



## CONSERVATION CASEWORK LOG NOTES JANUARY 2019

The GT conservation team received 182 new cases in England and two cases in Wales during January, 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, 34 'No Comment' responses were lodged by the GT and 10 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
Tyntesfield	Avon	E18/1338	II*	PLANNING APPLICATION Construction of a new Visitor Welcome Building and associated landscape works. Land At Tyntesfield, Adjacent To Home Farm, Wraxall. VISITOR FACILITIES	<p><b>CGT WRITTEN RESPONSE 06.01.2019</b></p> <p>Thank you for consulting The Gardens Trust [GT], in its role as Statutory Consultee with regard to proposed development affecting a grade II* Park and Garden which is on the Historic England's register of Historic Parks and Gardens in North Somerset. The Avon Gardens Trust is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.</p> <p>The Tyntesfield Estate encompasses a Grade I Gothic Revival house set within the Grade II* Registered Park and Garden and includes a number of separately listed estate buildings.</p> <p>Relevant to these proposals are the Home Farm range of buildings – Grade II*; grouped near to the existing car park.</p> <p>Also relevant to the height of the proposed building is the topography of the whole site. Page 19 of the Design and Access Statement, paragraph 4.2 Heritage Impact Assessment states,</p> <p>'The new building will be partially visible from 'Paradise' in the summer as it is largely obscured by trees. However, its impact would be minimal due</p>

					<p>to the structure being as small as feasibly possible’.</p> <p>We have made a site visit and the current car park is visible from external sites such as Flax Bourton and the Belmont Estate. Perhaps the most striking internal view will be from the road returning from Tyntesfield House, and the upper area of the Warren. Whilst we have reservations about the corner roof height of the Visitor Centre, we accept that strategically planted trees should reduce the harm to the views of the Historic Park and Garden.</p> <p>Option 6 of the current proposals for new Ticketing Facilities will have no direct material impact on the Home Farm range and Upper Yard but will have some impact on the visual significance of its setting. We consider this to be relatively minor if appropriate mitigation is adopted. The positioning of the new building in a natural gathering point of the car park, and at some distance from the farm buildings will allow it to be clearly read as a separate entity serving a specific purpose; and a sensitively designed structure in sympathetic materials and of an appropriate scale and massing would lessen its visual intrusion. Subject to the acceptance of an appropriately detailed design, this would be our favoured option.</p> <p>It is also absolutely clear that the position of the current Visitor Centre is untenable for the convenience of visitors and also for the counting of visitor numbers accurately.</p> <p>Summary: The Avon Gardens Trust has no objection to this proposal provided that the Landscape and Planting Proposals Plans are implemented.</p> <p>Yours sincerely Ros Delany (Dr) Chairman, Avon Gardens Trust</p>
Moggerhanger Park	Bedfordshire	E18/1246	II	<p>PLANNING APPLICATION and Listed Building Consent Proposed marquee located within Stephen Thornton's walled garden. Moggerhanger House, Park Road, Moggerhanger. MARQUEE</p>	<p><b>CGT WRITTEN RESPONSE 14.01.2019</b></p> <p>Thank you for consulting the Gardens Trust (GT) in its role as statutory consultee on this proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. The Bedfordshire Gardens Trust is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on its behalf in respect of such consultations.</p> <p>Bedfordshire Gardens Trust recognises that the maintenance and restoration of the outstanding Grade I Soane house and its outbuildings, and the Grade II gardens and parkland associated with Humphry Repton, is a very considerable financial commitment. We are therefore sympathetic</p>

					<p>to the argument that the Moggerhanger Buildings Preservation Trust needs to increase its income. The site selected for the marquee within “Stephen Thornton’s walled garden” which adjoins the earlier walled garden associated with Godfrey Thornton, is less damaging to the ensemble of house and landscape than sites nearer the house.</p> <p>I can find, however, no reference in the supporting documents to the fact that the surrounding landscape is registered Grade II, so the significance of the site is not explored or the potential harm to it assessed (as required by policy HE2 of your Council’s emerging Local Plan). The ridge height of the proposed marquee is not given, but it appears from the proposed elevations that it would be in excess of 5m, considerably higher than the walls of the two walled gardens – which are themselves listed Grade II, and stated in the listing to have “excellent group value” with the house, other listed outbuildings and the landscape.</p> <p>A 36m x 15m white plastic marquee (proposed to be in position, apparently, on a permanent basis all the year round) would be visible from Godfrey Thornton’s c1790 walled garden to the south; Garden Wood, with its walks laid out by Repton (1792 Red Book), to the west and northwest; and the parkland and approach drive to the north. It would be particularly intrusive from the east, where a section of the wall of Stephen Thornton’s c1806 walled garden is missing, and clearly visible from the path south of the walled gardens shown as a drive in Repton’s plan.</p> <p>As well as visual intrusion, there is the question of the impacts of the use of the marquee. The whole justification claimed for the proposal is that it will greatly increase the capacity of the Park to hold weddings from 80 guests to 300. However, it is not clear how this increased scale of operation will be managed with no further built development or other impacts like noise – traffic, parking (for guests and the additional staff), access for service vehicles, caterers, deliveries, refuse, security and so on. Nor is there any information on the new landscaping planned for the area around the marquee (Design and Access Statement para 5).</p> <p>We consider (on the limited information available) that the visual intrusion from a permanent marquee would harm the significance of the registered site as a landscape and a setting for the listed buildings, and that together with impacts from the use of the site, the harm would be substantial (NPPF July 2018, paragraph 194).</p> <p>We suggest that your Council should seek further information on these issues before it can decide whether the harm to the registered site is</p>
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					<p>outweighed by public benefits, and that if granted, permission should be temporary with some conditions on periods of use. There should be a middle way between permanence, and the cost and disruption of dismantling and erecting a marquee every time there is an event. It is unusual to find an application for permanent planning permission for a marquee, which from the materials used can only be a semi-permanent structure.</p> <p>Yours sincerely  Caroline Bowdler  Bedfordshire Gardens Trust  Conservation</p>
Wotton House	Buckinghamshire	E18/1442	I	<p>PLANNING APPLICATION  Proposed new access road. Land At Yeat Wood Farm, Kingswood Lane, Wotton Underwood, Buckinghamshire. ROAD</p>	<p><b>TGT WRITTEN RESPONSE 22.01.2019</b></p> <p>We are grateful that when AVDC was notified about their initial failure to consult The Gardens Trust (GT) about the above application, this omission was swiftly rectified. The GT is the 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 be grateful if you could take our comments into consideration when deciding this application.</p> <p>The RPG at Wotton was recently upgraded by HE to Grade I which places it within the top 9% of registered landscapes within the country. A planning application such as this, which in our opinion negatively affects such an important heritage asset, needs strong justification.</p> <p>The revised NPPF Para 197 states that where harm to a designated asset is less than substantial, the harm should be weighed against the public benefits of the proposal. No public benefit is apparent from the online documentation. In addition, your own Policy AVDC GP.35 states that the design of new development proposals should respect and complement the historic scale and context of the setting. The new proposed access road which bisects the North drive of Grade I Wotton House approximately half way along its route, does not appear to comply with this requirement.</p> <p>We concur with your Landscape Officer's view that groups of native tree planting on open stretches 'would not be appropriate within the avenue as it would not respect the historic pattern of tree planting as shown on the 1885 historic map, and because it would draw attention to the road.' We are unsure why a new access road is even necessary, since the existing one is in good condition with no obvious drawbacks. The current HE listing</p>

					<p>specifically mentions the importance of planned views, and the map accompanying the Register entry clearly shows that the North Drive is the central of three planned vistas which would be adversely affected by this proposal.</p> <p>The GT and BGT OBJECT to this application and recommend that your officers refuse it.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Cadhay	Devon	E18/0662	II	<p>PLANNING APPLICATION Construction of dwelling. Three Corners, Coombelake, Ottery St Mary EX11 1NW. RESIDENTIAL</p>	<p><b>CGT WRITTEN RESPONSE 03.01.2019</b></p> <p>Thank you for consulting The Gardens Trust on the revised plans for 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.</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 are pleased to note that the application is now for a bungalow, rather than a 'dormer bungalow'. The lower roof pitch will reduce the impact on Cadhay.</p> <p>Yours faithfully John Clark</p>
Bicton	Devon	E18/1336	I	<p>PLANNING APPLICATION Construction of a summerhouse/shed. 5 The Drive, Bicton, East Budleigh, Budleigh, Salterton EX9 7BH. GARDEN BUILDING</p>	<p><b>CGT WRITTEN RESPONSE 20.01.2019</b></p> <p>Thank you for consulting The Gardens Trust on the above application.</p> <p>Bicton is a site of national importance, as signified by its inclusion at grade I on the Historic England Register of Parks and Gardens of special historic interest . This is a highly selective list and now includes almost 1,650 sites. The National Planning Policy Framework (March 2012) sets out that Registered parks and gardens are designated heritage assets of the highest significance.</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. The Devon Gardens Trust is a member of The Gardens Trust and responds to consultations in the County of Devon.</p> <p>The application is for a summerhouse/shed behind a high fence which would be seen in juxtaposition with Sidmouth Lodge, listed grade II*, and</p>

