roundwood Park, a historic designed landscape which is Registered by Historic England at Grade II. The inclusion of this site on the national register is a material consideration. We write as the Planning & Conservation Working Group of the London Parks & Gardens Trust (LPGT). The LPGT is affiliated to The Gardens Trust (formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (English Heritage) Register of Parks and Gardens of Special Historic Interest. The LPGT is the Gardens Trust for Greater London and makes observations on behalf of the Gardens Trust in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the LPGT's Inventory of Historic Spaces (see www.londongardensonline.org.uk) and/or when included in the Greater London Historic Environment Register (GLHER). We object to this application as currently presented, because of its impact on the nationally designated Willesden Jewish Cemetery and the lack of strategy to consider this. It is unacceptably difficult to assess this application, as the applicant has not produced an adequate assessment of the significance of the heritage asset or the impact of the proposal on it. It fails to set out a strategy for conserving the nationally designated historic environment around it (NPPF 185) and on this basis, we urge you to refuse

Oshwal Centre, Northaw	Hertford	E18/0607	N	PLANNING APPLICATION Preapplication advice for the erection of elderly residential accommodation, central community building, crematorium and community farm. Oshwal Centre, Coopers Lane Road, Northaw, Potters Bar EN6 4DG. HYBRID	this application. By way of example of how a lack of understanding of the significance has led to a proposal, that fails to conserve the cemetery in a manner appropriate to its significance (NPPF 184), we note that the proposed building would be viewed along one of the main axis views within the cemetery, yet the application contains nothing that reflects the relationship between the proposed building and the cemetery. For example, no consideration has been given to the juxtaposition with the historic lodge or gateway, for example with the materials chosen to match Willesden Fire Station rather than the lodge attached to the national heritage asset of Willesden Cemetery. We therefore conclude that this proposal has not been designed with an understanding of the significance of the heritage asset and how to guard against damage to it, and therefore contains several elements which will have a detrimental impact on it. We therefore urge you to refuse this application and we would be grateful to be advised of your decision, or if further information is submitted. Yours sincerely Helen Monger Director On behalf of the Planning and Conservation Working Group London Parks and Gardens Trust CGT WRITTEN RESPONSE 22.10.2018 Thank you for consulting the Gardens Trust, of which Hertfordshire Gardens Trust is a member. We are disappointed that neither the Landscape Report nor the Heritage Statement takes into consideration the historic designed landscape, remnants of which remain. HGT has researched this site and a report is available from HGT on request. We are concerned at the extension of the buildings eastwards into the landscape which is agricultural Green Belt and consider that the total amount of building proposed would overdevelop this rural site and further harm the setting of the original mansion. Kate Harwood Hertfordshire Gardens Trust
Gobions (Gubbins)	Hertford shire	E18/0865	II	PLANNING APPLICATION Erection of a detached dwelling and two replacement bridges following the	CGT WRITTEN RESPONSE 15.10.2018 Thank you for your message via the Gardens Trust. I have read Lee Prosser's Heritage Statement and consider it a fair evaluation. There are 2

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demolition of existing buildings.	points arising from his document
Land rear of Nos 10-18 Mymms	1.He is citing an outdated version of the NPPF - probably because his
Drive, Brookmans Park, Hatfield	document is dated 2015. The updated paragraph is 194. and states that
AL9 7AF. RESIDENTIAL	Any harm to, or loss of a designated heritage asset (from its alteration or
	destruction, or from development within its setting) should require clear
	and convincing justification. We do not consider that the proposed
	development causes substantial harm but does cause (less than
	substantial) harm as it is within the designated landscape area and within
	the setting of the core garden features. Much work has been done by a
	team of HGT surveyors led by Tom Williamson on the core features but no
	investigation has been done on the outer areas. Mr Prosser relies on map
	evidence for claiming that no features were ever there. Until such time as
	thorough investigation (including archaeological) has taken place, we
	consider that this cannot be proven and that there may be undocumented
	features.
	2. Mr Prosser does not consider views from the core area towards the
	proposed development and whether they would be affected by any
	development.
	We consider that much harm has been done in the past by the insertion of
	Mymms Drive and the building of the houses along it. This development
	would cause further harm to the Registered site.
	Kind Regards
	Kate Harwood
	Conservation & Planning
	Hertfordshire Gardens Trust
	Treated as the Caracita Trast

Hamels Park	Hertfords hire	E18/0923	N	PLANNING APPLICATION Tennis court to be constructed in the garden of Hamels Mansion. Hamels Mansion, Hamels Park, Buntingford, Hertfordshire. SPORT/LEISURE	CGT WRITTEN RESPONSE 04.10.2018 The landscape at Hamels is of Local Historic Interest and Importance and is included on the EHDC and HGT lists of such landscapes. We are disappointed that the Design and Access Statement does not refer to the historic nature of the gardens. Further no attempt been made within these documents to consider whether the conserving and enhancing of the former, well-levelled tennis courts, still in use in the 20th century with which this garden was equipped would be viable. EHDC policy HA2 and HA8 and NPPF paragraph 192 all stress the desirability of enhancing the significance of heritage assets. We consider that re-use of the former tennis courts would be preferable to putting in a new court with fencing which is more appropriate to urban parks than country house gardens and which entails more ground disturbance and adverse impact on the character of these historic gardens. Mrs Kate Harwood Hertfordshire Gardens Trust
Markyatecell Park	Hertfords hire	E18/0973	II	PLANNING APPLICATION CONSTRUCTION OF 9 DETACHED DWELLINGS LAND SOUTH-EAST OF NEW LODGE (CELL PARK), DUNSTABLE ROAD, MARKYATE, AL3 8QJ.	We are very familiar with the landscape history of Markyate Cell and have visited the Registered Park on several occasions. We object to this application on the following grounds: The proposed development is wholly with the boundaries of the area registered at Grade II by Historic England contrary to: The NPPF (paragraph 184) states that heritage assets are 'an irreplaceable resource, and should be conserved in a manner appropriate to their significance'. This application would result in the irretrievable loss of a historically important section of the Registered Park, formerly the first sight visitors would have had with all the designed views associated with that. It would also result in a loss of setting and therefore significance for the Listed mansion house and cause harm to the rural setting of the listed Red Cow Farm. NPPF paragraph 189. The application contains no assessment of the significance of the heritage assets (Listed Markyate Cell House, Registered Park and Listed Red Cow Farmhouse and Barn) affected, including any contribution made by their setting. NPPF paragraph 194 We have seen no clear and convincing justification for the harm to and loss of significance to the park that this development would cause.

