



## CONSERVATION CASEWORK LOG NOTES FEBRUARY 2019

The GT conservation team received 162 new cases in England during February, 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, 52 'No Comment' responses were lodged by the GT and 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
Ashton Court	Avon	E18/1597	II*	PLANNING APPLICATION New path for the shared use of walkers and cyclists providing the Missing Link in the Festival Way Cycle route from Bristol to Nailsea. Kennel Lodge Road, Bristol BS3 2JT. FOOTPATH/CYCLEWAY	<p><b>CGT WRITTEN RESPONSE 25.02.2019</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 Ashton Court Estate encompasses a Grade I, C15 and later, house set within the Grade II* Registered Park and Garden laid out after designs by Humphry Repton and formal gardens [late C19] around the Grade I house. Relevant to these proposals are the house, and also the gardens situated at an elevated position, south and south-east of the house which are part of the view looking from the house towards the proposed new cycle pathway. At the time of the 2015 consultation, we made site visits and walked the then proposed route of the cycle path / pedestrian pathway. We note, that in the heritage assessment statement our observations at the time that the proposed route at point 'D' to 'E', [the woodland strip] would be too</p>

					<p>intrusive upon the listed landscape of the Historic Estate. We welcome the new proposals which have addressed this issue.</p> <p>Avon Gardens Trust accept that strategically planted trees on the mansion side of the 'woodland strip' should reduce the harm to the views from the elevated position of the house.</p> <p>The 'Future long view of the [newly restored] Gatehouse' would be very welcome if it were not for the view currently being blocked by the intervening school buildings. Therefore trees in the woodland strip should not be felled to open this view.</p> <p>Security and lighting in the context of this 24hr. woodland cycle route is also a concern. Will the solar studs be effective under the tree canopy or at night?</p> <p>Avon Gardens Trust appreciate that filling in the 'missing link' in the Festival Way Cycle Route would be popular, but is it essential?</p> <p>Summary: The Avon Gardens Trust objects to this proposal unless the Woodland Management plan is approved by Historic England.</p> <p>Yours sincerely, Ros Delany (Dr) Chairman, Avon Gardens Trust</p>
Reading Cemetery (Palmer Park)	Berkshire	E18/1298	II	LOCAL PLAN Draft Palmer Park Development Framework consultation	<p><b>CGT WRITTEN RESPONSE 19.02.2019</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting sites listed by Historic England (HE) on their Register of Parks and Gardens. In this case Palmers Park is of local historic interest and forms the setting of the Grade II listed statue of George Palmer. The Berkshire Gardens Trust (BGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of historic sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations within Berkshire.</p> <p>One of the key activities of the Berkshire Gardens Trust (BGT) is to help conserve, protect and enhance designed landscapes within Berkshire. Although Palmers Park is not on Historic England's Register of Historic Parks and Gardens, it is an important part of the history of Reading's parks and the richness of Reading's history in particular the urban environment of East Reading. It is also important for its connections with the Palmer family, and in particular George Palmer whose Grade II listed statue is a focal point of the park. We are therefore grateful for the opportunity to comment on the Development Framework.</p>

					<p>BGT welcomes recognition of the historic context in the Development Framework and that the Park substantially retains its historic landscape structure. However reference to historic features is limited to consideration under the title 'Circulation' rather than being considered in the wider sense in accordance with the emerging Local Plan's policies on heritage, which BGT have fully supported, and in particular Policy EN1 which says, inter alia:</p> <p>All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.</p> <p>Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement. Consequently we feel that in this case it is important that the Development Framework should be accompanied by a Heritage Statement which covers fully the various heritage aspects of the Park: the George Palmer statue; the tree avenues; its historic circulation routes; its park buildings; its key lines of sight and focal points; its openness; and its late Victorian/early 20th century setting of terraced houses. The Development Framework should then be used to both protect and enhance the historic character and local distinctiveness of the Park.</p> <p>In principle BGT supports the location of a new pool at Palmers Park, as this would be in keeping with its historic purpose. The following comments are therefore made bearing in mind our hope and belief that this project provides a good opportunity to enhance and restore the surviving historic features as part of an upgrade of the whole park.</p> <p>George Palmer statue; The setting of the Grade II statue was originally open parkland next to the Stadium/Velodrome. Over time this has been compromised with the introduction of the surrounding tarmac; parking; poor fencing around the Stadium/Velodrome and maintenance building; and the maintenance building itself. The alignment with the historic approaches to the statue from the north and south has been lost. The development provides a good opportunity to enhance and restore the setting which in our view has not been realised in the proposed layouts. We support the creation of a central open public pedestrian 'Heart Space' but we feel that the statue should form an integral part and focal point of</p>
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					<p>this space which ideally should be free of vehicles. Similarly, retention of the exiting unattractive maintenance area would in our view compromise the quality of the Heart Space and any associated improvements to the setting of the statue.</p> <p>Tree avenues: We are pleased to see that the surviving tree avenues will be retained and look forward to the framework including a programme of ongoing maintenance for the long term health of these trees and the avenues. We think that the development provides an ideal opportunity to replace the line of trees that were originally planted behind the Victorian pavilion to recreate the historic continuous avenue. A photograph from the 1890's also shows new planting along the original principle access off Wokingham Road to the pavilion. This too could be replanted. The development also provides an opportunity to restore the continuity of the historic line of trees along Wokingham Road. We feel that it is important that the trees are of the same stature as the surviving tree avenue species and that small or medium sized tree species are not used as these would not have the same impact or be in keeping with the local character.</p> <p>Historic circulation routes: We support the proposed restoration and retention of the historic circulation routes which provides an opportunity to enhance and restore the Park fully in keeping with the Key Design Drivers which are mentioned in the Framework. The original historic alignment of the main access off Wokingham Road which led to the junction of St Bartholomew's Road and Wokingham Road has been altered over time and disabled parking added. Whilst we appreciate the need for this parking, the area has deteriorated into a poorly maintained area with the loss of key views. Similarly BGT feels that the Framework's proposals to retain the parking and the loss of the original direct view to the pavilion as a feature of the park detracts from the historic significance of the park and its relationship to Wokingham Road. We would therefore support the provision of just one vehicular access as at present with the other routes in the park enhanced for pedestrian and cycle use only. We also note that the pedestrian paths in the southern part of the park would not lead into the 'Heart Space' but to the northern end of the proposed parking. This seems a poor design solution, given the aspirations for the Park.</p> <p>Park buildings: It is a pleasure to see that the Victorian pavilion and smaller building (originally a urinal?) have survived and are still linked by the tree avenue. We support the retention of these buildings and the proposed enhancement of their settings. The fencing to the play area at the moment</p>
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					<p>detracts from these buildings and the park landscape, so we hope that this project will be seen as a good opportunity to undertake a major improvement play area as whole. The existing modern Stadium/Velodrome building sits roughly on the location of the original Victorian building to the east of the north-south alignment across the park. We therefore prefer Option 1 which shows the new pool on this alignment and avoids intrusion into the 'Heart Space' and the setting of the statue. However we are concerned that the maintenance building and its hard standing and fencing significantly detract from the park and would also detract from the new pool development. We therefore suggest that alternative locations for the maintenance facilities be sought elsewhere where the impact on the core of the recreational facilities and the park can be minimised and vehicular access across the 'Heart Space' removed or limited. Finally, we note that the existing velodrome is enclosed by very ugly fencing and intermittent planting. These significantly detract from the park and should be redesigned to contribute to the quality of the park experience.</p> <p>Key lines of sight and focal points: In considering the circulation routes and placing of new facilities, we suggest that the key lines of site to focal points be developed further to restore the original historic design and to enhance the park experience overall. In addition to our comments on the statue and the pavilion above, the existing gate entrance piers, views to the tree avenues, new views to the proposed pool are all important and should be covered in the Core Design Principles. The Development should ensure that it delivers these principles.</p> <p>Late Victorian/early 20th century setting of terraced houses: Although outside of the park, these late Victorian and early 20th century houses are very visible from the park, especially in the winter months, and make a positive contribution to conserving the Victorian character of the park and quality of the surrounding area. Retention and enhancement of these views to the north, west and south of the recreational core is important.</p> <p>Openness: The park is distinguished by the openness of the park to the north and south of the stadium, in keeping with its historic design. This allows long views to the tree avenues but also to the houses around the park. We support those aspects of the proposed development that achieve this, but we have major concerns about the extension of parking right across the southern parkland as far as Palmer Park Avenue. This would result in the loss of the characteristic openness of the park, the loss of views to the terrace of houses and to the tree avenues. We appreciate that</p>
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					<p>the demand for parking will increase and that the present arrangement is unsightly, but feel that the location of the parking should be revisited to avoid harm to the park as a whole. For example in Figure 11 the northern part of the proposed overflow parking (5) and part of area 7 could be redesigned for permanent parking whilst the overflow parking on reinforced grass could be accommodated north of Palmer Park Avenue. The propose wildlife area at Figure 11 area 7 would also sit well with an open parkland setting in the south of the park.</p> <p>In conclusion, BGT hopes that the Council will be minded to consider in more depth the historic factors associated with the park, so that the proposal to introduce a new pool and enhance the existing facilities within this historic park can be achieved with enhancements to, and minimum impact on, the Victorian framework of this important designed landscape.</p> <p>Yours sincerely, Bettina Kirkham, BGT Planning Advisor.</p>
Wotton House	Buckinghamshire	E18/1376	II*	<p>PLANNING APPLICATION</p> <p>Installation of 22.50m high swann engineering column. Land At Wotton End, Kingswood Lane, Wotton Underwood, Buckinghamshire HP18 9RB.</p> <p>MISCELLANEOUS</p>	<p><b>TGT WRITTEN RESPONSE 15.02.2019</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 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 and would be grateful if you could take our comments into consideration when deciding this application. Please accept our apologies for the delay in responding.</p> <p>We have studied the online documentation and the applicant clearly accepts that there will be an impact on the setting of the RPG at Wotton and admits as much in their D&amp;A statement (6.4.2) : 'There is, therefore, potential for the Proposed Development to form a slight distraction in this designed view. However, as discussed, the presence of the Proposed Development would not be located directly along the key sight line formed by the avenue and as such it would not constitute a material change to its setting such that the significance of the asset and the ability to appreciate that significance will be materially diminished.' The GT/BGT feel that it is unacceptable to argue that the mast is not in the 'key' sight line but only to the north of the western avenue. That assumes that people only ever look in one direction and not panoramically.</p> <p>We maintain our objection as stated in our response (18/02015/ATN) of 28th July 2018. We would ask that an alternative site is found which does not impact on any RPGs in this area. We note that your Heritage Officer</p>