					<p>the world famous monkey puzzle avenue approach to Bicton House. Sidmouth Lodge is one of the finest lodges in England, marking the entrance to the grade I Registered park and garden of Bicton. Immediately behind Sidmouth Lodge is the drive to Bicton House, flanked to north and south by four pairs of houses set behind wide lawns, 50m along the drive is the avenue of monkey puzzle trees, originally planted in 1843-4 by James Veitch's men under his direction, using plants raised from seed collected for the Veitch nursery by William Lobb (1809-63). The avenue, some 400m in length, was widened in 1852. Several of original trees planted on mounds survive, while new specimens have been introduced to fill gaps</p> <p>The application site is the side garden of one of the 4 pairs of semi-detached houses which were built by Bicton College of Agriculture in the 1960s for farm workers. The construction of the houses involved the felling and removal of eight of the monkey puzzle trees (<i>Araucaria auracana</i>). The famous avenue is believed to be the longest avenue of these trees in the world.</p> <p>With the merger of Bicton College into the Cornwall Group of Colleges, the 8 houses were sold to a developer and since then have been sold on to individual private owners. It is suggested that it would be appropriate for EDDC to make an Article 4 Direction to remove the permitted development rights from these houses.</p> <p>One of the core planning principles of the NPPF is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p> <p>Para 126 of the NPPF states '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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'</p>
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					<p>should be undertaken before this application is determined.</p> <p>In conclusion, we are concerned about the adverse visual impact of the proposed development which would cause substantial harm to the significance of Bicton and Sidmouth Lodge. We recommend that your authority should refuse consent for this proposal as it clearly conflicts with national planning policy with regard to the conservation of the historic environment.</p> <p>Yours faithfully John Clark Conservation Officer</p>
East Devon and Blackdown Hills Landscape Character Assessment	Devon	E18/1365	n/a	LOCAL PLAN Draft Landscape Character Assessment consultation	<p><b>CGT WRITTEN RESPONSE 16.01.2019</b></p> <p>Thank you for your email of 6 December 2018, consulting the Devon Gardens Trust on the East Devon and Blackdown Hills Landscape Character Assessment.</p> <p>The Devon Gardens Trust would like to congratulate you on this excellent report. We would suggest that perhaps mention should be made of the contribution that historic designed landscapes particularly those in the English Landscape Style associated with many of country houses and country estates in East Devon have made to the landscape character of the County.</p> <p>Yours sincerely John Clark Conservation Officer Devon Gardens Trust</p>
East Devon Heritage Strategy	Devon	E18/1367	n/a	LOCAL PLAN Draft Heritage Strategy Consultation	<p><b>CGT WRITTEN RESPONSE 16.01.2019</b></p> <p>Thank you for your email of 28 November 2018, consulting the Devon Gardens Trust on your Draft Heritage Strategy.</p> <p>The Devon Gardens Trust would like to congratulate you on this initiative but we are a little surprised that, whilst historic designs landscapes on the Historic England Register of Parks and Gardens of special historic interest in England are mentioned in your Draft Strategy, there is no mention of the Devon Gazetteer of Parks and Gardens of local historic interest.</p> <p>In the section on The Parks and Gardens of East Devon, we would suggest that a new paragraph should be added after para 2.35, to refer to the Devon Gazetteer of Parks and Gardens of local historic interest, as follows: 2.36. In addition to the eight parks and gardens included in the Historic England Register, the twenty five sites listed below are included in the Devon Gazetteer of Parks and Gardens of local historic interest as</p>



					<p>important designed landscapes in the local context of Devon:</p> <p>The Barn, Exmouth  Bovey House, Beer  Burrow Farm Gardens, Dalwood  Lympstone Manor (previously Courtlands), Exmouth  Escot, Talaton  Exmouth Seafront Gardens  Faringdon House  The Grange, Broadhembury  Gulliford Burial Ground, Lympstone  Knightstone, Ottery St Mary  The Knowle, Sidmouth  Lee Ford, Budleigh Salterton  Nutwell Court, Woodbury  Plymtree Manor  Poltimore House  Pynes, Upton Pyne  Sand, Sigford  Shute House  Shute Barton  Sidbury Manor  Stedcombe Manor, Axmouth  Tracey House, Awliscombe  Widworthy  Wiiscombe Park, Southleigh  Hembury Fort House, Buckerel</p> <p>We would suggest that the above sites should be shown on the East Devon Heritage and Landscape Designations map.</p> <p>Poltimore House, Shute House &amp; Shute Barton, Sidbury Manor and Widworthy are considered to be of national significance and are important enough to be included by Historic England on the Register of Parks and Gardens of Special Historic Interest. The Devon Gardens Trust is in the process of applying to Historic England to add Sidbury Manor to the Register.</p> <p>In the section on Undesignated heritage assets in East Devon para 2.49, we would suggest that the Devon Gazetteer of Parks and Gardens of local historic interest should be mentioned.</p> <p>The Devon Gazetteer of Parks and Gardens of local historic interest forms</p>
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					<p>part of the Historic Environment Record maintained by Devon County Council's Historic Environment Team. The Devon Gardens Trust has added more detailed information on all the above sites to the Historic Environment Record. I would be happy to send this information to you for your Register of Heritage Assets.</p> <p>The Devon Gazetteer of Parks and Gardens of local historic interest evolved from the Register Review Project for Devon that English Heritage commissioned the Devon Gardens Trust to carry out in 1999; as a result of which fifteen sites in the County were added to the Register, including Connaught Gardens in Sidmouth.</p> <p>The Devon Gazetteer of Parks and Gardens of local historic interest was compiled from the knowledge of key members of the Trust, supported by the examination of OS Maps and texts. These included The Buildings of England: Devon by Cherry and Pevsner (1991), The Garden History of Devon by Dr Todd Gray (1995), Devon Gardens: an Historical Survey, edited by Steven Pugsley (1994), Devon Country Houses and Gardens Engraved by Dr Todd Gray (Vol. 1: 2001) and more recently the DevonThe Art of the Devon Garden by Dr Todd Gray (2013).</p> <p>The sites on the Devon Gazetteer satisfy one or more of the following criteria:</p> <ul style="list-style-type: none"> <li>The site illustrates some particular aspect of the history of gardens, designed landscapes, parks, cemeteries, horticulture or places of recreation</li> <li>The site provides an example of a particular designer of note</li> <li>The site has features from a particular period or style</li> <li>The site has known garden archaeological significance but has not necessarily been excavated</li> </ul> <p>We would also suggest that the Devon Gardens Trust should be included in the list of local history organisation in Appendix 3, together with the Devon Historic Buildings Trust and the Devon Historic Churches Trust</p> <p>We hope that the above comments are helpful and we would be happy to work with you in developing the Heritage Strategy for East Devon.</p> <p>Yours sincerely John Clark Conservation Officer Devon Gardens Trust</p>
Rousdon	Devon	E18/1373	II	PLANNING APPLICATION Proposed demolition of	<p><b>CGT WRITTEN RESPONSE 25.01.2019</b></p> <p>Thank you for consulting the The Gardens Trust on the above application.</p>

				<p>workshops and the erection of a 3 bedroom dwelling. Land At The Paddock, Rousdon. DEMOLITION, RESIDENTIAL</p>	<p>Rousdon is a site of national importance, as signified by its inclusion on the Historic England Register of Parks and Gardens of special historic interest .This is a highly selective list, and includes almost 1650 sites. The National Planning Policy Framework sets out that Registered parks and gardens are designated heritage assets of the highest significance.</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. The Devon Gardens Trust is a member of The Gardens Trust and responds on its behalf to consultations in the County of Devon.</p> <p>We have studied the original plans for the Estate by Robert Marnock, (attached below), the Planning and Design Brief for Rousdon, prepared and approved by your Council, the Historic England map and entry, and the planning application documents on your web site. We have visited the site on several occasions and in response to the current application. We would ask you consider the following comments:</p> <p>The garden at Rousdon was designed by Robert Marnock (1800-89), one of the leading landscape designers of the nineteenth century. In 1833 he won the competition to design the Sheffield Botanical Garden, of which he then became curator. In 1840 he won the competition to design the Royal Botanical Society's garden in Regents Park and similarly became curator there in 1841. After his retirement in 1860 he returned to garden design and Rousdon was one of his many commissions for private clients. William Robinson who founded The Garden magazine, lauded Robert Marnock as the greatest landscape gardener of the day.</p> <p>The listing description of the walled garden is as follows:  GV II Kitchen garden walls and lodge. Circa 1880 by Sir Ernest George and T. Vaughan. Walls enclosing large rectangular garden. Red brick with brick coping and large ramped buttresses on outer sides. Moulded rubbed brick arches to entrances on east and west sides, with moulded brick spandrels and frieze to eaves cornice with half hipped tiled roof over. Small pavilions on south-east and south-west corners with pyramidal roof. Moulded brick piers on north-east and north-west corners with stone finials in the form of an owl and a stork. Including single storey stone lodge at north-west corner with timber-framing in gable and tiled roof.</p> <p>The walled garden with its impressive buttressed stone walls and two belvedere pavilions and buttressed walls is perhaps the most magnificent of its type. The impression from the south side, looking east towards the</p>
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					<p>parkland and the sea, is reminiscent of a medieval walled town. The layout of the lanes around the walls and the planting to the west and east of the walled garden are the same (or similar) to those shown on Robert Marnock's plan; to the south a a low stone wall was constructed instead of planting. The lane on the west side of the walled garden with its 4ft wide bay hedge is the same (or similar) to how it was originally envisaged by Robert Marnock. The application site is to the west of the walled garden and the lane and is bounded by an established Bay hedge, some 4ft wide. The site is at a lower level than the lane as can be seen from the photographs. the contains two large timber sheds which are visible from the gateway to the south, but only just visible from the lane, above the Bay hedge. The proposed dwelling would immediately abut the lane, necessitating the removal of the Bay hedge, thereby completely changing the character of the lane. We consider that it is essential that the Bay hedge should be preserved in order to retain the original character of Marnock's design for the setting of the walled garden. We consider that current proposals for the proposed dwelling would therefore have to be redesigned. We would therefor ask your Officers to negotiate with the applicant to achieve a revised proposal which would retain the Bay hedge and be more appropriate for this visually and historically important location. It is essential that the highest possible standard of design is achieved, In view of the sensitive nature of the site. One of the core planning principles of the NPPF is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. NPPF paragraph 132 states that the more important the heritage asset the greater the weight that should be given to their conservation. It should be also noted that 'substantial harm to a Grade II park or garden should be exceptional'. NPPF paragraph 133 states that 'where a proposed development will lead to substantial harm to, or total loss of significance of, a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.' The proposed development would not be a substantial public benefit. The Gardens Trust considers that the proposal for the erection of a 3</p>
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					<p>bedroom dwelling on land now occupied by workshops at The Paddock, Rousdon, in its current form, the would cause substantial harm to the significance of the walled garden listed grade II and the grade II Registered landscape.</p> <p>The design of the proposed dwelling, involving the replacement of an established Bay hedge by the wall of the dwelling, would be contrary to the historic layout of the site as shown on Robert Marnock's plans.</p> <p>In conclusion, we are concerned about the adverse visual impact of the proposed development, resulting in the loss of the Bay hedge, would cause substantial harm to the significance of the grade II Registered landscape of Rousdon and the grade II listed kitchen garden walls. We urge your Council to refuse consent for this proposal as it clearly conflicts with national planning policy with regard to the conservation of the historic environment.</p> <p>Yours faithfully John Clark Conservation Officer Devon Gardens Trust</p>
Stanmer Park	East Sussex	E18/1318	II	<p>PLANNING APPLICATION Erection of 2no seven storey buildings and 4no six storey buildings (including lift overruns) to provide 250no residential dwellings (C3), 162 car parking spaces, 365 cycle parking spaces, new access from Coldean Lane; associated landscaping incorporating areas of play/amenity space/active learning and substations. Land To The East Of Coldean Lane, North Of Varley Halls, South Of The A27. RESIDENTIAL</p>	<p><b>CGT WRITTEN RESPONSE 04.01.2019</b></p> <p>Thank you for consulting the Sussex Gardens Trust (SGT). The Trust has also been notified by The Gardens Trust; the statutory consultee on matters affecting registered historic parks and garden landscapes.</p> <p>The Sussex Gardens Trust seeks to promote the protection, enhancement and appropriate management of designated designed historic park and gardens in Sussex, including the grade II registered Stanmer Park, in which the site of this application lies.</p> <p>The SGT has read the submitted plans and supporting documents with care. It is just possible that these blocks at 7 storeys and on relatively high ground, will be viewed from the pathways on the edge of the Stanmer Great Wood, so they may be considered harmful to the setting and enjoyment of that rural walk. Nevertheless, the Trust accepts that any harm to the Park would be less than substantial.</p> <p>However, the height and form of this development within Stanmer Park seems wholly out of place, and obtrusive when compared to the way the Coldean housing suburb nestles in its downland fold. A landscape solution in which a lower development merges into the hillside would be more in keeping.</p> <p>Conclusion</p>