	The designed views along the valley of the river Ver, here historically extended to form a Broadwater, are key to the parkland and to the setting of the Grade II* mansion house. These views historically included those along the approach from New Lodge which this development adjoins. This development therefore also harms the setting, and significance of this important house by Robert Lugar. The importance of views and vistas has been emphasised in The Setting of Heritage Assets (HE GPA 3v2) which states 'many heritage assets have settings that have been designed to enhance their presence and visual interest' This is the case here at Markyate Cell. This application contains no assessment of how the views along the valley to and from the house and within the wider parkland would be affected or if any mitigation measures have been considered, contrary to Part 2: Setting and Views (paragraph 19 onwards). Markyate Cell lies on the northern edge of the village with no major development adjoining it. To permit development within the park would set an unwelcome precedent in terms of harm to setting and fabric of designated heritage assets. Regards Kate Harwood Planning & Conservation
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Skegness	Lincoln	E18/0809	П	PLANNING APPLICATION Part	TGT WRITTEN RESPONSE 09.10.2018
Esplanade and	shire			demolition of the existing pavilion,	Thank you for consulting The Gardens Trust (GT) in its role as Statutory
Tower Gardens				scout hut and nursery buildings,	Consultee with regard to proposed development affecting a site included
				alterations to the existing tower	by Historic England (HE) on their Register of Parks & Gardens, as per the
				house to include raising the roof	above application. We have liaised with our colleagues in the Lincolnshire
				height. TOWER GARDENS,	Gardens Trust and would be grateful if your officers could please take our
				PAVILLION, RUTLAND ROAD,	comments into consideration when deciding this application.
				SKEGNESS. BUILDING ALTERATION	The condition of the Pavilion is dire and the survey summary by Alex Rosen
					and Associates paints a depressing picture. It is clear that the Pavilion has
					been an integral part of the community within the town, from its opening
					in 1879 as a venue for dances, concerts and parties, right up to its more
					recent incarnation as a public house. With the final loss of the Pier in 1984
					the Pavilion, even in its dilapidated form, remains an important focus of
					local history and communal value. Therefore the GT would encourage ELDC
					to photograph and record the structure as far as possible and salvage
					whatever is financially feasible, even if only the iron frame. This could be
					reused in any replacement building, with interpretation to enable an
					understanding of the building and its history and sigificance within the
					Tower Gardens.
					Yours sincerely,
					Margie Hoffnung
					Conservation Officer

Alnwick Castle	Northumb	E18/0937		PLANNING APPLICATION Proposed	TGT WRITTEN RESPONSE 25.10.2018
	erland		'	single height education centre to	Thank you for consulting The Gardens Trust (GT) in its role as Statutory
	0.10.10			replace existing unsuitable	Consultee with regard to proposed development affecting a site included
				temporary accommodation,	by Historic England (HE) on their Register of Parks & Gardens, as per the
				comprising classrooms, gardener's	above application. We have liaised with our colleagues in the
				welfare facilities, glasshouse and	Northumberland Gardens Trust and would be grateful if you could please
				accommodation block. Land West	take our comments into consideration when deciding this application.
				Of Head Gardeners Cottage, The	The site analysis in the The Design Access and Heritage Statement
				Alnwick Garden, Greenwell Road,	acknowledges [3.0] that the proposed development site lies within a
				Alnwick, Northumberland.	walled garden. There is also mention of agricultural buildings (which
				MISCELLANEOUS	perhaps means horticultural buildings?) and the accompanying plan shows
					the footprint of historic conservatories.
					The Heritage Statement is basic and generic with very little reference to
					the specific history, development and interest of the proposed
					development site. It does however include a Historic Plan 1827 (source?)
					which appears to show garden plots to the north of Bondgate which we
					feel may possibly reflect the medieval boundaries of properties along one
					of the principal streets in Alnwick. We would suggest that there may well
					be potential here for earlier remains associated with the development of
					the town.
					The Archaeology section does provide a little more detail (but no
					suggestion of potential for earlier remains) with mention of a vinery,
					apparently on a different alignment to the later glass, attributed to the 3rd
					Duke in the period 1817 to 1847. We would like to have seen some
					attempt at examining whether this is when the site passed from town to
					castle ground and whether the enclosing walls date from this period. The
					4th Duke added a glazed hothouse to the east wall of the vinery. The
					hothouse of the old vinery was removed leaving only the backhouse which
					remains on site. This tantalising snippet suggests that there is reasonable
					survival of earlier structures, perhaps incorporated in the later buildings on
					the site. The steam plant which was built as part of the garden of the 6th
					Duke and remains today indicates further significant interest, as such
					survivals are increasingly rare.
					The Historic Plan 1865 (source?) shows building ranges (confirmed by
					Historic Plan 1867) as 2 big glasshouse ranges and further glass and lean-to
					shed ranges along the walls, indicating that what remains of historic
					interest predates 1865. The As Existing elevations show what appear to be
					historic glasshouses surviving within the site – one range could perhaps be