					and Historic England have both objected for the same reasons. Yours sincerely, Margie Hoffnung Conservation Officer
Langley Park	Buckinghamshire	E18/1605	II	PLANNING APPLICATION Erection of a covered boathouse to provide ancillary hotel facilities. Langley Park House, Uxbridge Road, George Green, Wexham, Buckinghamshire SL3 6DW. MISCELLANEOUS	<p><b>TGT WRITTEN RESPONSE 26.02.2019</b></p> <p>Thank you for consulting The Gardens Trust (GT) about the above application. When looking at the documents for this online it became apparent that there are numerous other applications for this Grade II registered park and garden (RPG). I am attaching a list of those you have consulted us about over the past 17 years or so and it is clear that there are quite a few more which seem to have fallen through the net. It is very regrettable that your authority failed to notify us of these in our role as Statutory Consultee with regard to proposed development affecting all grades of site included by Historic England (HE) on their Register of Parks &amp; Gardens. It is possible that somewhere within the documentation for one of these there is a Heritage Statement or a Heritage Impact Assessment for all the cumulative changes the applicant is proposing, but the omission of one makes it very hard to form a clear idea of how these applications will affect this important Capability Brown parkland and designed historic landscape. We will urgently be reviewing the documentation for those not yet decided so would appreciate it if under the circumstances, you could give us a time extension to respond and just clarify to us which applications are still outstanding so that we do not miss any. With regard to the above application we have liaised with our colleagues in the Buckinghamshire Gardens Trust and would be grateful if you could take our comments into consideration when deciding this application.</p> <p>The Parish Council are awaiting leasehold documentation with regard to this application, so until this is forthcoming it seems unlikely that any decision can be made with regard to the proposed boathouse. We cannot see any mention of a Victorian boathouse in the original listing for the property; it had clearly been demolished, but it is disappointing that there is no mention of it especially when there is evidence on the ground of its previous existence. The GT/BGT has been unable to find any image of the original boathouse in either the application or in a quick internet search, so again we are unable at this stage to comment on whether the new design is appropriate. Many traditional Buckinghamshire boathouses (such as those along the Thames) are enclosed and more ornate with barge boards and extensive timber-framing. Many are two storey with a room above.</p>

					<p>This would all be inappropriate in this position and the suggested opened sided image shown as precedent would be more suitable.</p> <p>We also note that access is proposed via existing paths from the main house which will be reinforced for disability access. However, we cannot see any mention of the proposed materials and we would appreciate some clarification on this.</p> <p>We are happy that the application proposes to reinstate a boathouse in its previous position as it will improve this particular area of the lakeside. We would ask that the design be lightweight and open and to see an image of the previous boathouse if one exists. We are also glad to note that Colvin and Moggridge are involved in the landscaping.</p> <p>Given these parameters, the GT/BGT makes no objection to the application.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Doddington Hall	Cheshire	E18/1594	II	<p>PLANNING APPLICATION</p> <p>Variation of conditions on full planning application 14/5654N. Doddington Hall, LONDON ROAD, DODDINGTON CW5 7HN.</p> <p>MISCELLANEOUS</p>	<p><b>CGT WRITTEN RESPONSE 09.02.2019</b></p> <p>We appreciate the approach to phasing proposed work in order to secure vulnerable heritage assets. The application for variation of conditions includes condition 14 –</p> <p>14. Notwithstanding the detail shown on the approved plans a revised hard and soft landscape scheme including a detailed planting plan and method statement for the proposed woodland creation and parkland restoration and details of materials for hard surfacing, retaining walls and other structures shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development. The landscaping scheme shall be informed by a full Historical Assessment of the historic park and garden, detailing, inter alia, the involvement of Capability Brown in the original design, layout and construction, by a suitably qualified expert. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the completion of external construction works.</p> <p>Reason: To ensure appropriate landscaping of the site having regard to Section 197 of the Town and Country Planning Act 1990 and in accordance with Policy BE.2 (Design Standards) of the Borough of Crewe and Nantwich Replacement Local Plan 2011.</p> <p>However the statement in the applicant's covering letter 19.11.2018 suggests no change to the delivery of condition 14:</p>



					<p>LBC 14/5656N : The development and/or works to which this consents relates shall commence within three years of the date of this consent, with the first phase being the implementation of works to Delves Tower and thereafter Phase 2 involving the discharge of all other conditions as originally intended.</p> <p>Please would you clarify and confirm that condition 14 is to be met in full as part of Phase 2 and prior to the commencement of the proposed landscaping scheme?</p> <p>Kind regards, Barbara Moth The Cheshire Gardens Trust</p>
Tatton Park	Cheshire	E18/1676	II*	<p>PLANNING APPLICATION (1) Discharge of Condition 4, LBC Condition 7 Partial Discharge (not inclusive of central stableyard landscaping), (2) Condition 6 (Partial), (3) Condition 7 and LBC Condition 4 Partial on Approved Planning Applications 18/1276M and 18/1277M. Tatton Park, Mereheath Drive, Knutsford WA16 6QN (MISCELLANEOUS)</p>	<p><b>CGT WRITTEN RESPONSE 27.02.2019</b></p> <p>Thank you for providing the additional drawings and information related to Discharge of Conditions. On the basis of this information The Cheshire Gardens Trust, responding on behalf of The Gardens Trust, does not wish to make any further comments.</p> <p>We would wish to be consulted of any material changes to these proposals should they occur. Additionally, the Trust would be willing to provide any detailed advice related to our original comments 4 April 2018.</p>
Boreham House	Essex	E18/1525	II	<p>PLANNING APPLICATION Erection of office village with associated parking, servicing and landscaping. (Appearance, landscaping, layout &amp; scale reserved). Land East Of Premier Lodge Hotel, Main Road, Boreham, Chelmsford, Essex. OFFICE/COMMERCIAL</p>	<p><b>CGT WRITTEN RESPONSE 13.02.2019</b></p> <p>I am commenting for the Essex Gardens Trust representing The Gardens Trust, the statutory consultee for applications concerning registered parks and gardens. This application is within the setting of the grade I listed Boreham House and its grade II registered landscape. It is a revised version of application 17/00410/OUT which was withdrawn. My comments on that application were as follows:</p> <p>‘South-east of the development site, on the other side of Main Road, the neo-classical Boreham House stands at the end of a wide linear canal. It was built 1726-33 by Benjamin Hoare on land belonging to New Hall which he had purchased. The House has not just the canal to the north, but also a landscape to the south created by Richard Woods at the end of the 18th century.</p> <p>‘Needless to say, the setting of the House and its landscape have changed, as the Heritage Statement accompanying this application says. Modern arable farming, roads, housing and commercial development have all</p>