					<p>The Trust has reservations about any major development of this site since it will result in the loss of an area of the Registered Park, even though the harm may be less than substantial. Moreover, the height and form of the present proposals seems out of place in the downland setting.</p> <p>Yours faithfully  Jim Stockwell On behalf of the Sussex Gardens Trust.</p>
Kidbrooke Park	East Sussex	E18/1346	II	<p>PLANNING APPLICATION  REPLACEMENT OF EXISTING DWELLING (MOBILE HOME) AND EQUESTRIAN BUILDINGS WITH A NEW DWELLING OF EXCEPTIONAL QUALITY AND DESIGN (PARA 79 HOUSE), GARAGE &amp; STORE, STABLE BLOCK WITH ANCILLARY LIVING ACCOMMODATION ABOVE, LANDSCAPE ENHANCEMENTS AND ASSOCIATED WORKS TO INCLUDE THE REFURBISHMENT OF EXISTING BRIDGES AND THE ENLARGEMENT OF PONDS. TYLEBROOK FARM, PRIORY ROAD, FOREST ROW RH18 5HR. HYBRID</p>	<p><b>CGT WRITTEN RESPONSE 14.01.2019</b></p> <p>The Gardens Trust (GT) is the statutory consultee on matters concerning registered parks and gardens, and is now working closely with County Garden Trusts such as Sussex Gardens Trust (SGT) regarding commenting on planning policy and planning applications. Representatives of SGT have read the submitted plans and supporting documents with care and our comments are shown below.</p> <p>Background</p> <p>Almost the whole of the site sits within the boundary of Kidbrooke Park which is included on Historic England (HE) Register of Historic Parks and Gardens; the site has a Grade II designation and additionally is included on the HE Heritage At Risk Register see <a href="https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/26114">https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/26114</a>.</p> <p>Comments (i) Demolition of existing and construction of a new dwelling, garages, and stables</p> <p>Nearly all of the new structures are to be built in the western part of the registered area close to Priory Road. The open ground to the immediate E and SE (which lies on the WNW boundary of the registered area) comprises a rounded ridge (referred to in the register text on the National Heritage List as the central ridge), the crest of which cuts off any views from the house, gardens and immediate designed parkland to this WNW boundary. The key/significant views from the main designed part of Kidbrooke Park are to the south and south-east, although these too are now mostly truncated by C20 tree cover. Consequently, from the point of view of impact on the significant views and character of the registered area, the proposed development would probably be minimal. The Trust therefore raises no objection to the proposed new buildings and welcomes the proposed tidying up and/or removal of unsightly modern features. (ii) Conservation, restoration and enhancement of the landscape</p> <p>The Trust very much welcomes the vision to restore this landscape which is associated with Humphry Repton.</p>

					<p>However, the section of the documents that deal with historic aspects of the Landscape fail to describe adequately the extensive evidence of Repton’s work at Kidbrooke, and the use of the word ‘rumour’ to suggest it was a Repton Landscape is misleading.</p> <p>While we agree that there is no known evidence that Repton worked on the north-west side of the ridge separating the pleasure grounds of Kidbrooke House from the land beyond (where the new house is to be built), it is generally accepted by experts that Repton’s designs for the Kid stream were carried out – there is both archival and ground-based field evidence. There is archival evidence for the ridge itself which forms the backdrop to the setting and pleasure grounds of the house – see images below after Repton had advised, showing significant planting along the spine of the ridge.</p> <p>It would seem logical to ensure that any repair and new design work on the Tyle brook with its ‘Lovers Walk’ should reference that on the Kid. The comment in the application ‘When the estate was whole it would have been possible to walk from Kidbrooke Park through to Lovers’ Walk (red path), up to the Ashdown Forest and then back to the Park via the more formal watercourses laid out in the gardens (blue path)’ supports the likelihood of the Tyle being a feature that Repton worked on. The Trust suggests the case for these proposals in this sensitive landscape would be strengthened if the application demonstrated a greater understanding of the whole of Kidbrooke’s landscape development and especially of the features that are likely to have been Repton’s work.</p> <p>Additional information is shown in a recent book published in Nov 2018 by the Sussex Gardens Trust, “Humphry Repton in Sussex” , which includes an detailed article on Kidbrooke Park (pages 66-76) – ref ISBN 978-1-5272-3341-6 available from <a href="mailto:information@sussexgardenstrust.org.uk">information@sussexgardenstrust.org.uk</a> .</p> <p>Nevertheless the idea “...to create a series of exciting surprises that are slowly revealed as the full grandeur of the landscape is uncovered”, as described in the Design and Access Statement (para 2.20), is entirely in keeping with Repton’s style.</p> <p>Summary</p> <p>SGT has no objection to the proposed new structures and very much welcomes the proposals for the landscape. However, the SGT considers the case for the application in this sensitive landscape would be strengthened if it demonstrated a greater understanding of the whole of Kidbrooke’s landscape development and especially of the features that are likely to</p>
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					<p>have been Repton's work. Yours faithfully Jim Stockwell For and on behalf of Sussex Gardens Trust</p>
<p>Willesden Jewish Cemetery (United Synagogue Cemetery), Roundwood Park</p>	<p>Greater London</p>	<p>E18/1145</p>	<p>II</p>	<p>PLANNING APPLICATION Construction of a single storey storage and welfare building. Willesden United Synagogue Cemetery Lodge, Glebe Road, London. MAINTENANCE/STORAGE/OUTBUILDING, CEMETERY</p>	<p><b>CGT WRITTEN RESPONSE 02.01.2019</b> I have been in touch with the applicants over Christmas and now have adequate information to support their proposal and would like to withdraw the LPGT objection. We have discussed the need to provide better supporting information in future so that this situation doesn't arise again. thanks very much, Linden Groves Volunteer On behalf of the Planning and Conservation Working Group London Parks and Gardens Trust</p>
<p>Ethelbert Close, Bromley</p>	<p>Greater London</p>	<p>E18/1363</p>	<p>N</p>	<p>PLANNING APPLICATION Demolition of 1-40 Ethelbert Close, 2 Ethelbert Road, 102-108 High Street and miscellaneous buildings to the north of Ethelbert Close, and the redevelopment of the site (max height 17 levels) to provide a mixed use scheme comprising 410 residential units with a mix of Use Class A1, A2, A3, B1, D1, D2 uses at ground floor (part). New vehicular access from Ethelbert Road. Associated basement car and cycle parking. Car parking, access and servicing arrangements at Churchill Way. Public realm works including Library Gardens and ancillary development. 1 Ethelbert Close, Bromley BR1 1JB. MAJOR HYBRID</p>	<p><b>CGT WRITTEN RESPONSE 03.01.2019</b> The London Parks and Gardens Trust (LPGT) wishes to object to this application – we trust the reasons set out in this letter explain how we have reached this conclusion. The Gardens Trust were recently made aware of the above planning application. We write as the Planning &amp; Conservation Working Group of the London Parks &amp; Gardens Trust (LPGT). The LPGT is affiliated to The Gardens Trust (TGT, formerly the Garden History Society and the Association of Gardens Trusts). The LPGT is the gardens trust for Greater London and makes representations on behalf of TGT in respect of sites of historic significance. Gardens and Library Gardens Church House and Library Gardens were originally separate open spaces, connected in 1927. Church House Gardens was formerly the private garden of Church House, and was opened to the public in 1926. The house and parish church were destroyed by bombing in 1941; the gardens were preserved as public open space and landscaped as a single space since this time. The Gardens are frequently referred to as a single space in documentation, usually as Church House Gardens. The gardens have an enclosed and tranquil character, with tree and shrub planting lining the boundaries and urban development beyond. The Gardens retain a semi-formal layout, including a lake and planted slopes. Bromley Town Centre (BTC) Conservation Area The application boundary includes Library Gardens, which lies within the BTC Conservation Area designation. The remaining application boundary falls outwith the conservation area, however, comprises land adjacent to, and within the setting of, the designation.</p>