a propagation pit.
Given the location of the walled garden this leads us to wonder whether
this was in effect the frame yard – the power house of any large walled
garden complex where the plants were established under glass before
being planted out for display or production in other areas? Ancillary sheds
stored equipment and materials and provided work spaces (and heating
plant?). Proximity of the Head Gardener's residence allowed close
supervision of this important part of his domain. As ever it is frustrating
that little reference is made to the potential of the extensive archives at
Alnwick, which would no doubt be able to provide a wealth of detail on the
development of this important area of the gardens.
Given the scale, quality and long development of walled garden provision
at Alnwick Castle we would anticipate that the site retains significant
garden history/archaeology interest. Before any informed planning
decisions can be made we would like to see a full programme of research
and recording of both the standing structures and below ground survivals.
In the absence of sufficient information on the documentary background
and description of the surviving features of historic environment interest to
assess what is being lost in the proposed development we must OBJECT to
the proposal at this stage.
Yours sincerely,
Margie Hoffnung
Conservation Officer
Conservation Officer

Temple Grounds	North	E18/0922	П	PLANNING APPLICATION Full	CGT WRITTEN RESPONSE 31.10.2018
remple Grounds	Yorkshire	E10/0922	"		
	Yorkshire			Planning Permission to Raise	Thank you for consulting The Gardens Trust (GT) in its role as Statutory
				Height of Existing Garage Building	Consultee regarding the proposed development affecting Temple Grounds,
				for Accommodation Above at 9	a nationally important historic park and garden included by Historic
				Cravengate, Richmond, North	England (HE) on their Register of Parks & Gardens. The Gardens Trust has
				Yorkshire DL10 4ED. BUILDING	liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on
				ALTERATION, CHANGE OF USE	behalf of both Trusts regarding this application. We would be grateful if
					you could please take our comments into consideration when deciding this application.
					9 Cravengate is on the north eastern boundary of the Temple Grounds.
					Having considered the application details, we have no objection in principle
					to this application but we have concerns regarding the North Yorkshire
					County Council Highways comment that should the proposed annexe pass
					into third party ownership then there should be the minimum of one off-
					street parking space and that the 'main' house should retain a minimum of
					two off-street parking spaces. We are not aware that there is available
					space for such provision.
					Yours sincerely,
					Malcolm Barnett
					Trustee, Yorkshire Gardens Trust
Coverham Abbey	North	E18/0955	N	PLANNING APPLICATION Full	CGT WRITTEN RESPONSE 27.10.2018
Covernani Abbey	Yorkshire	E10/0933	IN .	planning permission for alterations	The Yorkshire Gardens Trust is a member of the Gardens Trust; the
	TOIKSIIIE			to existing barn with the addition	·
				of a mezzanine floor and change of	statutory consultee for historic parks and gardens. The Gardens Trust
				_	supports the County Gardens Trusts in the protection and conservation of
				use of outbuilding from	designed landscapes and gardens.
				garage/store to	Thank for your notification. The Yorkshire Gardens Trust is responding on
				kitchen/preparation area and	behalf of both Trusts regarding this application.
				installation of below ground	We have no specific comments to make on this application however we are
				services. Coverham Abbey,	pleased to note that all excavation works will be undertaken under the
				Coverham Lane, Coverham	supervision of an archaeological watching brief.
				BUILDING ALTERATION	Yours sincerely,
					Val Hepworth
					Chairman

Plumpton Rocks	North Yorkshire	E18/0965	*	PLANNING APPLICATION Part demolition of single-storey extension; Demolition of outbuilding; Erection of single-storey extension; Installation of fenestration and door; Alterations to fenestration. The Carriage House, Farrar Wood To Plompton Park, Plompton HG5 8NA. BUILDING ALTERATION	CGT WRITTEN RESPONSE 29.10.2018 Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to the proposed development affecting Plumpton Rocks, a grade II* site included by Historic England (HE) on their Register of Parks & Gardens, as per the above application. The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on behalf of both Trusts. The Carriage House is listed grade II* and is now part of a cluster of residential buildings originally designed as stables by John Carr of York for Daniel Lascelles in the mid 18C. They are part of the Plumpton Conservation Area. Due to its location we do not consider that this proposal will have an impact on the wider Registered Park and Garden. However we note Historic England's comments that the proposal would cause some harm to the significance of the listed building both in terms of character and visual impact, and the apparent lack of consideration of the
Valley Gardens and South Cliff	North Yorkshire	E18/0977	II	PLANNING APPLICATION Refurbishment and structural	character and visual impact, and the apparent lack of consideration of the preplanning advice. We have no further comments to make. Yours sincerely, Val Hepworth Chairman CGT WRITTEN RESPONSE 30.10.2018 Thank you for consulting The Gardens Trust (GT) in its role as Statutory
Gardens				works to re-open tunnel under funicular cliff railway and removal of adjacent steps with second tunnel under. Alterations to levels with associated drainage, retaining and landscaping works. South Cliff Gardens, Esplanade, Scarborough, NORTH YORKSHIRE. REPAIR/RESTORATION	Consultee with regard to the proposed development affecting South Cliff Gardens, Scarborough, a site included by Historic England (HE) on their Register of Parks & Gardens and on their Heritage at Risk Register. The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on behalf of both Trusts. We are very pleased that there is a detailed Conservation and Management Plan for the entirety of the Saving South Cliff Gardens Project. South Cliff is a designed seaside landscape of national importance within the Scarborough Conservation Area and its condition has been of much concern for some time. Scarborough South Bay was probably the country's first seaside holiday resort and the funicular railway is a very
					historic passenger railway and of outstanding significance. The tunnel link is as important now as it was when constructed, integrating the whole garden/designed landscape. It's refurbishment and re-opening makes economic sense as well as giving aesthetic and pleasurable outcomes for pedestrians. The Yorkshire Gardens Trust supports this planning application and the