					<p>altered it. Nevertheless, it remains a conspicuous landmark, familiar to all local residents, and immediately apparent to passing motorists, never mind walkers or cyclists, as somewhere very unusual and special, and of striking beauty. It is not necessary to understand anything of its history to appreciate its impressive landscape qualities.</p> <p>‘This application is more sensitively designed than a previous one which was refused. The office village would be screened by planting on Main Road. However, the development of the application site with buildings would lead to additional loss of what survives of the rural context of Boreham House, and hence further incremental damage to its setting, which is defined in the NPPF as the surroundings in which heritage assets are experienced. Boreham House and its setting should also be seen as part of the amenity of local residents and those who live in the new housing which has been developed nearby. Development of the application site would also lead to pressure on the small blocks of land left between it and The Generals and Paynes Lane.’</p> <p>These observations remain relevant as the new application is essentially the same as the 2017 one, except that the footprint is slightly smaller and the number of office buildings accordingly reduced. The development would only add to the ongoing loss of the setting of the listed Generals and Boreham House with its landscape, never mind the wider erosion to the countryside around New Hall. In addition, the proposed design of the office units would create an improbable collection of faux barns. Designing new buildings to look like barns is not good architecture, is a specious attempt to ‘respect the wider countryside context of the site’ (HS 4.29), and can confuse the legibility of the historic landscape.</p> <p>Once again I would ask you to bear these considerations in mind when determining this application. Were it to be approved, there should be a condition requiring details of the landscape screening on Main Road which should be to a high standard.</p> <p>Regards David Andrews FSA, IHBC</p>
Hatfield Peverel Neighbourhood Plan	Essex	E18/1601	n/a	<p>NEIGHBOURHOOD PLAN Public consultation</p> <p>The Hatfield Peverel Neighbourhood Plan inc Post Submission Further Changes Neighbourhood Plan - Basic</p>	<p><b>CGT WRITTEN RESPONSE 22.02.2019</b></p> <p>I have looked at the on-line consultation for the Hatfield Peverel neighbourhood plan. Although strong on the natural and historic environment, it overlooks the existence of the registered landscape at Hatfield Priory, and I have pointed this out.</p> <p>David Andrews</p>

				Conditions Statement. Neighbourhood Plan - Strategic Environmental Assessment (SEA) & Habitats Regulation Assessment (HRA)	
Victoria Tower Gardens	Greater London	E18/1437	II	PLANNING APPLICATION 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; reprovision 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) which may be viewed with the application documents). The Victoria Tower Gardens, Millbank, London SW1P 3YB. VISITOR ATTRACTION, EDUCATION	<b>CGT WRITTEN RESPONSE 05.02.2019</b> We write as the Planning & Conservation Working Group of the London Parks & Gardens Trust (LPGT). The LPGT is affiliated to The Gardens Trust (TGT, formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England Register of Parks and Gardens of Special Historic Interest. Inclusion of a site on the HE Register is a material consideration in determining a planning application. The LPGT is the gardens trust for Greater London and makes observations on behalf of TGT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the London Inventory (see <a href="http://www.londongardensonline.org.uk">www.londongardensonline.org.uk</a> ) and/or when included in the Greater London Historic Environment Record (HER). This application proposes to irreversibly change the character of the grade II registered Victoria Tower Gardens, originally created and designed for unrestricted public access and recreation, with the proposals for above and underground buildings (only accessible by prior booking), barriers, memorial and landforms. Summary of key heritage, social and ecological significance Victoria Tower Gardens is a significant historic landscape of national importance in its own right, as well as providing the setting for grade I, II*, and II listed buildings and monuments. The key historic significance of the landscape lies in the following: <ul style="list-style-type: none"> <li>• its creation as a unified garden as a result of the embankment of the Thames in response to pollution of the river</li> <li>• its archaeological potential to reveal more of the area's development as an area at the centre of the country's most historic events</li> <li>• its provision for the use of the public as a philanthropic act to be maintained as a public garden and play space, reflecting the increased understanding of the importance of such provision for all in a densely populated city</li> <li>• its philanthropic development as a playground for local children in the</li> </ul>