					<p>The conservation area comprises several sub-areas, as identified by the BTC Conservation Area SPG (2001); most relevant to the site is the Church House Gardens sub-area.</p> <p>The significance of the Church House Gardens sub-area is partly derived from its open and verdant character as a consequence of being largely public open space. The open space's boundary planting and consequent enclosure give it a distinct character, very separate from the surrounding townscape.</p> <p>The Garden's historic association with the development and evolution of Bromley as a settlement as well as the aesthetic qualities it lends to the sub-area are also notable.</p> <p>These qualities combine to comprise the heritage asset's special interest and significance, which there is a duty to preserve and enhance (Section 69 of the Planning (Listed Building and Conservation Areas) Act 1990).</p> <p>The Bromley Town Centre Conservation Area Appraisal (Draft 2) February 2010 infers that enclosure comprises part of the Garden's existing character. It notes that there is a strong separation between Church House Gardens (which shares a unified character, history, planting scheme, and layout with Library Gardens) and the surrounding townscape, setting out that:</p> <p>"Although these High Street buildings are large they are mostly well screened from view by the trees in Church House Gardens."</p> <p>Church House / Library Gardens</p> <p>Both Church House and Library Gardens are considered non-designated heritage assets (and are considered as a single unified space by the LPGT). They should, in our opinion, be afforded an intrinsic historic significance by virtue of their historic role in the evolution of the settlement and aesthetic / designed qualities. Paragraph 197 of the NPPF, 2018, sets out that:</p> <p>"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."</p> <p>The enclosed form of Library Gardens, through planting, promotes a strong degree of tranquillity, a quality of space that is afforded some protection in the NPPF (2018). The dominance of vegetation to create that enclosure and tranquillity, combined with soft ground cover, as opposed to hard landscaping, comprises the Garden's aesthetic, evidential and historic</p>
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					<p>significance. The border and perimeter planting is based on the concepts of the Arts and Craft movement when landscape design sought to provide shelter and relief from the surrounding townscape - typical of so many public open spaces created in the late 19th / early 20th century. This is noted in the applicant's Heritage Statement:</p> <p>"The south-east border of Church House Gardens, running along the north and west boundary of the Site, is heavily wooded with mature trees. A break in the trees is provided only by the pedestrian footpath that runs parallel with the northern border of the Site, providing access to the high street. At present, there is no direct access to the Site along this boundary" (Paragraph 9.22)</p> <p>"The park areas have a tranquil and calm setting, albeit the observer is aware of the busy town centre beyond both in its visual manifestation (including Churchill Theatre) and the noise and bustle created by the busy environment beyond. The Proposed Development would form part of this backdrop, providing a high magnitude of visual impact" (Paragraph 8.18)</p> <p>No assessment of the planting in the gardens has been provided by the applicants so it is not possible at this time to state whether the planting presents a degree of evidential value.</p> <p>Proposals</p> <p>It is proposed to redevelop land on Ethelbert Close and Churchill Way and one unit on High Street with seven residential blocks (410 residential units) of up to 13 storeys adjacent to the open space, some with commercial frontages onto the Gardens. It is proposed to redevelop the Gardens as separate hard-landscaped spaces, named 'Promenade', 'Library Gardens' and 'Theatre Plaza'.</p> <p>Harm Associated with the Proposals</p> <p>BTC Conservation Area</p> <p>The Trust is of the opinion that the intrinsic heritage values of the conservation area, as they relate to Library and Church House Gardens, will be harmed. The loss of planting to the south side of the open space will remove the strong historic separation between the open space and the surrounding townscape. This will be exacerbated by the introduction of commercial frontages and hard landscaping. The overall impact will be to urbanise this area of the Gardens with hardscape, café tables and advertising etc, resulting in a loss of aesthetic and historic significance associated with the space's existing edge of park character. There will naturally be a loss of tranquillity, which is a material consideration as set</p>
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					<p>out in the NPPF (Paragraph 180 (b)).</p> <p>The loss of enclosure to the Gardens will open it up to the extent that the setting of the conservation sub-area will be harmed, becoming dominated by the height and proximity of the proposed residential development, which is proposed to be 13 and 11 storeys adjacent to the gardens, rising to 16 storeys to the south. The Historic England document GPA3: Setting identifies five steps towards assessing the implications of development on the setting of heritage assets, including assessing the contribution the asset's setting makes to its significance and the effect of the proposed development on that significance. In this case the setting's contribution is that it allows users of the public space to physically 'escape' the townscape, it being largely screened by soft landscaping; above the planting the user sees little more than open sky with only elements of buildings – such as the theatre – partly visible. The proposed development will remove that sense of escape, bringing the townscape into the gardens and foreshortening views of the skyscape; this will have a profound effect on the users' experience.</p> <p>This is noted in the applicant's heritage statement, below, and shown in views montages 6, 20 and 21:</p> <p>"the Proposed Development would be readily visible from the Church House Gardens sub-area ... The Proposed Development would form part of this backdrop, providing a high magnitude of visual impact..." (Paragraph 8.18)</p> <p>The Trust disputes the applicant's claim that this would simultaneously be "reinforcing the character and appearance of the town centre parkland." (Paragraph 8.18). The open space will see marked change in character and lose essential facets of its historic significance.</p> <p>Library Gardens</p> <p>The non-designated heritage asset of the Gardens will be similarly harmed. The open space will be changed from one of strong planting and late 19th/early 20th century municipal-style open space to a modern hardscaped adjunct to the proposed development. The sense of separation between townscape and landscape will be completely lost. The proposed hardscaping is designed to break down Library Garden visually and physically, and separate it from Church House Gardens so that it no longer reads as public open space, harming its historic relationship with the neighbouring Gardens so and reading as semi-private townscape. It is likely that several mature trees, which are de facto TPOs in the</p>
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					<p>conservation area, will be removed and not replaced in the more urban scheme. The significance if individual specimens has not been considered by the applicants.</p> <p>The intrinsic value of this non-designated heritage asset as a whole has not been considered by the applicants.</p> <p>Given the above, The LPGT objects to application 18/02181 on the following grounds:</p> <ul style="list-style-type: none"> <li>• The proposed development is harmful to the historic character, which it fails to preserve and enhance, of the BTC Conservation Area</li> <li>• The proposed development is harmful to the setting of the BTC Conservation Area</li> <li>• The proposed development is harmful to the heritage values of the non-designated heritage asset of the Library Gardens</li> </ul> <p>We therefore recommend your council refuse it. It is the Trust's position that the proposals amount to major harm to the historic significance of both designated and non-designated heritage assets.</p> <p>Yours Sincerely, Helen Monger</p> <p>For and on behalf of the Planning &amp; Conservation Working Group planning@londongardenstrust.org</p>
Victoria Tower Gardens	Greater London	E18/1437	II	<p>PLANNING APPLICATION</p> <p>Installation of the United Kingdom Holocaust Memorial and Learning Centre including excavation to provide a basement and basement mezzanine for the learning centre (Class D1); erection of a single storey entrance pavilion; repositioning of the Horseferry Playground and refreshments kiosk (Class A1); repositioning of the Spicer Memorial; new hard and soft landscaping and lighting around the site; and all ancillary and associated works. (The application is accompanied by an Environmental Statement (ES)</p>	<p><b>TGT WRITTEN RESPONSE 27.01.2019</b></p> <p>The Gardens Trust (GT) is the Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens. We have carefully read and reviewed the proposals put forward at the public exhibition from 5th to 8th December 2018 by Adjaye Associates, Ron Arad Architects and Gustafson Porter + Bowman as well as the documents accompanying the current planning application for the proposed UK Holocaust Memorial and Learning Centre to be sited in the Grade II Victoria Tower Gardens, Westminster. Victoria Tower Gardens also lie within the Houses of Parliament World Heritage Site.</p> <p>The GT wholeheartedly endorses the principles and reasoning behind the creation of this important monument: "There is no better gift we can pass to future generations than the knowledge of where hatred, unchecked, can lead." The Grade II* Buxton Memorial erected to commemorate the 1807 Abolition of Slavery Act, already fulfils this remit very poignantly, deliberately positioned on an axis down Dean Stanley Street towards the church of St John Smith Square, strongly reinforcing the religious message</p>