				details that have been drawn up. Yours sincerely, Val Hepworth Chairman
Memorial Gardens, Nottingham	Nottingha mshire	E18/0853	PLANNING APPLICATION War Memorial. Victoria Embankment, Nottingham. SCULPTURE/MONUMENT	CGT WRITTEN RESPONSE 04.10.2018 NGT: NO OBJECTION Nottinghamshire Gardens Trust has previously commented on the proposal to install a new 'roll of honour' memorial to commemorate the centenary of the First World War. At the pre-application stage we raised a number of issues some of which have been addressed in the submitted application. It is helpful that the proposals are accompanied by a well-researched heritage statement that provides valuable information about the origins and development of the Memorial Gardens and is sufficient to respond to the requirements of the NPPF paragraph 190. Unfortunately, at the time of writing the Design and Access Statement was not available on the planning authority website, so the following comments are made without the benefit of having seen that document. The Memorial Gardens are a grade II registered park (List Entry Number 1001506). The Heritage Statement confirms the information about the origins of the gardens that is provided in the official list entry, but adds considerably more information about the lead up to the creation of the Memorial Arch. To summarise, it is clear that the Memorial Gardens were being considered in outline form at the same time as the development of plans for the Memorial Arch and that they form a group together. It appears from the archival evidence that the detailed design of the main part of the Memorial Gardens evolved around the initial symmetry and that the bandstand to the south was also considered at the outset, but did not get installed until 1937. The Nottinghamshire Gardens Trust, no longer objects to the proposed new memorial. The Heritage Statement has confirmed that the design chosen and location are sufficiently sensitive to the original layout and present character of the registered park. The suitability of a formal monument to honour the centenary of WW is also acknowledged. We remain very concerned about the overall condition of the registered park and listed Memorial Arch. The Heritage Statement acknowledges the issues t

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		condition of the Victoria memorial (with inappropriate fencing) and
		fountain, are presenting the Memorial Gardens in a run-down poor
		condition. The proposals for the new memorial are not accompanied by
		any information that provides confidence that these issues will be
		addressed by Nottingham City Council. We remain unconvinced it is
		appropriate to be seen to be investing heavily in a new memorial in the
		absence of a scheme of restoration, repair and maintenance for the
		original WWI memorials (garden and archway).
		It is noted that there have been proposals submitted by the City Council for
		Listed Building Consent this summer, that include for new gates,
		replacement of the vandalised windows and stolen cappings to cornices
		(18/01278/LLIS1). It is noted that the Gardens Trust was not consulted on
		those proposals and that LBC has been granted for the works in
		September. This would appear to suggest that the City Council has begun
		to address some of the issues around the condition of the Memorial Gates,
		but the LBC application was not accompanied by any information that
		would confirm that the council has the long term plan and a list of
		prioritised work. In light of the acknowledged funding squeeze on public
		parks, a fully comprehensive condition and management plan should be
		considered essential to ensure priorities are addressed and budgets
		maximised. There is no condition assessment accompanying the Listed
		Building Consent so we are compelled to question whether these works are
		the most appropriate way to invest public money in the park, and whether
		this addresses the priorities of the present condition of the Memorial Park?
		Nottinghamshire Gardens Trust is supportive of the plans to commemorate
		the centenary of WWI with a new memorial and raises NO OBJECTION. We
		are keen to promote a longer term project that would attend to the
		existing commemorative heritage of the Memorial Gardens and Arch. The
		Gardens Trust is keen to assist the City Council with planning for the future
		of the Memorial Gardens and offers assistance in the form of advice and
		guidance.
		Jason Mordan
		Senior Practitioner Historic Buildings
		Nottinghamshire County Council
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Radgor Dinglo	Shronshiro	E19/0600	п	DIANNING ADDITION Formation	TCT WRITTEN RESPONSE OF 10 2018
Badger Dingle	Shropshire	E18/0609	II	PLANNING APPLICATION Formation of a fish stock pool. Land East Of Badger Hall, Badger, Wolverhampton, Shropshire WV6 7JR. WATER FEATURE	TGT WRITTEN RESPONSE 09.10.2018 The Gardens Trust disagrees with the opinion of your officers that the amended position of the proposed pool and landscaping is not contrary to adopted policies. We reiterate the comment from our letter of 21st August that "the proposed development, which is for business reasons and for the benefit of a private individual, fails the test of public benefit and hence of the key principle of sustainable development that is at the core of the NPPF." We quote paragraph 196 from the revised NPPF: '196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.' As the proposed development is wholly for private commercial benefit, there can be no public benefits accruing. The addition of this enormous new fish-breeding pond will in addition compound damage already done to the fabric of the Grade II Registered Park and Garden, all of which was carried out without proper consultation. The GT continues to OBJECT to this proposal.
Compton Castle	Somerset	E18/0595	II	PLANNING APPLICATION The carrying out of internal alterations, replacement windows, new decking to rear and parking area and conversion of garage to habitable space and new vehicular access. Sherborne Lodge, Old Bristol Road, Compton Pauncefoot, Yeovil, Somerset BA22 7EG. BUILDING ALTERATION, PARKING	TGT WRITTEN RESPONSE 08.10.2018 Please accept my apologies that it has taken me a while to get back to you following your email of 7th September. We are glad to note that the height of the gate to the adjoining fence has been reduced as per our request. As there was no mention of the potential tree issue or landscaping in front of the fence, we assume that no trees will be impacted and that landscape details will be a condition of any planning application. Yours sincerely, Margie Hoffnung Conservation Officer