					<p>C19 reflecting the contemporary development of recognition of the importance of play, particularly for those with a lack of access to such amenity</p> <ul style="list-style-type: none"> <li>• its simple design aesthetic affording long views to the internationally recognised buildings of the Palace of Westminster, framed by London Plane trees, some of which are the original plantings, and open expanse for recreation</li> <li>• the chosen open setting for monuments to slavery, emancipation and heroism, with the symbolic juxtaposition of Parliament, accessible and open to all</li> <li>• its continued use by the public since its creation for national celebrations and gatherings, including marking royal events.</li> </ul> <p>The Garden's key social and ecological significance lies in the following:</p> <ul style="list-style-type: none"> <li>• its importance as a valued open space for access to nature, recreation and relaxation as refuge from the noise and frenetic activity of the nearby major tourist areas, both for visitors and local residents and workers</li> <li>• its amenity provision in an area with very limited access to open space and nature</li> <li>• its potential as wildlife habitat, providing cover and food in a wildlife corridor in a very heavily urbanised area</li> <li>• its mature tree growth mitigating air pollution and psychological effects of noise, particularly given the characteristics of the London Plane. These significances are recognised by the numerous national historic and landscape designations contained in the Historic England Register of Parks and Gardens and listed buildings.</li> </ul> <p>LPGT's Reasons for Objection LPGT objects to the application for a number of reasons. We do so on the basis that, in accordance with NPPF, many of the Gardens' heritage values, along with the setting of listed and unlisted monuments provided by the Gardens, will be substantially harmed. The proposals are also contrary to WCC's planning policy regarding Conservation areas, green space and historic landscapes. We believe the choice of sites to be fundamentally wrong, and politically rather than policy-led, without reference to normal planning considerations. The following sets out our key objections:</p> <ol style="list-style-type: none"> <li>1. Omissions in the applicant's understanding of the Gardens' Heritage Values and original design intent In accordance with NPPF para 189, the applicant has submitted their understanding of the heritage asset. We find there are serious omissions in the applicant's chronology of the site's</li> </ol>
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					<p>history, and significance statement for the Gardens. This demonstrates a lack of understanding about the design intent for the Gardens, its heritage values (as defined by Historic England) and therefore its significance, as follows:</p> <p>1.1 The applicant's proposal regarding Piecemeal Development :(VOLUME_3_HTVIA_PART15782097, pg 5) states that the Gardens 'developed piecemeal over an extended period, and the Proposed Development provides an opportunity to consider the space therein as a whole'. LPGT response: This statement suggests that the Gardens have never been designed or considered as a 'whole' in the past, which is evidentially incorrect. The Gardens have been laid out to designed plans in two distinct design periods, the latter which still exists today, after an initial concept of a unified, uncluttered lawn, suggested by Charles Barry in 1857. The applicant has omitted to include the 1949 plan (Ministry of Works File Work 16/826) Also contained in Section 4 of LPGT's 'VTG Conservation and Statement of Significance Plan', sent to WCC, with this letter. The existing layout was designed by placing each memorial or sculpture in careful locations (on axis, at the entrance, in the foreground) and opening up the space so each of them relates directly to Parliament and enables free circulation around them. The common theme of both design periods was to enable open views to Parliament and to create a space for use as a garden and recreational play space as well as the setting for each significant structure and long views to Parliament.</p> <p>1.2 The applicant's proposal (VOLUME_3_HTVIA_PART1-5782097, pg 4) states of the Buxton Memorial: 'Its location close to Parliament contributes to its historic interest, though appreciation of the monument's purpose is limited by its placement at the convergence of footpaths, which inadvertently places the memorial as the central feature of a pedestrian traffic island' LPGT response: The 1949 plan (publicly available: Ministry of Works File Work 16/826) shown in our Conservation and Significance Statement, clearly shows that the current scheme was designed carefully to place the Buxton Memorial on axis with the (grade I) church of St John the Evangelist, along Dean Stanley Street, as well as being visible to and from Parliament. The approved Paper laid before Parliament in 1940 states 'The fountain is in the nineteenth century Gothic style which could not successfully be conjoined to the more simple style of the present layout of the [Parliament] Square.... It is desirable however that this memorial of an act outstanding in the annals of Parliament should not be far removed</p>
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					<p>from the scene of Parliament; it should be located at the river end of the footpath, which continues the line of Dean Stanley St. .... Agreed with the Anti-Slavery Society and Royal Fine Art Commission.’ (All references Works file 16/1940-1). The Historic England Register entry for the Gardens states that ‘... the central area of the gardens is laid out as open lawn, kept clear of planting to preserve the views.’ The applicant’s statement about the location of the Buxton Memorial clearly demonstrates a lack of understanding about its placement, by suggesting it was placed accidentally, rather than as a deliberate design decision. Its dismissive comments and conclusions about its obscuration from view by proposed landform, and the proximity of ‘fins’ show a lack of sensitivity to the physical form and the cause for which it was created. In light of the need for the 2015 Modern Day Slavery Act, this misunderstanding of its significance is all the more poignant.</p> <p>2.0. Area of green space lost: While the applicant’s proposal takes up 7% of the total park area with above ground buildings and the fenced, inaccessible plaza/ramp into the learning centre, the development actually reduces the open, usable, accessible, recreational garden space by 26%, with the additional hard standing, service access and access paths. See our plan (LPGT Plan 3) for area calculations. The Garden was designed so the whole space would be used as a public garden for public recreation, not a civic space (of appropriately sombre and respectful tone) with ticket and security buildings, barriers, hedges and hard standing. The 1900’s Act states that the Government (the Commissioners of Works) and Westminster Council agreed the landscape design plan, with LCC contributing some of the land and a contribution of £100,000 towards the Millbank scheme in 1900 on condition that, as regards the land between Millbank and the river (now the southern part of the Gardens), “ the lands... between the new [Millbank] street and the new embankment wall shall be laid out and maintained ... [and] provided for use as a garden open to the public and as an integral part of the existing Victoria Tower Garden”. This is the scheme that was carried out to create a single unified open space out of several separate pieces of land, and we suggest that a civic building does not constitute use as a public garden.</p> <p>3.0. Substantial harm done to the many values of the Gardens The applicant states (VOLUME_3_HTVIA_PART1-5782097, pg 6) ‘Given the limited area of impact, and the high quality of the Proposed Development, we conclude that any harm arising to the RPG is very limited, and less than</p>
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					<p>substantial in terms of the NPPF, and would have to be balanced against the heritage benefits outlined above.’ LPGT response: The collective significance of the Gardens, as described in our Conservation and Significance Statement (LPGT January 2019), will be substantially harmed if the scheme is permitted. The Gardens will no longer wholly function as an open garden and will become, for the large part, a civic paved space. The following values (not identified in the applicants HIA) will be substantially harmed. We do not agree with the applicant’s claim of ‘heritage benefits’ created by the proposals and do not believe that they have set out a strong case that demonstrates these benefits or justifies the harm, as required by NPPF. Rather there will be obscuration of views by the landform and scale of the monument, paths close up against trees, and constriction of existing spatial quality of the Gardens created by the ‘fins’ and other structures. There is no explicit basis for this claim of ‘heritage benefits’ created by the scheme. 3.1 The Values of the Gardens, and the harm that will subsequently be done if the application is approved are set out as follows:</p> <p>Aesthetic Values Harm The openness of the Gardens as achieved by the 1949 design, with the view framed by the mature London Planes planted after the 1900s Act, flanking the simple plane of grass, and designed locations of monuments provide the setting and frames the long view to the Grade I Victoria Tower from the whole lawn, play area and Lambeth Bridge. Views, space and access lost to the public garden from the southern end, constitutes substantial harm. The open setting of Buxton memorial (grade II*), placed as such because of the nature of its highly ornamented gothic architecture, and relationship with Parliament and on axis with the Church. Changed setting, obscuration of views and access; this constitutes substantial harm Spacious play provision, both formal (play area) and informal (grass) recreation. Considerably reduced, therefore constituting substantial harm. Formal play area reduced by 167m2 due to the encroachment of the HMLC. Open space (ie open grass/recreational space) reduced by 26% overall. Refer measured areas plan attached, (ref LPGT Plan 3). Visual calm and tranquillity afforded by trees, flanking and framing the open lawn and key views. Trees threatened, by excavation within RPA’s and pruning to canopies. Likelihood of harm substantiated by lack of detail in the Arboricultural information/AIA submitted, which does not show adequate root protection area (RPA) on lawn side, or sufficient survey of likely deep rooting depth. Once excavation is underway, harm will have been done if deep anchor</p>
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					<p>roots are found, which is likely due to poor soil. Any noticeable dieback or loss of trees will constitute substantial harm Historic Values Harm The location of the grade II* Buxton monument, moved from Parliament Square due to its complex gothic form and need for space, on axis with Dean Stanley St. 'The significance of the [Buxton] monument is enhanced by its location; it commemorates one of Parliament's most momentous Acts, and its principal dedicatee is the parliamentarian responsible for ensuring the passage of that Act' Its setting, form and space will undoubtedly be obscured, as shown in the applicant's visualisation. – especially poignant in light of the necessity for the recent, 2015, Modern Slavery Act, which seems to disregard its importance. We believe this constitutes substantial harm. The creation of the Gardens were enabled by the creation of the Embankment, in response partially to combatting the pollution of the Thames in the 'Great Stink in 1858.' Open space and respite from pollution today is a reminder of the need for uncluttered, accessible open space for all Londoners. Significant harm to the open space, and pollution increased with increased vehicle movements and coach waiting. Views to grade I &amp; II* monuments (illustrative, associative and communal values.) Views will be severely restricted from the south, and axial designed views to the Buxton monument from the west restricted. Substantial Harm. As demonstrated by the applicants own photomontages, due to both the scale and location of the proposals in close proximity to the monuments and interrupting views. Political and other rallies attracting tens of thousands of people have used VTG continuously since its creation as an end point and venue for speeches, as it offers the key large space associated with Parliament and democracy Substantial Harm – space will be less able (by 26% publicly accessible space reduction) to host public events and continue this contribution to democracy. Play (associative value) The Gardens have references to one of the earliest London play areas, specifically designed for the local children in the many dwellings with no access to gardens – the same need remains today.</p> <p>The proposals mean the Spicer monument (curved stone wall and unlisted heritage asset) is moved c.10m south, encroaching into the play area. This means the play area is considerably reduced in size and with a public café in the play space that will be used by HMLC visitors walking through it. The formal play area will be reduced by 167m2 (not including café) and Open space (ie open grass/recreational space) reduced by 26% overall. Refer</p>
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					<p>LPGT measured areas plan attached. This constitutes substantial harm. Communal Values Harm As well as public rallies attracting tens of thousands of people, (see above) the Gardens have played host to events and significant Substantial Harm – space will be less able (by 26% publicly accessible space reduction) to host public events.</p> <p>ceremonial events that have national, regional and community significance. From queues occupying the whole Gardens waiting to see Churchill's lying in state, to New Year's Eve celebrations, to big screens and national rallies. Elements contributing to the other Values described above: Trees Harm Applicants propose that the conditions for trees will be improved in some parts of their applications, and admits in other sections, that it is likely that there will be 'tip dieback' and root-pruning in others. These are not mentioned in the HTVIA, despite comments on the planning application for the scooping report specifically requesting this to be included.</p> <p>Considerable harm to trees is highly possible. This would constitute substantial harm to all the 'values' of the Gardens as mentioned above. This conclusion is based on the following, as observed by qualified arboriculturalists:</p> <p>In brief:</p> <ul style="list-style-type: none"> <li>• There is no Arboricultural Method Statement (AMS) submitted.</li> <li>• RPA's are not reflective of site conditions (poor soil, hard boundaries in river wall and road).</li> <li>• The standard according to NJUG for cutting roots says no roots over 25mm shall be cut, but the applicant says that roots of 60, 90 and 100mm are present (from their surveys) and will be cut. 15 trees will be root pruned, with no admission of the risk of disease from pathogens as a result, although there is an 'admission of risk of dieback'. By allowing this application with insufficient exploration into deep rooting potential, harm is likely to occur if anchor roots are encountered during construction. In such case, they will necessarily need to be severed to enable construction to progress. Any loss to trees or loss of vigour would constitute substantial harm to the Gardens as a whole.</li> </ul> <p>Archaeology Harm The Park sits within the Westminster Abbey and Parliament Square Conservation Area with the northern end of the site included in the Area of Special Archaeological Priority (APA) From the APA: 'Relevance to the outstanding universal value of the World Heritage Site could indicate international significance. In these circumstances a strong</p>
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					<p>emphasis is placed on minimising disturbance to achieve preservation in situ.' Harm will clearly be done. Although archaeology will be well documented, so could be construed as less than substantial harm.</p> <p>4.0 Comment on the Proposals Contravention to WCCs Green Space and other Planning Policies:</p> <p>4.1 WCC Policy S35 Open Space: states that it 'will protect and enhance Westminster's open space network, and work to develop further connections between open spaces. The council will seek to address existing public open space deficiencies, including active play space deficiency, and current and future open space needs... LPGT response: The HMLC proposals are clearly in contravention of this.</p> <p>4.2 WCC Conservation Areas: The character of the conservation areas including its trees are protected, and all trees are protected if each had an individual TPO. LPGT response: The HMLC proposals are clearly in contravention of this, due to the harm mentioned in 1-3 above.</p> <p>4.3 Westminster City Council Ward Profiles 2018: Show the high levels of obesity 28% &amp; 30% of 6 yr olds in the relevant wards, as well as high percentages of dwellings with little or no access to private gardens space. 26% of the children receive free school meals, an indicator of financial stress. 20% of the ward are vulnerable older people.</p> <p>LPGT response: It is accepted that access to open space contributes to combatting obesity, loneliness, as well as having positive contribution to health and well-being generally. By turning VTG into a civic memorial space, attracting over 1m visitors per year, its use as a local park will be diminished, contrary to WCC policy. Open Spaces Strategy 2018 and 2007 'The City Council reflects the aims of the Mayor's London Plan in its own planning policy, with a clear strategic objective within Westminster's City Plan to: "protect and enhance Westminster's open spaces, civic spaces and Blue Ribbon Network, and Westminster's biodiversity; including protecting the unique character and openness of the Royal Parks and other open spaces; and to manage these spaces to ensure areas of relative tranquillity in a city with a daytime population increased every day to over one million workers and visitors." LPGT response: The proposals are clearly in contravention to this with the increase in urbanisation of a tranquil green space, loss of amenity and reduction in play space.</p> <p>4.4 Play Strategy: It is noted in the Open Space Strategy Audit (2007) The strategy notes that there are only four local parks in the city of Westminster and therefore there are significant Areas of Deficiency for</p>
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					<p>access to local parks throughout the City. It shows that VTG (Map WR5) is surrounded by an Area Deficient in publicly accessible Play Space. LPGT response: by reducing the play area, and informal grass play space by 26%, the proposals are clearly contrary to WCC policy. Additionally it is not suitable for such a necessarily sombre monument such as the HMLC to be placed so close to a historically important, and still much used playground. The two uses of a site in such close proximity are entirely incompatible.</p> <p>5.0 Comment on the public consultation</p> <p>The Applicant's Statement of Community Consultation poses the question 'Who decided to locate the memorial in Victoria Tower Gardens? Victoria Tower Gardens was initially suggested by the UK Holocaust Memorial Foundation advisory board as a potential location for the Memorial and Learning Centre. The then Prime Minister, accepted this recommendation and first announced the chosen location at Prime Minister's Questions on 27 January 2016.'</p> <p>NPPF 38 "Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers..."</p> <p>NPPF 39 "Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community" LPGT response: It is clear from this statement that no brownfield sites were considered and that the local community were not given the opportunity to suggest alternative possibilities of a more sustainable nature that would not build on protected and well-used greenspace. The local community have identified other possibilities that would have been a perfect opportunity to improve the area whilst maintaining a desire for juxtaposition with parliament. Therefore the requirements of the NPPF have not been met. Similarly, the applicant chose to refuse a request to see the arboricultural studies, which now do show that harm is likely to the trees. The phase 2 limited public consultation was only concluded two weeks before the planning application was submitted suggesting that this was not a consultation exercise – indeed their own statement does not suggest that the plans would be adapted further. We consider that the requirements of the NPPF have therefore not been met.</p> <p>Summary: 'Heritage' also falls under the NPPF's principles of</p>
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					<p>‘Sustainability’. Similarly, public access, enjoyment and the contribution to public health and well-being by open, green high quality public parks and gardens, as well as their contribution to London’s cultural offer constitutes a principle of ‘Sustainability’.</p> <p>The scale of the proposed development, the size and massing of its structures, its juxtaposition and obscuration of the Buxton Grade II* Memorial, Spicer Memorial, and designed open views to Grade I Victoria Tower and Parliament from the south of the Gardens, will result in significant negative and harmful changes to the Gardens. It will turn a calm garden space into a cluttered, visually congested, urbanised landscape, especially at the south end. This will put further pressure on the rest of the landscape, currently characterised by its open nature. Furthermore, trees supposedly protected by their inclusion in the Conservation Area, are at considerable risk during and after development. The loss of play and open space is clearly in contravention to Westminster City Council’s own planning policies. In destroying its tranquillity, the proposal will fundamentally damage the character of the Registered gardens.</p> <p>LPGT considers that the application constitutes substantial harm to this historic Garden and the setting for the associated heritage assets. The scale of this harm outweighs the public benefit provided by the development, due to the irreconcilable constraints of this site.</p> <p>For these reasons, The London Parks and Gardens Trust object to the application.</p> <p>Yours Sincerely,  Sally Prothero CMLI, MSc Historic Cons. MIFA  Chair, Planning &amp; Conservation Working Group  ENC: Victoria Tower Gardens Conservation and Significance Statement</p> <p><b>TGT WRITTEN RESPONSE 09.02.2018</b> 2nd Response  David Dorward Esq  Westminster City Council  Westminster City Hall  64 Victoria Street  London SW1E 6QP  southplanningteam@westminster.gov.uk</p> <p>Dear Mr Dorward,  The Gardens Trust (GT) is the Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their</p>
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					<p>Victoria Tower Gardens Statement of Significance). 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.</p> <p>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 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</p>
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					<p>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> <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>We would like to draw your attention to the fact that the GT has also discussed this application in great detail with our colleagues in the London Parks &amp; Gardens Trust (LPGT). We are aware of the contents of their response which refers in more detail to policy and we would like to fully endorse their comments.</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,  Dr Marion Harney &amp; Margie Hoffnung  Chair, Conservation Committee &amp; Conservation Officer  The Gardens Trust</p>
Ladbroke Estate	Greater London	E18/1567	II	<p>PLANNING APPLICATION</p> <p>Replacement of existing railings and gates with new to both street ends of Stanley Crescent Gardens. Gardens Rear Of 24/35 Ladbroke Grove, Stanley</p>	<p><b>TGT WRITTEN RESPONSE 13.02.2019</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 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 London Parks &amp; Gardens Trust and would be grateful if you could take our comments</p>