				<p>which may be viewed with the application documents). The Victoria Tower Gardens, Millbank, London SW1P 3YB. VISITOR ATTRACTION, EDUCATION</p>	<p>of humanity.  However we have serious reservations about the proposed siting of the Holocaust memorial in Victoria Tower Gardens. The Government’s reasoning is that ‘the historical, emotional and political significance of Victoria Tower Gardens substantially outweighed all other locations...’ We disagree : we believe that is not a sound planning argument. The initial decision to favour this location was fundamentally irrational in being politically led, without reference to normal planning considerations. Victoria Tower Gardens are not part of a Conservation Area but they unquestionably form a key part of the setting of the Palace of Westminster and Westminster Abbey World Heritage Site, which they directly abut. There are no additional planning controls associated with a WHS but at the very least we suggest that the basic Conservation Area test should be applied to an application which directly affects views into and out of the WHS on a site directly abutting it, namely that development must preserve or enhance the character or appearance of the site.  In addition to the slavery memorial this small public park also contains the Emmeline Pankhurst statue (Grade II) commemorating women’s fight for and achievement of voting rights, as well as the Burghers of Calais sculpture by August Rodin (Grade I), which commemorates the bravery of six citizens during the Hundred Years War. The playground is also of historical significance, being a gift of the philanthropist Henry Gage Spicer (see London Parks &amp; Gardens Trust Victoria Tower Gardens Statement of Significance Paras 4.5 4.6 &amp; 4.7 pp.12-13). It is contained within metal railings designed by artist Chris Campbell depicting events such as the Great Fire of London, Lord Nelson’s funeral barge and views of the River Thames. The Spicer Memorial bears reference to Mr Spicer’s act of generosity and philanthropy. We suggest that the site is already overloaded with symbolism, and to add a monument of such magnitude, gravity and size, would diminish the importance and meaning of the other monuments.  We would also question the uneasy aesthetic juxtaposition of the enormous 10.5m fins next to the Buxton Memorial, and the enclosure of the Memorial Courtyard by tall hedging shown in an image entitled ‘View of Buxton and Holocaust Memorials together with Houses of Parliament’ . All sense of an uncluttered, calm expanse of public open space in the centre of the city, with long views in several directions is totally lost amongst the mass of different textures and activity : visually dominant tall</p>
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					<p>fins, hedges, pathways, pedestrians, trees etc competing with the solid dignity of the Houses of Parliament and the Victoria Tower in the background. In destroying its tranquility, the proposal will fundamentally damage the character of this part of the setting of the WHS.</p> <p>The Proposed Site Plan indicates that the path leading from the Buxton Memorial towards Dean Stanley Street is to be closed off by the hedge/barrier surrounding the Memorial Courtyard, eliminating entirely this enormously important vista and removing one of the main threads of the monument's significance. The replacement path is further south with no alignment to Dean Stanley Street. The GT strongly objects to this.</p> <p>Another concern relates to the suitability of this sombre monument close to an historically important, and still much used playground. It is unthinkable for example, that the World Trade Center Memorial commemorating the death of 2977 people on Sept 11th 2001 (as opposed to millions in the Holocaust) would be placed next door to a playground. The two uses of a site are entirely incompatible.</p> <p>The GT has read Bartlett Consulting's Arboricultural Impact Assessment of December 2018. We are glad to note that there were significant design modifications to the proposed siting of the memorial as a result of Bartlett's investigations and that "the 'critical' root system for the London plane trees which provides anchorage and ... support will be unaffected by the identified pruning and proposed development." However this is qualified by their statement that 'we have been informed that there are no primary structural roots below 1.0 metre depth along the footprint of proposed development, with little or no fibrous feeding roots encountered in the area of investigations' (source unattributed). Bartlett state in their conclusion (p32) that root pruning will be necessary to some of the individual trees, "although root pruning may be considered 'harm' we have demonstrated this pruning to be within tolerable levels, and we have provided a programme of compensation and mitigation..." Although this comprehensive report does to some extent allay our fears, we remain concerned about the likely impact of the new memorial and adverse effects of the substantially increased likely footfall upon tree health, as Bartlett make clear that root pruning may result in canopy die-back. These carefully placed mature London plane trees make an enormous contribution to the streetscape and to the setting of the WHS and provide a sense of tranquility amidst the continual noise of traffic just outside the garden boundaries.</p>
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					<p>The proposals do not uphold the requirements of the Royal Parks' remit to 'protect, conserve and enhance the unique landscape, .... heritage and vistas of the eight Royal Parks in London' and whilst this does 'encourage wider access to them ... information, (and) education,' it can hardly be said to 'increase opportunities for enjoyment (and) delight, ... now and in the future.'</p> <p>While in principle we would like to support the project on a more suitable site, we strongly OBJECT to the proposal for this site</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
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 14.01.2019</b></p> <p>Thank you for consulting The Gardens Trust, statutory consultee, of which HGT is a member.</p> <p>The Heritage Statement (amended) does not properly consider the effect of the impact of the extension on the setting of the Benington Lordship designated heritage assets and thus does not accord that due weight. However, it would appear that the north elevation is now to be of flint, which we welcome. We therefore have no further objections to the proposal as described in the application documents..</p> <p>Kate Harwood</p>
Ashwell Neighbourhood Plan	Hertfordshire	E18/1362	n/a	NEIGHBOURHOOD PLAN Ashwell Regulation 14 Consultation	<p><b>CGT WRITTEN RESPONSE 03.01.2019</b></p> <p>Thank you for sending HGT the draft Neighborhood Plan for Ashwell. I have read it through and it is an impressive piece of work. The only comments I have on this are on the Historic Environment (7.2 page 40). There is a bias here towards the earlier periods, which is where the wealth of your heritage assets come from. However, I am very disappointed that you have not included historic parks and gardens in your list of designated heritage assets as you have the Jekyll Ashwell Bury which is on the HE Register. You will also have a range of other historic gardens which are of local interest which you should add to the heritage assets mentioned in policy 7.h. In other NP where I have been involved crucial views/settings of the heritage assets have also been considered to help identify those which need to be protected when future development looms. Perhaps it's not too late to mention those??</p> <p>Best wishes Kate Harwood Conservation &amp; Planning</p>

					Hertfordshire Gardens Trust
North Mymms Park	Hertfordshire	E18/1379	N	PLANNING APPLICATION Erection of marquee and internal alterations and repairs to Bothies building. The Bothies and Walled Garden, North Mymms Park, North Mymms AL9 7TR. WALLED GARDEN, MARQUEE	<p><b>CGT WRITTEN RESPONSE 28.01.2019</b></p> <p>The Gardens Trust, of which HGT is a member, have considered these proposals and the comprehensive documentation available. In our comment on 6/2018/1900/MAJ on 26 August 2018 we commented that this proposal would cause harm to the setting of the listed (Grade I) mansion and adjacent garden walls, adjacent listed (Grade II) stable block and other listed features.</p> <p>We consider that the current application does not address these issues and that the addition of the marquee would cause serious harm to the range of both buildings resulting in loss of significance. The scale and design of the marquee is not appropriate for a walled garden on a site of this quality. The proposed landscaping is of poor quality and would provide no mitigation for the dominance, both in size and in materials, of the marquee and the harm caused by lighting and other ancillary services. The additional parking in the former slips and the increased movement of traffic through the grounds would cause further harm.</p> <p>Kate Harwood</p> <p>We further noted in August that survey and archival work by HGT for an Environmental Stewardship scheme had raised the probability of park planting by William Robinson, due to the unusual mix and grouping of trees. This would be in addition to the known work by him in the pleasure gardens. This raises the significance of the gardens and grounds themselves which contribute to the setting and significance of the built features as well as being significant in their own right. HGT have included them in their List of Locally Important Gardens for the Welwyn Hatfield District.</p> <p>We recommend that this proposal be refused in the grounds of harm to the heritage assets on this site.</p>
Garden Cottage, Danesbury Park	Hertfordshire	E18/1401	N	PLANNING APPLICATION Outline permission for erection of 1 x dwelling with all matters reserved except access and layout. Garden Cottage, Danesbury Park Road, Welwyn AL6 9SE. RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 15.01.2019</b></p> <p>The location within the historic Danesbury estate of this application is part of the wider walled garden complex which contained glass houses and sheds, as shown on the late 19th century Ordnance Survey maps.</p> <p>If outline permission is granted we would recommend that an archaeological survey or watching brief to discover and record any traces of these structure be undertaken prior to or during development. We would also recommend that any dwelling granted permission should be low rise and small scale as illustrated in this application, to retain the</p>



					hierarchy of the great house and the working areas Kate Harwood
Essendon Country Club, Essendon	Hertfordshire	E18/1435	N	PLANNING APPLICATION Replacement windows to a Grade II listed building, the erection of 20 accommodation pods and associated access works, landscaping, tree planting and site infrastructure. Essendon Country Club, Bedwell Park, Essendon, Hatfield AL9 6HN. HOLIDAY ACCOMMODATION	<b>CGT WRITTEN RESPONSE 23.01.2019</b> We do not wish to comment on the proposals for alteration of the barns nor on the principle of installing cabins as outlined. We note that a number of fairly recently planted trees will be removed and perhaps opportunity should be taken to replant elsewhere. Historically there was an orchard associated with the farm as shown on 19th century maps, so provision of fruit trees would reflect the history of the site. Kate Harwood
1 Danesbury Park, Welwyn	Hertfordshire	E18/1509	N	PLANNING APPLICATION Reduce crown, T1 Cedar tree ,by 30% TPO864 (2018). 1 Danesbury Park, North Ride, Welwyn AL6 9SA. TREES	<b>CGT WRITTEN RESPONSE 28.01.2019</b> The application form refers to reports attached as to why this important tree, part of the historic Danesbury Park landscape, needs the work proposed. These documents do not appear on the planning website so we are unable to assess them. As no justification is given in the documents which are on the website we are unable to comment and would welcome further information to enable us to do so. Kate Harwood
Austen Lodge, Codicote	Hertfordshire	E18/1517	N	PLANNING APPLICATION Erection of detached single storey outbuilding for use as garage, car port and workshop in rear garden. Austen Lodge, Node Park, Hitchin Road, Codicote, Hitchin, Hertfordshire SG4 8TH. MAINTENANCE/STORAGE/OUTBUILDING	<b>CGT WRITTEN RESPONSE 29.01.2019</b> Although Comments on planning application 19/00074/LDCP are not being accepted on the North Herts website, The Hertfordshire Gardens Trust, a member of The Gardens Trust, statutory consultee, has serious concerns. We consider The Node to be one of the most important historic gardens in North Herts which is not nationally designated, and thus on the HGT List of Locally Important Historic Parks and Gardens. Although now in divided ownership and much altered, it still retains much of its historic nature and significance. Further development on this site will further reduce this further and the proposed development is overlarge, inappropriately sited and will cause harm to the setting of the historic North Lodge (now Austen Lodge). Further, as it is in the Green Belt, we consider that this is inappropriate development, not in accordance with the NPPF. Kind Regards Kate Harwood Conservation and Planning Hertfordshire Gardens Trust

Osborne	Isle of Wight	E18/1397	II*	PLANNING APPLICATION Variation of condition 2 on P/01263/16 to allow revised design to balcony. Osborne Cottage, York Avenue, East Cowes, Isle Of Wight PO32 6BD. BUILDING ALTERATION	<b>CGT WRITTEN RESPONSE 30.01.2019</b> Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. The Isle of Wight Gardens Trust (IWGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites and is authorised by the GT to respond on GT's behalf in respect of such consultations. Normally, the Isle of Wight Council would also inform the Isle of Wight Gardens Trust directly when there is an application within either a park/garden/designed landscape which is nationally registered or on the local list. This did not occur on this occasion. Having reviewed the application we raise no objection to the development being proposed as we believe it has no adverse impact on the designed landscape of the Grade II* registered park at Osborne within which it is located. John Brownscombe Chairman Isle of Wight Gardens Trust
Appuldurcombe	Isle of Wight	E18/1450	II	PLANNING APPLICATION Removal of condition 3 on P/01166/09 to allow property to be rented out. The Old Dairy, Appuldurcombe Farm, Appuldurcombe Road, Wroxall, Isle of Wight PO38 3EW. MISCELLANEOUS	<b>CGT WRITTEN RESPONSE 11.01.2019</b> IWGT Comment submitted online 11/01/2019 Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. The Isle of Wight Gardens Trust (IWGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites and is authorised by the GT to respond on GT's behalf in respect of such consultations. The Isle of Wight Council notified the Isle of Wight Gardens Trust of this application as it lies within the grade II registered historic park at Appuldurcombe. IWGT have welcomed the recent extensions of the registered site area and greatly expanded register description by Historic England, which reinforces the importance of Appuldurcombe as the only Isle of Wight 18th century parkland site associated with Lancelot 'Capability' Brown. We have provided comment on a series of planning applications seeking to vary conditions on consents relating to the Old Dairy and would draw your attention to these. In respect of the latest iteration we raise no objection to the suggested change as it will allow the property to be rented but requires it to be retained within the ownership of Appuldurcombe Farm