Mells Park	Somerset	E18/0849	II	PLANNING APPLICATION	TGT WRITTEN RESPONSE 04.10.2018
		-		Deepening of Halecombe Quarry	Thank you for consulting The Gardens Trust (GT) in its role as Statutory
				by the extraction of limestone,	Consultee with regard to proposed development affecting a site included
				replacement of existing asphalt	by Historic England (HE) on their Register of Parks & Gardens, as per the
				plant with a new asphalt plant and	above application. We have liaised with our colleagues in the Somerset
				associated facilities, retention of	Gardens Trust.
				the concrete batching plant and	We do not feel that deepening of the Quarry will have a direct impact upon
				the reopening of the access road to	the significance of Mells Park historic landscape. However, we would
				Rookery Farm with relinquishment	concur with the comments of Managing Agent, Mr Stephen Ellam, that
				of the existing permission and	there need to be some conditions and monitoring methods imposed to
				extension of end date for the	prevent the problem of dust affecting the health of the screening tree belt
				entire quarry and all quarrying	separating the Quarry from Mells Park. Should the health of the trees be
				activities to 31 December 2044	negatively affected and the Quarry became more visible, then the setting
				with restorationto be completed by	of the RPG would be adversely threatened; a situation I am sure none of us
				December 2046. Halecombe	would wish to see.
				Quarry, Leigh On Mendip,	Yours sincerely,
				Somerset. MINERAL EXTRACTION	Margie Hoffnung
					Conservation Officer
Ven House	Somerset	E18/0982	П	PLANNING APPLICATION	TGT WRITTEN RESPONSE 23.10.2018
				Reinstatement of 2 no. stone eagle	Thank you for consulting the Gardens Trust in its role as Statutory
				statues. Ven House, London Road,	Consultee on the above application which affects Ven House, an historic
				Milborne Port, Sherborne, Dorset	designed landscape of national importance which is included by Historic
				DT9 5RA. REPAIR/RESTORATION,	England on the Register of Parks and Gardens of Special Historic Interest at
				SCULPTURE/MONUMENT	Grade II.
					We have considered the information provided in support of the application
					and on the basis of this confirm we do not wish to comment, other than to
					state that we welcome the proposed reinstatement of the eagle statues
					which are original features of the Ven House designed landscape.
					If you have any further queries, please contact us at this email address and
					we would be grateful to be advised of the outcome of the application in
					due course.
					With kind regards,
					Alison Allighan
					Conservation Casework Manager

Norbury Park	Surrey	E18/0910	II	PLANNING APPLICATION Erection of facilities for and use of Phoenice Fields for camping in up to 30 No. tents and bases for up to 6 No. portable, serviced, camping huts. Phoenice Fields, Norbury Park, Mickleham, Dorking, Surrey RH5	CGT WRITTEN RESPONSE 02.10.2018 The attention of the Surrey Gardens Trust (SGT) has recently been drawn to this application. The site adjoins the western edge of the Historic England Register site of Norbury Park and the Trust is surprised that the Gardens Trust was not notified as the national Statutory Consultee. This would have triggered an earlier response from SGT. In general the proposals look to be unwelcome with the introduction of
				6DN. CAMPING	quasi-commercial activity to an isolated part of Norbury Park. The proximity of the Register site is not addressed in the submitted Design Statement which mostly seeks to downplay significance and impact assessments. The immediate location of the application site next to the Register boundary will impact severely on its setting along the field margins. It is accepted that the wooded character of the Register site is a mitigating factor but the introduction of vehicle movements, parked cars, the entrance hut, glamping huts, the services blocks and the potential numbers of campers on site would all seem to be to the physical and visual detriment of the adjoining Register site and, indeed, the wider Norbury Park. Don Josey On behalf of the Surrey Gardens Trust
Lower Gatton Park	Surrey	E18/0911	II	PLANNING APPLICATION Demolition of existing dwelling & outbuilding and erection of new build replacement dwelling and ancillary accommodation with new soft and hard landscaping proposed. High Beeches, Gatton Bottom, Reigate, Surrey RH2 OTU. DEMOLITION, RESIDENTIAL	CGT WRITTEN RESPONSE 06.10.2018 This comment is submitted on behalf of the Surrey Gardens Trust. High Beeches sits within the widely drawn boundary of the Lower Gatton Park Historic Park or Garden Register site. The existing house of the 1960s was placed within Tower Wood part of the parkland and woodland setting of Gatton mansion and its pleasure grounds. (Register description - Park section). Some care has been taken in the design and location of the replacement dwelling to reduce its visual impact on the wider landscape of the Register site and on balance the impact seems, at the worst, comparable with the existing structures on the application site. Don Josey