				Crescent, London. ACCESS/GATES, BOUNDARY	<p>into consideration when deciding this application. The proposed railings are in keeping with the gardens so we have no objection to the application. Yours sincerely, Margie Hoffnung Conservation Officer</p> <p><b>CGT WRITTEN RESPONSE 12.02.2019</b> Thank you for contacting the London Parks and Gardens Trust to notify us of this planning application. I apologise for not responding sooner due to ongoing commitments elsewhere. We have no objection to the proposed replacement of the gates, which seem to be in keeping with the general surroundings. Yours sincerely Helen Monger Director London Parks &amp; Gardens Trust</p>
20 And Land Rear Of 22 And 24 St James Way, Sidcup	Greater London	E18/1580	N	PLANNING APPLICATION Demolition of No. 20 St James Way and erection of 4 x 4 bed. detached dwellings with provision of parking and a new access road from St James Way. 20 And Land Rear Of 22 And 24 St James Way, Sidcup, Kent DA14 5ER. DEMOLITION, RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 07.02.2019</b> I am writing on behalf on the Kent Gardens Trust who have been approached by North Cray Residents Association to comment on planning application 18/03181/FUL for the erection of four dwellings to the rear of 20-24 St James Way. The trust have researched North Cray Place as one of the sites in Kent where Lancelot Capability Brown was engaged to carry out alterations to the landscape of North Cray Place in the late eighteenth century. The applicant refers at length to the previous planning application for this site, 16/00348/FUL, which was refused by the planning department and again on appeal, and attempts to demonstrate that this application mitigates the objections and concerns previously raised, including those which we had listed in our letter to you dated 24 April 2016. Our comments on this application are as follows:- The 2016 appeal inspector agreed that the proposed dwellings were back land development and, although this application is smaller, the London Borough of Bexley presumes against backland development. The site forms part of the residential curtilages of existing houses, which was part of the original gardens to North Cray Place, and is now the rear gardens (albeit neglected) of properties which front onto St James Way. The southern boundary to the site is adjacent to the northern edge of the</p>