					<p>and not sold separately. This is of importance to us as experience tells us that the subdivision of ownership of Registered Parks and Gardens can result in a lack of a consistent approach to their conservation and management which in itself may lead to undesirable impact upon features which have led to its designation.</p> <p>John Brownscombe Chairman Isle of Wight Gardens Trust</p>
Osborne	Isle of Wight	E18/1530	II*	<p>PLANNING APPLICATION Proposed outbuilding. Barton Manor, Barton Estate, East Cowes, Isle Of Wight PO32 6LB. MAINTENANCE/STORAGE/OUTBUILDING</p>	<p><b>CGT WRITTEN RESPONSE 30.01.2019</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 listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. The Isle of Wight Gardens Trust (IWGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites and is authorised by the GT to respond on GT's behalf in respect of such consultations. Normally, the Isle of Wight Council would also inform the Isle of Wight Gardens Trust directly when there is an application within either a park/garden/designed landscape which is nationally registered or on the local list. This did not occur on this occasion. Having reviewed the application we raise no objection to the development being proposed as we believe it has no adverse impact on the designed landscape of the Grade II* registered park at Osborne within which it is located.</p> <p>John Brownscombe Chairman Isle of Wight Gardens Trust</p>
Stonyhurst College	Lancashire	E18/1274	II*	<p>PLANNING APPLICATION and Listed Building Consent Conversion of the fives court to a learning hub, ancillary to the retreat centre. Five Courts, Stonyhurst College, Avenue Road, Hurst Green. MISCELLANEOUS</p>	<p><b>CGT WRITTEN RESPONSE 09.01.2019</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 listed by Historic England (HE) on their Register of Parks and Gardens. The Lancashire Gardens Trust (LGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.</p> <p>We have reviewed the application documentation, but not visited the site for the purpose of reviewing this application. It is noted that the conversion of the former mill buildings to a Retreat has been implemented and the further works to convert the former fives court is intended to support the Retreat. The LGT supports the continued investment in this site</p>

					<p>and the reuse of the existing buildings.</p> <p>It is noted that the Design and Access Statement in 3.1 states that ‘visitors will access the Hub via the road by the Mill Cottages past the Christian Heritage Retreat Centre to the car parking area.’ This is welcomed, however later in the Statement, in paragraph 7.6, it is added that the vehicular access to the site will be as approved in applications 3/2017/0160 and 0161. Whilst we cannot alter approvals which have already been granted, we note (with some relief) that the vehicular access referred to has not yet been constructed and we encourage the College to continue using the current vehicular arrangements from within the College’s existing routes. Our concerns remain about the adverse impact which would arise from the construction and use of the new access road covered by the 2017 applications, and if this can be postponed indefinitely, this would be preferable.</p> <p>If there are any matters arising from this letter please contact me</p> <p>Yours faithfully</p> <p>Stephen Robson S E Robson BSc BPhil MA(LM) DipEP CMLI MRTPI</p>
Stonyhurst College	Lancashire	E18/1440	II*	<p>PLANNING APPLICATION Repairs to the clairvoie wall in the gardens of Stonyhurst College. Stonyhurst College, Avenue Road, Hurst Green BB7 9PZ.</p> <p>REPAIR/RESTORATION</p>	<p><b>CGT WRITTEN RESPONSE 18.01.2019</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 listed by Historic England (HE) on their Register of Parks and Gardens. The Lancashire Gardens Trust (LGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT’s behalf in respect of such consultations.</p> <p>We have reviewed the application documentation, but not recently visited the site for the purpose of assessing this application. This planned repair work to the clairvoie wall is long outstanding and is welcomed. We support the application.</p> <p>If there are any matters arising from this letter please contact me, by email Stephen.e.robson@btinternet.com.</p> <p>Yours faithfully</p> <p>Stephen Robson S E Robson BSc BPhil MA(LM) DipEP CMLI MRTPI Chair, Conservation &amp; Planning Group</p>
St Mary's Hospital, Stannington	Northumberland	E18/1183	II	<p>PLANNING APPLICATION Construction of three dwellings Location Land At Strathmore St Marys Hospital Drive,</p>	<p><b>TGT WRITTEN RESPONSE 17.01.2019</b></p> <p>Thank you for sending us copies of your Building Conservation Officer’s comments and those of Strutt &amp; Parker for the applicant. I have discussed these with our colleagues in the Northumberland Gardens Trust and must</p>

				Stannington, Northumberland. RESIDENTIAL	regretfully concur that the extent of modern development within the former St Mary's Hospital grounds has seriously compromised this historic site. We are disappointed that cumulative applications in the past have caused the setting and significance of this important site to be severely harmed. I checked all the applications mentioned by Strutt & Parker and the Gardens Trust was not notified about any of them. We would have highlighted the collective harm to the former St Mary's Hospital grounds and had they not been permitted perhaps we would not now find ourselves in the depressing situation. Yours sincerely, Margie Hoffnung Conservation Officer
Attingham Park	Shropshire	E18/1217	II*	PLANNING APPLICATION Application under Section 73A of the Town and Country Planning Act for the retrospective change of use from agricultural land to recreational use to include siting of play equipment, natural play area, field shelter, toilet block(s) and landscaping. Land North Of Attingham Park, Atcham, Shrewsbury, Shropshire. PLAY AREA, VISITOR FACILITIES	<b>CGT WRITTEN RESPONSE 28.01.2019</b> Thank you for your notification of the above amended scheme. Please note that this application is for land within the Historic England Registered Park & Garden boundary of Attingham Park, not for lands to the north of it as described on the Shropshire Council website. The Gardens Trust has already commented in detail on this retrospective application and we concur with their comments, namely: <ul style="list-style-type: none"> <li>• the continuing lack of a recent Conservation Management Plan for the parkland at Attingham, to guide future developments within the park, including the area covered by this application;</li> <li>• the apparent lack of understanding of the historic nature of the park at Attingham itself and of the significance of the land which has been developed as a play area within the context of the Registered Park;</li> <li>• the threat to the character of the Park potentially arising from possible future proposals for access or other development, connected with or arising from the current application.</li> </ul> Yours sincerely Mary King Chair, Shropshire Parks & Gardens Trust
Brogyntyn	Shropshire	E18/1316	II	PLANNING APPLICATION Landscape alterations including removal of trees, formation of new pedestrian bridge to lake island, formation of new vehicular access onto Whitewell Lane, repairs to existing listed	<b>CGT WRITTEN RESPONSE 14.01.2019</b> Thank you for your notification of the above amended scheme, which was forwarded to us from the offices of the Gardens Trust on December 27th 2018. This is a joint response on behalf of both the Gardens Trust, who are Statutory Consultees in matters relating to historic parks and gardens on the Historic England National Heritage List, and the Shropshire Parks and Gardens Trust.

				<p>building, erection of single storey side extension and detached garage and workshop and installation of package treatment plant affecting a Grade II Listed Building. Swiss Cottage, Whitwell Lane, Pant-Glas, Oswestry SY10 7PL. HYBRID</p>	<p>We note that the present notice as forwarded to us, refers only to Listed Buildings Consent for the above scheme. We assume that a full amended Planning Application will follow in due course.</p> <p>Brogyntyn Park is a Grade II Registered Park &amp; Garden and the Swiss Cottage itself is a Grade II Listed Building. The Swiss Cottage is aligned on the centre of the Castell Brogyntyn ring fort which is a Scheduled Ancient Monument situated less than two hundred metres away to the north and east and is which clearly intended to be visible from the Swiss Cottage itself.</p> <p>The current application is the latest in a number of proposals for the development of the Swiss Cottage and other areas of Brogyntyn Park, including the Grade II* Brogyntyn House.</p> <p>We are pleased to note that the present application includes a proposal for much needed repairs to the Swiss Cottage itself as well as a significantly reduced new extension to the rear of the building, and for the re-alignment of the proposed vehicular access route away from the bank of the adjacent lake, with the proposed garage and log store now located some way to the south of the principal building. We welcome these changes to the earlier proposals.</p> <p>Part of this proposed extension overlaps the south &amp; west corner of the Listed Building with large glass sliding doors proposed to its eastern elevation, which may be evident and potentially intrusive in views across the adjacent lake to the east, including from the Brogyntyn Ring Fort, as outlined above (see South East Elevation on drawing 1026-01 Dec 2018). We request that consideration be given to the inclusion of a small group of appropriate tree species be planted to screen this possibly detrimental view.</p> <p>We ask also that views from the east towards the proposed new garage and log store should be similarly screened by appropriate planting within the development site.</p> <p>We are concerned also that site may be sold in the future, contributing to the fragmentation of the Brogyntyn Park landscape, as well as potentially leading to pressure for additional development of the current site, including the removal of trees adjacent to the buildings. In particular, the use of Permitted Development Rights may make it difficult or impossible to protect the site from future development of this kind.</p> <p>We request therefore that if permission is granted for the current application, then a condition be attached to such permission, removing</p>
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					<p>future Permitted Development Rights from the property and making all proposed future tree works within the site, subject to planning permission.</p> <p>Yours sincerely Christopher Gallagher Vice Chair, Shropshire Parks &amp; Gardens Trust</p>
Chetwynd Park	Shropshire	E18/1361	II	<p>PLANNING APPLICATION Erection of 2no. dwellings. Land adjacent Chetwynd Lodge, Chetwynd Road, Chetwynd, Newport, Shropshire.</p>	<p><b>CGT WRITTEN RESPONSE 04.01.2019</b></p> <p>I am writing on behalf of the Gardens Trust and as Vice Chair of the Shropshire Parks &amp; Gardens Trust (SPGT), with regard to the above planning application. This has been forwarded to us at SPGT from the offices of the Gardens Trust, which is a Statutory Consultee on planning matters relating to all Registered Parks &amp; Gardens.</p> <p>The application is for two new detached dwellings within the Registered Park &amp; Garden Area of the Grade II Chetwynd Park, Telford &amp; Wrekin and adjacent to the Grade II Chetwynd Lodge, which is a Listed Building (see attached plan).</p> <p>The National Planning Policy Framework requires that for proposals which will affect the fabric or Setting of a Heritage Asset, such as Chetwynd Park or Chetwynd Lodge, an appropriate Heritage Impact Assessment (HIA) should be submitted, which will describe the impact on these Heritage Assets of the proposed development. No such document is included with the current application.</p> <p>Please will you request of the applicant that such a study be undertaken, as required by the legislation? I would be grateful also if you could confirm that such a request has been passed on to the applicant and let us know when this has been completed.</p> <p>Once we have an HIA, we will be able to comment on the proposed development. Clearly, it will not be possible in its absence, properly to determine the application, so we ask that the planning process be paused until it is made available.</p> <p>If you wish to discuss this matter, please do contact me at the address below.</p> <p>Yours sincerely, Christopher Gallagher Vice Chair, Shropshire Parks &amp; Gardens Trust</p>
Ludstone Hall	Shropshire	E18/1414	II	<p>PLANNING APPLICATION Change of use of area of open woodland to allow for the siting of 11No.</p>	<p><b>CGT WRITTEN RESPONSE 28.01.2019</b></p> <p>FAO: Emma Bailey, Planning Officer</p>