Brookwood	Surrey	E18/0914	Τı	PLANNING APPLICATION The on-	CGT WRITTEN RESPONSE 09.10.2018
Cemetery	,			site remediation and processing of	I refer to Jeffrey Ng's email consultation to the Gardens Trust dated 3
,				approx 7000 cubic metres of	October.
				material in existing stockpiles, up	The Surrey Gardens Trust (SGT) is a member of the Gardens Trust, the
				to approximately 3 metres in	Statutory Consultee for Historic Parks and Gardens. I have corresponded
				height, including sorting, riddling,	with the conservation staff of the latter and this response is submitted on
				screening and crushing using	behalf of both organisations.
				mobile/temporary plant and	During a recent visit member of SGT were pleased to see the results of
				equipment to create two	ground clearance, rhododendron removal, and monument cleaning in the
				landscaped terraces for future	larger southern section of the extensive Cemetery. The application site is in
				burials, with tree and shrub	the north section at its east end and alongside the railway. This general
				planting, habitat creation,	area is equally in need of renovation and its appearance is not helped by
				footpaths, boardwalk, furniture,	the waste material that was tipped here some years ago ostensibly for
				ancillary car parking, the making	ground improvement.
				good of Eastern Avenue together	The current scheme has been well prepared with appropriate Design and
				with access alterations at junction	Heritage Statements. It is accepted that there is little archival evidence for
				of Chapel Avenue and Cemetery	the detailed design of this northern area. The Register entry refers, by
				Pales. Brookwood Cemetery,	comparison with the south section, to a more open character with less
				Cemetery Pales, Brookwood,	evergreen planting. Eastern Avenue loops round with dissecting pathways,
				Woking, Surrey GU24 0BL.	an arrangement that was in place and shown on OS plans of 1871/1882.
				MINERAL EXTRACTION, CEMETERY	The application site is to the north of this circular avenue between it and
					the railway, and is thus at the margin of the extensive cemetery.
					The creation of burial terraces seems to be a significant change in
					character by introducing height into an otherwise relatively flat landscape.
					However, the gradients of the terrace sides will reduce their visual impact
					and they will be partly masked by associated landscaping with new
					plantings of trees and shrubs. The terraces will also help define the outer
					limit of the cemetery.
					The proposals would seem to be acceptable from the parks and gardens
					point of view by reason of their design and location, with a localised
					physical and visual impact in a limited area of the extensive Register site.
					No doubt conditions will be imposed to ensure removal from the cemetery
					of any of the waste materials not used and/or unusable in the proposed
					scheme.
					Don Josey
					On behalf of the Surrey Gardens Trust a member of the Gardens Trust

Spa Gardens,	Warwicks	E18/0731	П	PLANNING APPLICATION	CGT WRITTEN RESPONSE 29.10.2018
Royal Leamington	hire			Improvements to existing	Thank you for consulting us on these applications. We apologise for the
Spa				municipal car park as part of the	lateness of the response, but hope that you will bring this letter to the
•				Leamington Spa car park	attention of your planning committee. We understand that both these
				displacement programme.	applications are to be heard at the same committee meeting, so we have
				Improvements include new asphalt	rolled our comments together to avoid unnecessary repetition.
				surfacing, lighting, CCTV, pay	We are liaising with the statutory consultee, The Gardens Trust, in sending
				machines and formalised parking	this objection to the applications. The objection primarily relates to the
				bays. Car Park, Archery Road,	detrimental impact on Victoria Park, by reason of the loss of trees and the
				Leamington Spa. PARKING,	provision of additional lighting.
				EXTERNAL LIGHTING	You are well aware that Victoria Park is part of the Leamington Spa
					Gardens, registered at Grade II on the English Heritage Register of Historic
					Parks and Gardens. The extension of the original 1985 designation of
					Jephson gardens to include the entirety of Leamington's riverside parks
					occurred in 1999. The designated area now runs from Newbold Comyn to
					the Princes Drive weir. The existing Princes Drive car park and Lodge are
					included in the designated area, although the CA boundary does not
					include both. The designation boundary oddly excludes much of the
					Archery Road car park (former tennis courts) but this is irrelevant to the
					determination of W18/1551 as the trees to be removed lie along this
					boundary and the impact of the parking is immediate.
					The park was procured to be the "People's Park" dedicated to that use in
					1897 in celebration of the Queen's Jubilee. Its layout reflects its intended
					use for informal recreation, and although formal games (cricket and
					football, Association and Rugby) were played here, they did not preclude
					the use of the main central area of the park by the people at other times.
					Although the town successfully saw off the council's attempt to build an
					indoor bowling arena on the park, there has been a progressive erosion of
					the informal open space in recent years. However, such erosion cannot of
					itself be used to justify further damage to the park. Warwick District Local
					plans have included an exemplary policy for the protection of historic parks
					and gardens since 1995. It is distressing to see that other arms of the
					Council have no compunction in attempting to raid its own nationally or
					locally designated historic parks for other purposes
					Archery Road
					The former tennis courts have been the subject of earlier applications. We
					responded to application W13/0827 with an objection. In the event the
					proposal to resurface and mark out parking bays was deemed to be

permitted development and permission was granted for the present unworthy storage buildings. The accompanying statement assured that the availability of the parking would be restricted via permits and passes. In fact the bays were not marked out, but access appears not to be restricted.