					<p>High Beeches Conservation Area and as such any development adjacent to it should be sympathetic to the character of the conservation area. This proposal includes the retention of three trees along this boundary of those denoted as Type B trees, in accordance with BS 5837, which are described as 'desirable for retention' in the Arboricultural Survey and Planning Intergration Report, prepared by Quaife Woodlands for the previous application 16/00348/FUL. That report identified one of the trees, a horse chestnut tree as a potential site for roosting bats. All three trees were described as being in fair to good condition and are all 15metres tall. Item 5.4 of the High Beeches Conservation Area, Area Appraisal and Management Plan, states the 'the Council will consider the use of Tree Preservation Orders... where a tree has significant amenity value and is considered to be under threat. This will include trees both within and outside the area, where the trees contribute to the setting of the area....'.</p> <p>It is our view that these three trees, which contribute to the setting on the Conservation Area should be protected with a Tree Preservation Order. The northern boundary of the site is formed of a grade II listed brick wall but no mention is made in the supporting documentation, which accompanies this application, of any measures to protect this wall during the construction process. The house on plot 1 would appear to be sited approximately one metre from this boundary wall, in order that it can be accommodated in the narrow plot width. Digging of the foundations of this house would require particular care alongside the boundary wall to prevent damage and potentially create a threat to the stability of this historic wall, especially as the house foundations would appear to be set at a lower level than the listed wall.</p> <p>Our greatest concern is the threat to the Cedar of Lebanon tree in front of dwelling 4. This particular tree is one of the few surviving trees which were planted by Lancelot Capability Brown in the late 18th century during relandscaping of North Cray Place gardens which originally occupied this site and, as such, is protected along with other similar trees by a Tree Preservation Order. Although the developer has not included the tree within the curtilage of dwelling 4, the crown of the tree is only about 4metres from the front elevation of the house. The crown is also in close proximity to the rear elevation of dwelling 2. It is likely that there will be pressure to undertake severe pruning to provide more light into the habitable rooms and into the rear gardens of the houses in the Grove which will affect the character of the Cedar of Lebanon tree.</p>
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					<p>The distance between the windows of dwellings 2 and 4 and between 4 and those in the Grove would appear to be less than required by planning policy.</p> <p>The proposed development will create a significant change to the rural character enjoyed by the residents of the Grove and St James Way.</p> <p>It is understood that various planning applications have been made in connections with this site in 1967, 1973, 1984 and 2016, all of which have been refused as being back land development and out of character with the surrounding area. Nothing appears to have changed since 2016 and as such we trust that you will refuse this application so that the historical features of this area are maintained.</p> <p>Yours sincerely Mike O'Brien (Trustee) On behalf of Kent Gardens Trust</p>
Bramshill Park	Hampshire	E18/1017	II*	<p>PLANNING APPLICATION and Listed Building Consent Development of 308 residential units (new build and conversion) and associated parking, access and landscaping at Bramshill House and Gardens. To include the demolition of non-listed listed buildings, the construction of a replacement cricket pavilion, the conversion of Bramshill House the Stable Block and Nuffield Hall for use as a single dwelling. Along with Demolition of curtilage listed buildings and maintenance and restoration works. Bramshill House, Bramshill Park, Bramshill, Hook RG27 0JW. RESIDENTIAL</p>	<p><b>TGT WRITTEN RESPONSE 11.02.2019</b></p> <p>I wrote to you on 23rd November 2018 regarding the above application and would be grateful if you could please withdraw this letter. My response could erroneously give the impression that the GT does not object to the above application. The GT strongly objects to proposals to develop housing within the Bramshill landscape and I wish to make that abundantly clear.</p> <p>The Bramshill landscape has recently been upgraded to Grade I. It is an extremely important and unique Jacobean landscape and is the ONLY example in the UK where the house and its associated landscape remain intact. There is a survey of the house and park dated 1699, which shows that its remarkable features and dramatic landscape, approach, house and walled gardens, the avenues, maze, lake and island – were created before this date and confirms that the landscape is contemporary with the building of the house. There are also significant 18th century additions and alterations to the landscape. Together these elements constitute a grander version of the water gardens adjoining Lyveden New Bield in Northamptonshire and are a highly important survival.</p> <p>Hilary Taylor Landscape Associates produced a Conservation Management Plan (2005) for Bramshill, a comprehensive and thorough analysis of the landscape. This report rightly concludes that Bramshill's landscape is remarkable. It considers the 'innovations' carried out by Lord Zouche are a significant proportion of what survives today and that it contributes to our understanding 'of a period of landscape design of which relatively little is</p>

					<p>known and of which very little survives’.</p> <p>The GT does not consider that this application conforms with the revised NPPF paras 192 (a) &amp; (c), 194(b) or 196 and that the erection of any dwellings in this highly important landscape would have a significant detrimental impact.</p> <p>The GT’s concerns were fully outlined by Dr Marion Harney in her letter to your officers on 14th October 2016 regarding applications 16/00726/FUL &amp; 16/00727/FUL. I wish to reiterate these strong objections which still stand.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Gheluvelt Park	Hereford and Worcester	E18/1155	II	PLANNING APPLICATION New 4 bedroom dwelling. LAND ADJACENT TO 1 LAVENDER ROAD, WORCESTER WR3 7AE. RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 14.02.2019</b></p> <p>I have been asked to comment on this application. This is an amendment to a previously granted application. It will have no significant impact on the amenity of Gheluvelt Park.</p> <p>Jane Patton</p>
Panshanger	Hertfordshire	E18/0578	II*	PLANNING APPLICATION Proposed application for the creation of a car park for visitors to Panshanger Country Park together with provision of toilet facilities, information point and association landscaping and ancillary works at Panshanger Quarry, Panshanger Lane, Hertford, Hertfordshire SG14 2NL. PARKING, VISITOR FACILITIES	<p><b>CGT WRITTEN RESPONSE 06.02.2019</b></p> <p>Thank you for consulting Hertfordshire Gardens Trust, a member of The Gardens Trust. In our previous correspondence with Ms Felicity Hart (8th August 2018) we noted the high significance of this Grade II* landscape and the key Repton views along the valley.</p> <p>We have reviewed the additional information supplied on this application and have the following comments.</p> <p>The original Legal Agreement (S52) of 1982 specified 3 car parks, at Thieves Lane, at Birch Green and accessed from North Lodge. None were specified as a ‘main’ car park and indeed the concept of a ‘main’ car park has been advanced without any justification. We believe the original concept of a number of smaller car parks around the perimeter of the core historical landscape, together with better cycling and footpaths linking Panshanger to the wider landscape would be beneficial in terms of spreading the footfall across the park and encouraging access by means other than cars, in line with current County Council policies. The parkland round Thieves Lane car park has become degraded due to the high footfall there and this would be much more damaging with a larger car park as in this application. We are further concerned about the intrusion of car park, toilets and refreshments into a core area of the historic parkland, at the head of the lake in an area to which Repton deliberately drew attention, with ornamental planting on Broadwater Island and the glimpses of the</p>