				<p>log cabins for holiday let use; formation of vehicular access; car parking area and pathways and installation of septic tank. Proposed Development Of Holiday Cabins South Of Ludstone Hall, Ludstone, Claverley, Shropshire. HOLIDAY ACCOMMODATION</p>	<p>Shropshire Council, South-Bridgnorth Team Canern Brook Offices, Stanley Lane, Bridgnorth, Shropshire WV16 4SF January 28th 2019 Dear Emma Bailey, Re: 19/00014/FUL   Change of Use of woodland area to allow for the siting of 11No. log cabins for holiday use, formation of vehicular access, car parking area and pathways and installation of septic tank.   Ludstone Hall Ludstone Claverley Wolverhampton Shropshire WV5 7DE. Thank you for notifying us of the above proposal, which was forwarded also from the offices of The Gardens Trust (formerly The Garden History Society) on 11th January 2019. The Gardens Trust is a Statutory Consultee in planning matters relating to historic parks and gardens which are included on the Historic England Register of Parks &amp; Gardens of Special Historic Interest in England and we are acting on its behalf in this matter. We strongly object to this proposal. The proposed development The major part of the proposed development lies within the parkland boundary of the Grade II Registered Ludstone Hall. Within this boundary, the larger part of the proposed development (6 No. 'Log Cabins') is located within an area of mature woodland within the Registered Park Boundary, known as Birch Coppice, with a second smaller part (3 No. 'Log Cabins') in another area of woodland to the south and east called Danford Coppice. A third part of the proposed development (2 No. 'Log Cabins') lies further to the west at the northern edge of the Danford Brook valley, but outside the boundary of the Registered Park. A proposed new visitor car park allowing for 11 car parking spaces, will be located immediately to the west of Birch Coppice, just outside the boundary of the Registered Park, in an area that will be clearly visible from the adjacent woodland and hence from within the Registered Park and Garden of which it is an important design element. Both of the woodland areas described above are integral elements in the design of Ludstone Hall park. Birch Coppice is visible from the public footpath at the western boundary of the park, and is clearly a well-established area of woodland, dating most likely from the later-18th to early-19th century; hence predating the stated age of the park itself. We were unable to view Danford Coppice. A number of trees of apparently</p>
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					<p>similar age to those in Birch Coppice were also observed in the park itself, and it is clear that these survive from, or were planted on, field boundaries shown on the 1839 Tithe Map, and confirmed by later Ordnance Survey (OS) plans (see Ludstone Heritage Impact Assessment (HIA) Figures 3-5). Thus, while the formal establishment of Ludstone Hall park may indeed be as given in the HIA, i.e. ‘...established from the 1870’s...’(p.13), it is clear that substantial parts of its surviving fabric, including woodland, many of its parkland trees and the northernmost of its two pools, are substantially older than this.</p> <p>The siting of the proposed ‘Log Cabins’ within Birch Coppice and Danford Coppice The proposed ‘Log Cabins’ (11 No. in total) are of a pre-fabricated design from British Log Cabins company. On its website (<a href="http://britishlogcabins.com/">http://britishlogcabins.com/</a>), the company describes the designs (‘The Nook’) in some detail, stressing that because of their prefabricated design, they ‘conform to the Caravan Act and can be delivered fully finished on a chassis and classed as a mobile home’.</p> <p>This gives rise to a concern that the installation of such structures at Ludstone may, by providing a precedent, give rise in the future to further applications for additional mobile homes.</p> <p>Each half of the buildings are stated to weigh 10 tons and these are normally delivered on a lorry, as illustrated on the BLC website: Note however, that the above weight applies only to the smaller of the two proposed designs for Ludstone. No comparable weight is given for the larger design.</p> <p>The ‘Amended Site Location Plan’ (C135/01A) shows that of the proposed 11 cabins to be installed at Ludstone, only 3 appear to be of this smaller size, with the other 8 shown as larger sizes. This plan also indicates that of the 9 proposed cabins within Birch Coppice and Danford Coppice, 7 are sited to overlook the adjacent parkland. This is largely as confirmed by the ‘Supporting Statement’, which states that ‘...the position of these is such that six will have an outlook across to the parkland and pastureland to the east...’ (para.4.3.1).</p> <p>The applicant’s Heritage Impact Assessment (HIA) and the Setting of Ludstone Hall &amp; Park It is clear from the above that if the cabins themselves are to ‘..have an outlook across to the parkland...’, then the reverse view is also inevitable. This however is directly contradicted by the Heritage Impact Assessment, which states that ‘...there will...be no appreciation of their existence outwith the woodland and they will have no</p>
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					<p>impact on the visual amenity, character, or significance of the parkland...' (HIA, Section 7.1.2).</p> <p>The HIA continues: '...the only part of the designated area that will be impacted by the lodges is the woodland itself, but it should be remembered that both Birch Coppice and Danford Coppice predated the creation of the park and although they became elements within it, their intrinsic character had already been established and has not really changed...' (ibid).</p> <p>It is difficult to follow the logic of this statement, although we agree that the woodland will indeed itself be substantially impacted by the proposed 'lodges' and more importantly, by their associated infrastructure.</p> <p>Following the above however, the HIA further states that the woodland areas '...still consist of semimanaged broad-leafed woodland and their sole role within the parkscape was as defining boundaries to the open areas and vistas...' (ibid).</p> <p>Again, if the woodland defines the boundary of the open parkland and of vistas across it, then they must be visible from it. Anything sited within the woodland and looking into the parkland, must therefore be visible from the adjacent park.</p> <p>Notwithstanding all the above, the HIA finally concludes that '...it is considered that the creation of lodges in these woods is an appropriate development and one that will cause no harm in heritage terms...' (ibid).</p> <p>This statement is clearly incorrect in its own terms and is also contradicted by statements in other application documents.</p> <p>The HIA is also incorrect in stating that '...the proposed lodges will cause no harm to the character, setting, or significance of Ludstone Hall, its lodges, gateways, outbuildings and gardens...' (para.7.2.2).</p> <p>A photograph within the HIA (Plate 1) showing Ludstone Hall from the south, is clearly taken from within the area of the Registered Park (see Appendix A). Plate 2 similarly shows the 'View south from in front of the gates of Ludstone Hall' and depicts the parkland as visible from this point, including the east side of Birch Coppice, with Danford Coppice also visible in the distance. Parkland trees are also visible on the left of the picture, to the south and east of the ponds.</p> <p>It is obvious from these two images that an observer within the park will be able to see both the proposed 'log cabins' within the adjacent woodlands, as well as Ludstone Hall. The Setting of '...Ludstone Hall, its lodges, gateways, outbuildings and gardens...' , as well as that of its parkland, will</p>
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					<p>thus be compromised by the proposed development, and the Significance of both heritage assets will be damaged in consequence.</p> <p>It is worth noting here that the National Planning Policy Framework (NPPF), as quoted in the HIA, defines Setting as ‘...the surroundings in which a heritage asset is experienced...’ (HIA para.3.2, p.6). Clearly, for an observer within the park who is able to see both Ludstone Hall and its surroundings as described above, as well as the proposed development within Birch Coppice and/or Danford Coppice, then the experience and hence the Setting of Ludstone Hall &amp;c. will be compromised.</p> <p>It might be argued that, as Ludstone Hall park itself is not open to the public, then the above argument carries no weight or is irrelevant. Significantly however, the HIA also quotes the NPPF in confirming that ‘...The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting...’ (HIA para.3.2, p.7, our emphasis).</p> <p>Even if this were not the case, the amended application plan shows an access footpath across the historic parkland, serving the fishing lakes, from which both Ludstone Hall, the historic parkland and the proposed cabins would all be visible at the same time.</p> <p>The proposed development would therefore damage the Significance not only of the Registered Park and Garden of Ludstone Hall, but also by damaging their Setting, of Ludstone Hall, its lodges, gateways, outbuildings and gardens as well.</p> <p>Gaps, inconsistencies &amp; errors within and between the application documents</p> <p>As indicated above, a number of inconsistencies are apparent also between statements made in the different application documents, with significant gaps also in the information provided.</p> <p>1). The Supporting Statement for example asserts that ‘...little in the way of groundworks will be required. It is proposed that the cabins will be supported by stilts to ensure the surrounding woodland is not impacted by concrete bases or heavy machinery required for excavation...’.</p> <p>The British Log Cabins website on the other hand clearly recommends that the ‘Nook’ cabins be supported on a concrete slab.</p> <p>Given the substantial weight of even the smaller of the two cabin designs (20 tons) it is difficult to see how this can or will be supported on ‘stilts’ in a woodland area on a sandy soil, without excavation, and no detail is given of these implied structural elements.</p>
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					<p>2). The Application Form states that Foul Sewage will be disposed of via a Package Treatment Plant, with the Supporting Statement confirming that ‘...foul water drainage is suggested to be a dedicated sewage treatment plant sited at the joining of Birch Coppice and Danford Coppice as shown in Figure 5...’ (para.4.9.3), although no details of this system is given. Instead, it is suggested that the applicant will ‘...liaise with Shropshire Council drainage department to aid with the design of the foul water drainage system...’ (para.4.9.4).</p> <p>Given the scale of this proposed development, the absence of information on this aspect is worrying, to say the least. Even if the proposed cabins are installed as described above, the excavations required to supply them with water, electricity and the appropriate removal of foul sewage to the proposed ‘treatment plant’ are likely to be the most damaging and disruptive aspect of the project, altering the local water table within the woodland and causing significant damage to tree roots.</p> <p>As has been pointed out in the Heritage Impact Assessment (p.22), there are no historic trackways through these woodland areas, which might be used as the route for these excavations. The track along the west side of Birch Coppice is not shown on any historic plans and is reportedly a recent development. It will thus be underpinned by a network of tree roots which will undoubtedly be damaged by excavations along it, which will be to the detriment of adjacent trees.</p> <p>Access by heavy machinery, including delivery wagons and the cranes that will be necessary to offload the cabin ‘halves’ to site, will similarly cause soil compaction to these areas, damaging tree roots and altering the woodland water table, to the detriment of adjacent trees.</p> <p>3). The Supporting Statement asserts that ‘...the Heritage Impact Assessment found that there will be no negative visual impact resulting from the log cabin [sic] on the adjacent [my emphasis] heritage site...’ (para.4.11.3).</p> <p>While this statement is clearly incorrect, as has been outlined above, it appears also to suggest the applicant does not understand that the majority of the development site lies within the ‘heritage site’ itself (i.e. the Grade II Registered Park and Garden, see Appendix A below).</p> <p>In addition, the proposed visitor car park will be sited immediately adjacent to the Grade II Registered Park and Garden itself, and will thus necessarily damage its Setting. The HIA however dismisses this impact as ‘...negligible...’ (para.7.1.2), an assessment which is wholly inadequate,</p>
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					<p>given the scale of the proposed development.</p> <p>Summary It is our view that the proposed development within the park at Ludstone Hall will cause harm to its Significance, by:</p> <ul style="list-style-type: none"> <li>• damaging the fabric of its Grade II Registered Park and Garden;</li> <li>• damaging the Setting of the Grade II Registered Park and Garden;</li> <li>• similarly, damaging the Setting of the Grade I Listed Ludstone Hall, its Grade II Listed Lodge, its Grade II Listed Gardens Walls, Gate Piers &amp; Gates &amp; its Scheduled Moated Site and Fishpond;</li> <li>• causing significant and irreparable damage to woodlands within the park, specifically to Birch Coppice and Danford Coppice.</li> </ul> <p>This harm we judge to be Less than Substantial, although we believe it to be highly Significant.</p> <p>Yours sincerely, Christopher Gallagher Vice Chair SPGT for Shropshire Parks &amp; Gardens Trust &amp; The Gardens Trust</p>
Keele Hall	Stafford shire	E18/1485	II	<p>PLANNING APPLICATION</p> <p>Development of solar array and energy storage facility. Land adjacent to Springpool Wood, South of Phase 3 and west of Newcastle Golf Club, Keele University, Keele. SOLAR</p>	<p><b>CGT WRITTEN RESPONSE 21.01.2019</b></p> <p>Thank you for your consultation of 3 January. I am replying on behalf of The Gardens Trust and Staffordshire Gardens and Parks Trust in accordance with working arrangement agreed between the two organisations.</p> <p>The application site lies at the south eastern end of the historic park at Keele Hall. The greater part of the site is included within the grade II registered park and garden at Keele: a small area comprising the entrance track lies just outside the RPG but immediately abuts it. The application site is close to the boundary of the designated Keele conservation area: it also lies within the North Staffordshire Green Belt.</p> <p>The historic park at Keele appears to have been laid out after 1769 to the designs of William Emes, a foremost landscape designer of the period and near contemporary of Lancelot (Capability) Brown whose style he closely paralleled. A principal element of the landscape was the formation of a lake to the east of the hall linking to a series of cascades and pools running south eastwards down the valley towards Springpool Wood. Emes created a pathway down the dingle and around the pools. His work was developed from 1829 by W.S. Gilpin who reinforced the planting in this area and was probably responsible for the surviving perimeter belt of yews separating the circular path from the adjacent wood pasture shown on an 1878 OS map to the east.</p> <p>The application site lies just beyond the wooded dingle within the area of wood pasture. It comprises open undulating, primarily south facing</p>