When seen in comparison with the 2013 application, the present one assumes a much greater magnitude. In order to produce a paltry number of parking spaces to make up a temporary deficit during the rebuilding of Covent Garden a row of trees which makes a significant contribution to the park is to be removed, leaving the cars exposed to full view, forming a considerable visual intrusion into the park. It will be many years before the proposed mitigation produces the desired effect. The council's agents wilfully misrepresent the arboricultural report. The line of trees is implied to be of less worth than that adjacent to the houses, though in fact the majority have been categorised as Category B and many require no remedial work. The whole point for the presence of the trees, to form a screen between the open area and the tennis courts (now the car park) has been ignored.

We are surprised at the small consideration which has been given to the strong but constructive objection of the WCC landscape unit, while the Historic England "No comment" has been represented in your report as "No objection." It is well-known that HE only very seldom sends comments on Grade II assets, whether the proposals are objectionable or not. We also object to the provision of lighting. Although the new tennis courts are lit, that does not seem a justification for bringing yet more light into the park.

Prince's Drive

The present car park occupies the site of the former open air swimming pool The land was acquired for the purpose by the then borough in 1889. It ceased to be used in 1928, left empty and was levelled after the war. The land for the park was acquired in 1897. As it currently exists, this car park is largely separated from the park by the early twentieth century lodge and its hedged garden, though the cars do impinge on the New /river Walk as it approaches the viaduct.

In terms of visual impact the proposed work is not as objectionable as that to Archery Road. We do, however, have concerns at the potential for loss of category B trees arising from the work, particularly with regard to compaction of the roots as indicated in the arboricultural report. We are

	also concerned that screening from the rest of the park is proposed by an earth bund, rather than continuation of the existing garden hedge. We also register objection to the proposed lighting, particularly along the northern perimeter. This is alien to the concept of a park and marks out the path as the route to a car park, rather than an important design element. General We also wish to comment on the council's general policy with respect to the Victoria Park car parks. The two current applications are termed part of the Covent Garden displacement strategy, then, rather less conspicuously, they are presented as part of a long term ambition to increase the number of parking spaces in the town overall. The only justification for the provision of car parks in parks must be to enable people to enjoy parks. At the moment neither of these car parks is shown on the WDC parking information and they are clearly mainly used by people wishing to visit the park. It appears that the car parks are now more widely known and becoming used for all-day (free) parking. In that case, a charging strategy with ticket machines, would be reasonable, to return the balance in favour of park users. The proposed pricing strategy has been spelled out in the Report to Executive of February this year and also in the summary submitted with W18/1551. The intention is clearly stated to use the financial "incentive" of very cheap all day parking to encourage use by commuters and shoppers. Although one of the beneficial impacts is said to be allowing residents greater access to parks by the provision of extra parking, the two benefits cannot co-exist, as the pricing strategy will ensure that the car parks are full by the time recreational users arrive. It is apparent that an increase in parking revenue is a major factor in the current applications. We therefore urge that both these applications be refused. Yours sincerely Christine Hodgetts
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Spa Gardens, Royal Leamington Spa	Warwicks hire	E18/0913	II	PLANNING APPLICATION Proposed improvements to Victoria Park car park and change of use to Victoria Park Lodge garden to provide improved and extended car parking as part of the Leamington Spa car park displacement programme, including new lighting, CCTV, pay machine and additional parking spaces. Victoria Park Car park, Princes Drive, Leamington Spa. PARKING	CGT WRITTEN RESPONSE 09.10.2018 See response to E18/0731 above
Priory Park	West Sussex	E18/1011	N	PLANNING APPLICATION Temporary change of use to Christmas ice rink with ancillary food and drink uses, including the installation and removal of ancillary temporary structures. Priory Park, Chichester Castle, Priory Lane, Chichester PO19 1BL. VISITOR ATTRACTION	CGT WRITTEN RESPONSE 30.10.2018 Sussex Gardens Trust (SGT) has considered the above application. Whilst the Trust has reservations about the use of the park as envisaged in the application, it is recognised there would be public benefits that may justify approval. Detailed comments are shown below. Priory Park is recorded as an "Historic Park" at para 19.67 of the Chichester Local Plan (2014 - 2019), hence under the National Planning Policy Framework it is a "non-designated heritage asset". In determining the application, the Planning Authority should make a balanced judgement with regard to the scale of any adverse impact on the significance/ harm and any public benefits (NPPF para 135). The application does not include a "Statement of Significance" or an assessment of the effect of the proposals. The Trust considers the significance of the park is associated with the many listed historical buildings within and surrounding the park (Roman and medieval walls, Guildhall, the Motte, Priory Lodge and White Pavilion) - together these Heritage Assets have great Historical Significance; moreover, the park provides the setting for all of these and hence has great Aesthetic Significance. Additionally, the Park has great Evidential Significance because the site is thought to have extensive unexplored roman and medieval remains. As a public park it also has Communal Significance. The Trust has reservations about the use of the Priory Park for unrelated events which cause visual harm or physical damage to this non-designated heritage asset. In this case this application, the proposals, if approved, would cause harm to the Aethetic Significance of the Park due to the visual impact and noise intrusion, which could be substantial harm during the