					<p>countryside beyond the park towards Tewin.</p> <p>The Baseline Options Appraisal is inaccurate in a number of respects. e.g that the setting of the stables has 'been largely devoid of planting'. It was standard practice to screen stables and other service buildings and historic mapping shows this to have been the case at Panshanger. Other examples of inaccuracies could be advanced. Arguments such as that for not putting car parking in Garden Wood include its inappropriateness 'due to its location within the historic core of the park'. This applies equally to the head of the lake position to which this application applies. Although the options document does allow that the proposed location is within the core 'Repton landscape', it does not accord due weight to the harm which we consider would be of a high degree. There is no consideration within the Baseline Appraisal of the harm to the significance of the Brown landscape, as well as the Repton landscape caused by movement of a large number of vehicles within the historic landscape, together with traffic control measures which would be necessary.</p> <p>We have viewed the key views supplied and are unclear as the value of including aerial views, or views which do not accurately reflect the topography.</p> <p>The 'setting' of a heritage asset is the surroundings in which a heritage asset is experienced (HE GPA3v 2, Setting of Heritage Assets 2017). This includes noise, and no consideration has been given to the loss of tranquillity in this part of the park from a car park and associated visitor facilities. The park suffers badly from noise intrusion from the A414 at the eastern end but is tranquil, and appreciated as such, at the western end. It is good practice to appraise a landscape thoroughly and to decide on the evidence where intrusive facilities such as car parks should be sited. The Management Plan still awaits input from the Heritage and Ecology reports and no advice on overall siting of car parks has yet been offered by the heritage group. We therefore consider this application to be premature, and should wait on the recommendations which should be part of that document.</p> <p>The NPPF is clear that enhancing and sustaining the significance of heritage assets is desirable and that great weight should be given to their conservation, with the more important the asset, the greater weight to be given to their conservation. Conversely, harm to these assets, including Grade II* (of the highest significance) landscapes should be exceptional (wholly exceptional where substantial harm is proposed). At the time of</p>
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					<p>the ROMPP in 2001, The Garden History Society commented on detrimental changes to the valley floor (Letter from Anthea Taigel, Asst Conservation Officer, GHS to Brian Owen, HCC 21 June 2001). We consider that these further proposed changes, which would be added to the series of flooded gravel pits now lining the valley floor, would cause cumulative harm, as highlighted in GPA3.v2, and also as Incremental Harm in Vulnerability Brown (TGT 2016) which featured threats to these landscapes including Panshanger.</p> <p>The proposal does not provide clear and convincing justification either for a main car park, as opposed to dispersed parking, or that the public benefits derived from parking in the proposed location would outweigh the considerable harm to the historic landscape core of this II* site. We would recommend that further thought be given to a range of smaller car parks on the edges of the core landscape and that this application be rejected on the grounds of considerable harm to the core historical area.</p> <p>Yours sincerely Kate Harwood Conservation &amp; Planning</p>
169 Knightsfield, Welwyn Garden City	Hertford shire	E18/1528	N	<p>PLANNING APPLICATION Erection of a two-storey building 10 x dwellings and dance studio with underground parking space following demolition of existing building. 169 Knightsfield, Welwyn Garden City AL8 7QG. DEMOLITION, RESIDENTIAL</p>	<p><b>CGT WRITTEN RESPONSE 18.02.2019</b></p> <p>Thank you for consulting the GT.</p> <p>The site proposed for this development lies within the former Digswell landscape laid out by Capability Brown to form the setting of Digswell House. Much of the landscape has now been developed but this woodland and the parkland adjacent are relics of the Brown layout. Within the parkland the rural atmosphere engendered by the sweep of grass and the many trees, are important to the character of this part of the town including the historic character.</p> <p>We are concerned that the height of the development would be insufficiently screened by the existing trees, especially in winter as many of the trees are deciduous. The large amount of glass in the gable end would cause reflection and glare, adversely affecting the parkland to the east and the rural nature of this section Knightsfield to the west.</p> <p>Reduction of the maximum height of the building and the amount of glazing in the gable end, would make this less inappropriate on this site.</p> <p>Kate Harwood</p>
Hanstead House	Hertford shire	E18/1543	N	<p>PLANNING APPLICATION Submission of Reserved Matters (appearance, landscaping, layout</p>	<p><b>CGT WRITTEN RESPONSE 03.02.2019</b></p> <p>I have viewed the documents for the amended plan for Hanstead House (5/2018/2385) but the St Albans planning website appears to be</p>

				and scale) for the refurbishment and extension of the Old Lodge to provide one dwelling and refurbishment and extension of Hanstead House to provide 8 dwellings as part of outline planning permission. Former Hsbc Training Centre Smug Oak Lane Bricket Wood Hertfordshire RESIDENTIAL	<p>unavailable today.</p> <p>I will note my comments below and try to submit them via the website later. If that is not possible, please could you accept these as our comment. Hanstead House gardens are on the HGT list of locally important historic gardens for St Albans District, being a late Arts and Crafts Garden designed by Percy Cane. The gardens comprise a long border, a rose arbour, a Japanese woodland garden, a pergola and subsidiary aviary lawn, all set in an older area of lawn set with specimen trees. Views across the Colne valley to the south were a key part of the design.</p> <p>We welcome the removal of some of the later trees along the southern bastion walk to re-instate the countryside views, and the necessary pruning of the specimen trees to ensure longevity. We welcome the removal of the proposed driveway across the west lawn and the parking under the pergola, with the restoration of this area to its original design intent. The removal of the Copper Beech and other trees and shrubs in the (later) shrubbery to enable parking and bin/cycle stores should cause no harm to the significance of the rest of the garden, as sufficient screening and high quality and sympathetic design for gate piers and bin store, as well as the new planting proposed should ensure no intrusion.</p> <p>Our objections to aspects of the previous landscape proposals have thus been removed. We have no comments to make on the alterations to the house itself as they do not have an impact on the gardens.</p> <p>Kind Regards Kate Harwood Planning &amp; Conservation Hertfordshire Gardens Trust</p>
Hemel Water Gardens	Hertford shire	E18/1577	II	PLANNING APPLICATION DEMOLITION OF EXISTING BUILDING AND CONSTRUCTION OF 60 FLATS WITH GROUND FLOOR RETAIL UNIT AND COVERED PARKING THE FUNCTION ROOMS. 4 WATERHOUSE STREET, HEMEL HEMPSTEAD HP1 1ET. DEMOLITION, RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 18.02.2019</b></p> <p>Thank you for consulting The Gardens Trust, of which HGT is a member. Hemel Water Gardens, laid out in the early 1960s to the designs of Geoffrey Jellicoe has recently been restored by DBC with support from the HLF. These gardens are an extremely important mid-20th century design by the leading landscape designer of his day and the setting of the gardens along the river Gade was particularly significant in how the gardens were enjoyed and how they linked the New town with the older settlements to the north and west.</p> <p>Bank Court and the area around the market place were deliberately low-rise and set back from Waterhouse Street to allow the views across the gardens and thus the visual links intended. These two locations at south</p>