					<p>farmland, broken by the long established spinneys of Pie Rough and Brickkiln Plantation. Although modern agricultural practice has removed the scattered tree cover of the wood pasture (a few field trees still survive beyond the application site to the south) it still possible to appreciate the significance of this rolling landscape as the foreground of historic views towards the wooded edge of the core pleasure grounds particularly when seen from the historic drive along Lymes Avenue, from the Whitmore Road, from Park Lane, Butterton, or in more distant views such as that from North Wood at Trentham. The site is clearly part of the designed landscape at Keele and is properly included in the RPG.</p> <p>Registered Parks and Gardens are a finite and limited heritage resource of which there are only 1600 in England. Historic England criteria for selection of sites on to the RPG indicates they “must hold a level of significance defined as ‘special historic’ interest in a national context” and be capable of satisfying nine general criteria five relating to date and rarity, four to degree of preservation, associational interest or design significance. RPGs are therefore of particular national significance and worthy of effort to secure their proper preservation. Paragraph 194(a) of the NPPF advises that any harm to, or loss of the significance of a designated heritage asset from its alteration or from development within its setting should require clear or convincing justification. Substantial harm to grade II registered parks or gardens should be exceptional.</p> <p>The Gardens Trust and Staffordshire Gardens and Parks Trust object strongly to . the current proposal to erect a solar array and ancillary development within the RPG at Keele. The adverse impact of the development will be exacerbated by the related proposals for co-siting two wind turbines within the site boundary. The Trusts consider that locating development of this type within an RPG is in principle unacceptable being contrary to both the historic character and purpose of the site and to the spirit of the legislation promoting its protection. More specifically the solar array with its extensive range of utilitarian frames and reflective south facing panels within Keele RPG will detract from foreground views of the park and an appreciation of its context in the wider landscape (see for example viewpoints 6 from Park Lane, Butterton) . Contrary to statements in the Heritage Chapter of the EIA the development will be visible from the historic perimeter walks around the lake and cascade of pools. The industrial nature of the support stands and pv panels will be wholly at variance with their rural setting; the reflective face of the panels will be</p>
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					<p>visually distracting in a landscape intended historically to offer peace and repose. The Heritage Statement is wrong to claim that proximity to the North Staffordshire conurbation and the M6 motorway diminish the context of the park: it clearly retains the characteristics of a sylvan oasis. While the merit and public benefit of proposals to reduce the applicants' energy usage and carbon footprint are appreciated they have not demonstrated that their proposals are the only way of achieving those goals or that this is the only realistic site to locate them. While the currently proposed equipment may have only a projected 25 year working life the applicants have not offered any guarantee the use of the site would not continue beyond that time to justify their claim the impact of the development would only be temporary. In short they have not demonstrated their proposals are so exceptional as to warrant the substantial harm that would be caused to the two heritage assets – namely Keele conservation area and Keele RPG. In the circumstances the Trusts recommend that this application and the related proposals for a wind turbines on the site be refused planning permission.</p> <p>The applicants suggest (EIA Heritage Chapter; EIA Summary; Planning Statement) that the development would offer an opportunity to reinstate wood pasture planting around the site but have included no landscape proposals to that effect. In the event that your Council is minded to grant permission for the development(s) it is suggested the developers be required by enforceable condition not only to undertake replanting of this area but also to fund a conservation plan for the wider park as well as a programme of management and enhancement works in the dingle immediately adjoining the application site.</p> <p>Yours sincerely, Alan Taylor Chairman</p>
Great Barr Hall	West Midlands	E18/1048	II	<p>PLANNING APPLICATION Replacement Dwelling. 12, SKIP LANE, WALSALL WS5 3LL. DEMOLITION, RESIDENTIAL</p>	<p><b>TGT WRITTEN RESPONSE 04.01.2019</b></p> <p>Subsequent to my letter of 21st November 2018, additional correspondence has been submitted from Elli Winterburn, an Historic Buildings specialist from Jacobs consultants to 'concentrate on the wider, potential setting impacts of these proposals' on the above application. I am concerned that her final paragraph appears to be inaccurate and as your officers will be relying on such advice I am anxious to query whether it is correct. She states 'The proposed new building is not going to be taller than the existing building...' The existing roof is 7.1m tall and the</p>

					<p>replacement building roof height is 9.75m tall, 2.65m taller than the existing building so there would appear to be a significant discrepancy. As it is, 12 Skip Lane is already in full view of Walsall Lodge (or Merrion's Lodge) and we would therefore like to reiterate the comments in our previous letter regarding the possible precedent and deleterious effect the new building would have on the setting and significance of Gt Barr. We would also like to query whether we are correct in assuming that the large specimen oak in the front garden of the property is covered by a TPO? In that case we would expect to see an arboricultural report detailing how the root zone is to be protected.</p> <p>We maintain our objection to this application for all the reasons outlined above and in our previous letter.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p> <p><b>TGT WRITTEN RESPONSE 28.01.2019</b></p> <p>Thank you for getting back to me in response to my letter of 4th January regarding the above application. I am glad to hear that the oak tree in the front garden has a TPO on it and that should the application be permitted, that appropriate protection measures would be secured in accordance with BS 5837 : 20102.</p> <p>We have no further comments to make and maintain our objection as per our earlier correspondence.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Heath Hall	West Yorkshire	E18/1328	N	<p>PLANNING APPLICATION Repair and minor alteration of a grade II listed dwelling and improved vehicular access. Sycamore House, Heath, Wakefield.</p> <p>BUILDING ALTERATION</p>	<p><b>CGT WRITTEN RESPONSE 07.01.2019</b></p> <p>Thank you for consulting The Gardens Trust. The Gardens Trust (GT) is the statutory consultee regarding proposed development affecting a site on the Register. The Yorkshire Gardens Trust (YGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.</p> <p>Sycamore House is a grade II listed building and situated in the historic village of Heath; a conservation area. The gardens and landscape are not on the Register of historic parks and gardens. We have no objection to the proposed reinstatement of a horseshoe-shaped drive in front of the house</p>



					as shown on an early 20th Century OS map. Yours sincerely, Val Hepworth Chairman Cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust
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