					short period the ice rink is in use — and this has been reflected in the objections from some nearby residents. Nevertheless, the Trust recognises the use of the park as proposed for a short period during the quieter winter period might be acceptable, particularly if the public benefits are used to help fund the continued repair and maintenance of the park. There is a risk that grass and other garden features (ie trees, shrubs, plantings etc) could be damaged during the period the ice rink is used. For this reason, it is suggested any approval should include a condition that "the land should be restored to its condition immediately prior to the buildings being situated on the land by [say 31st March 2019]. This mirrors a condition attached to the approval of the Brighton ice rink; in practice we understand new turf is laid each year at Brighton. Yours faithfully Jim Stockwell On behalf of the Sussex Gardens Trust.
St Ives Estate	West Yorkshire	E18/0860	II	PLANNING APPLICATION Reserved matters application for 28 dwellings approved by outline permission 15/01039/MAO requesting consideration of layout, scale, appearance and landscaping. Land At Harden Road And Keighley Road, Harden Road, Harden, Bingley, West Yorkshire. MISCELLANEOUS	CGT WRITTEN RESPONSE 11.10.2018 Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee regarding the proposed development affecting St Ives Estate, a public park included by Historic England (HE) on their Register of Parks & Gardens. The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on behalf of both Trusts regarding this application. We would be grateful if you could please take our comments into consideration when deciding this application. We refer to our letter of 21st May 2018 objecting to the previous application (REF: 18/00158/MAR) for this site which we considered would harm the significance of the Registered landscape of St Ives Estate due to the proposed urbanisation of its rural setting. We find that this application is an almost identical proposal to that refused by your council in August this year. St Ives Estate is a nationally important designed landscape, which was in the ownership of the Ferrand family for nearly 300 years. Between 1858 and 1889 it was developed by William Busfeild Ferrand as a romantic wild landscape "imbued with a variety of historical and mythical associations linking the past with the present. Conscientious enhancement of a naturally dramatic landscape reflects the fashion of the time for nature as a powerful force. It manifests in physical form its association with the philosophy of an important C19 Tory radical, a close friend of Disraeli and a

leading member of the young England movement". This proposed site for housing, which bounds St Ives Estate, currently makes a positive contribution to the estate's significance through its rural character and is an important part of its setting, as seen from Harden Road and Keighley Road in Harden village. It is a prominent location and any development will particularly affect the setting of the western section of St Ives Estate which W B Ferrand was still improving in 1886 and where he noted 'his plantations were very fine in 1888', the year before he died. This new application appears to be extremely similar to the previous application (Ref:18/00158/MAR) and has not addressed our concerns about the harm the proposed development would cause to the significance of the Registered landscape of St Ives Estate. The layout and house types appear to have been imported as standard designs without any attempt to relate them to the local architecture and their proximity to a Registered park and garden. We note that the building materials appear unspecified, thus it is not obvious that this current proposal is for houses in the traditional regional stone with stone or slate roofs, or indeed any kind of stone. We thus again conclude that the proposed development would have an
of the Registered landscape of St Ives Estate.
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adverse impact on the setting through its position and scale. Particularly
the proposed designs of the 3 storey houses for plots 12-17, 20- 25, would
result in an urbanisation of this rural site and cause severe harm to the
setting of the Registered park.
We therefore consider that the proposed development would harm the
significance of the Registered landscape of St Ives Estate, and strongly
object to this application.
Yours sincerely,
Val Hepworth
Chairman

West Yorkshire	E18/0878	II	PLANNING APPLICATION Alter surface of the car park from grass to hard surface (retrospective). Shibden Park, Godley Lane, Halifax,	CGT WRITTEN RESPONSE 19.10.2018 Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee regarding the proposed development affecting Shibden Park, a nationally important public park included by Historic England (HE) on their
			Calderdale. PARKING	Register of Parks & Gardens. The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on behalf of both Trusts regarding this application. We would be grateful if you could please take our comments into consideration when deciding this application. The location of the car park is alongside the access drive to the lakeside car park and we understand that it has been in use as an overflow car park. As noted in the Heritage Statement, Shibden Park is the 'jewel in the crown of Calderdale' and is much used and loved by the community and visitors. We note however that there is no reference to the Conservation Management Plan for the park in the supporting statement and suggest that this should
				be consulted. From our knowledge this area should not have a notable impact on the significance of the historic landscape and the setting of grade II* Shibden Hall, however the use of road planings as a surface material is, in our view, not acceptable. Reinforced grass would be of a more appropriate quality and better in keeping with the historic landscape. A second option would be crushed stone (but not limestone chippings). If, having referred to the Conservation Management Plan it is considered to be acceptable to have a permanent car park in this location it is important to ensure that it is properly designed and of the same quality as the rest of the park where there has been significant investment in landscape restoration in recent years. Although we have no objection to the car park, we do object to this retrospective application as submitted. Yours sincerely, Val Hepworth Chairman
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Clwyd	W18/0018	l II	BUILDING CONSENT TO CONSTRUCT REPLACEMENT LARCH WOOD PERIMETER FENCING WITH A LIKE FOR LIKE DESIGN, SCALE	CGT WRITTEN RESPONSE 03.10.2018 The Iscoyd Park planning application for replacement fencing came to the Welsh Historic Gardens Trust via The Garden Trust (TGT). WHGT has no objection to the proposed fencing. Regards Glynis Shaw (WHGT Clwyd)
		Yorkshire	Yorkshire	Vorkshire surface of the car park from grass to hard surface (retrospective). Shibden Park, Godley Lane, Halifax, Calderdale. PARKING Clwyd W18/0018 II PLANNING APPLICATION LISTED BUILDING CONSENT TO CONSTRUCT REPLACEMENT LARCH WOOD PERIMETER FENCING WITH

		GREEN, ISCOYD, WHITCHURCH	