					<p>and north of the gardens are a key part of the setting of the gardens, which are on the Historic England 'Register'.</p> <p>The NPPF requires that the LPA 'should take account of the desirability of sustaining and enhancing the significance of heritage assets' and that 'any harm to, or loss of significance of a designated heritage asset (... from development within its setting' should require clear and convincing justification). The 'Setting of Heritage Assets' (HE GPA3.2) also deals with cumulative change and there have been several developments where the height of buildings along Waterhouse Street has been increased that leads to the 'canyon effect' which Jellicoe wished to avoid as it would constrict the gardens and change the microclimate within them.</p> <p>There is no justification advanced for the severe harm to the setting of the water gardens from the proposed development which is out of scale with the Salvation Army building on the other side of the market place and with the design intent of providing a north 'gateway' to the gardens to mirror that at Bank Court.</p> <p>We consider that a scheme of no more than the current height of buildings would be appropriate here and that this scheme should be amended to take this into account.</p> <p>Kate Harwood</p> <p><b>TGT WRITTEN RESPONSE 22.02.2019</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 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 Hertfordshire Gardens Trust and would be grateful if you could take our comments into consideration when deciding this application.</p> <p>The GT/HGT has been pleased to see the restoration of the Grade II Jellicoe Water Gardens at Hemel Hempstead by DBC with funding from HLF. This makes it surprising to see application 4/03068/18/MOA and its 10-storey building, which if permitted would destroy the setting of Jellicoe's carefully designed landscape, deliberately surrounded with low-rise buildings. The chosen site is one of the most prominent in relation to the Water Gardens, being immediately opposite them. The GT/HGT can see why Synergy Construction and Property Consultants (Planning Statement (PS), p2) consider '8 storeys plus 2 inset penthouse storeys .... makes good use of a site in a built up area, close to town centre facilities' etc. It is clearly a very</p>
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					<p>marketable proposition, but the GT/HGT would not like to see commercial expediency take precedence over preserving the setting and significance of this extremely valuable heritage asset. A well designed, lower and less intrusive building could also provide a mix of commercial, leisure and residential uses without negatively affecting the Jellicoe Water Gardens. We disagree with PS, para 9 : 'The Function rooms site could accommodate a taller building than the existing one or the surrounding ones'. In our opinion this is an entirely negative development.</p> <p>The GT wholeheartedly endorses the comments made by Dr Kate Harwood and OBJECTS strongly to this very unsuitable proposal.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Just House, Northaw	Hertford shire	E18/1618	N	<p>PLANNING APPLICATION</p> <p>Installation of front garden dwarf wall with steel railings and electric gates including relocation of the existing entrances and existing drop kerbs. Just House Coopers Lane Northaw Potters Bar EN6 4NJ BOUNDARY</p>	<p><b>CGT WRITTEN RESPONSE 19.02.2019</b></p> <p>Our comments regarding the inappropriateness of an urban design of gates in the rural Green Belt, which we submitted for Planning Application 6/2018/1737/HOUSE , apply here. The design proposed in this current application does not respect the rural location and would adversely affect the setting of the historic parklands of Northaw Place and Nyn Park."</p> <p>Kate Harwood</p>
Mote Park	Kent	E18/1533	II	<p>PLANNING APPLICATION Works to be carried out at Mote Park Lake Reservoir (to satisfy the Reservoirs Act 1975 "matters in the interests of safety"): works to existing culvert sluice gates; Construct an auxiliary spillway circa 58m wide; Lower ground level on west abutment to accommodate auxiliary spillway; Increase ground level on east abutment to resist overtopping; Construct wave wall along dam crest; Divert HV (11kV) cable; Modify bridge parapet; and Environmental mitigation. Mote Park, Maidstone, Willow Way,</p>	<p><b>TGT WRITTEN RESPONSE 20.02.2019</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 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 Kent Gardens Trust (KGT) and would be grateful if you could take our comments into consideration when deciding this application.</p> <p>We have studied the new documents online. These appear to be more elaborate and detailed versions of the previous ones. Two indirect adverse impacts detailed are on the settings of Mote House and of Turkey Mill due mainly to removal of trees. However, since tree planting and tree growth have gone on for the past 200 years, the settings will have been subject to continual change all the time. The GT/KGT feel that as the link between Mote Park and Turkey Mill is currently obscured, the removal of some trees may actually emphasise this link and could be beneficial.</p> <p>The third impact is on the bridge carrying the western approach road into the park from Maidstone over the spillway. Should there be a major flood</p>



				<p>Maidstone, Kent ME15 7RN. WATER FEATURE</p>	<p>this would affect both Turkey Mill and the centre of Maidstone, so clearly the works are essential. The west-east approach road runs from the entrance to Mote Park to Mote House along the north side of the lake. Before it reaches the lake it runs in a cutting where it crosses the existing spillway on the bridge. The bridge does not appear to be listed in its own right (the original structure was washed away in a previous flood) but only as part of the grade II listed park and garden of Mote Park. The stone parapet is to be replaced by an open metal one to allow water through in the event of a disastrous flood. Its date and history is uncertain according to the documents. We would hope that the design and construction of the new structure would be in keeping with the rest of the stonework but there do not appear to be any designs on the website.</p> <p>The cutting continues eastwards towards the lake and it is this land that will be levelled. The view of the lake will be seen sooner than intended, particularly if the trees have been removed. We understand that one large Turkey oak is to be retained in this area and care will be needed to protect it during any works which may be undertaken.</p> <p>The GT/KGT does not object to the proposed essential works but asks that our comments in relation to bridge design and tree works be taken into consideration.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Nevill Holt	Leicester shire	E18/1573	II	<p>PLANNING APPLICATION Erection of timber posts on the verge. Nevill Holt Hall, Paddock Lane, Nevill Holt, Leicestershire LE16 8EG. MISCELLANEOUS OUTCOME Refused APPEAL LODGED Appeal Ref APP/F2415/W/18/3210833</p>	<p><b>TGT WRITTEN RESPONSE 18.02.2019</b></p> <p>The Gardens Trust (GT) has been alerted very belatedly to the above application and subsequent appeal. We are disappointed that your officers failed to notify us when the original application came out as we are the Statutory Consultee with regard to proposed development affecting all grades of registered sites included by Historic England (HE) on their Register of Parks &amp; Gardens. We would be grateful if you could please take note of our comments below.</p> <p>The Grade II Registered Park and Garden (RPG) extends down the western Avenue approach to Nevill Holt House as well as north on either side of Holt Road and for some way on either side of Drayton Road heading south. The convergence of these roads and the wide grass verges along them provide an imposing setting and approach to the house and the Memorial Gates. The GT appreciates that the owner of Nevill Holt Hall has done much to restore the house and many members of the public are able to</p>

					<p>appreciate this historic designed landscape during the period when the opera is being held. However, the house and its RPG lie very much within a rural environment and in our opinion, the placing of posts along the approach verges has the effect of suburbanising the environment and detracting from the way in which the RPG was originally experienced. The council is responsible for the upkeep of the verges, so it is totally unnecessary for the applicant to repair 'the verges at his own cost with top soil and grass seed or turf. (Planning Statement, Para 4.2).</p> <p>The GT feels that these posts are unnecessary and detract from the setting and significance of the RPG and therefore object to their remaining in place.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Castle Ashby	Northamptonshire	E18/1468	I	<p>PLANNING APPLICATION Change the use of the Walled Garden to be used for private and public events (part retrospective). Walled Garden At Castle Ashby House, Road To Castle Ashby House, Castle Ashby NN7 1LQ. WALLED GARDEN, EVENT/FUNCTION</p>	<p><b>CGT WRITTEN RESPONSE 07.02.2019</b></p> <p>Northamptonshire Gardens Trust (NGT) has no objection to this application but would like to make sure there will be no disturbance to the archaeology of the internal area of the Walled Garden, and ensure that the condition of the present walls are preserved.</p> <p>We note that a noise reduction plan will be prepared.</p> <p>Dr Rod Conlon Member of NGT council of management</p>
Great Harrowden Hall	Northamptonshire	E18/1581	II*	<p>PLANNING APPLICATION Proposed detached tractor shed and proposed lean to buggy store attached to existing garage and stores building. Wellingborough Golf Club, Harrowden Hall, 1 The Slips, Great Harrowden, Wellingborough, Northamptonshire NN9 5AD. MAINTENANCE/STORAGE/OUTBUILDING</p>	<p><b>CGT WRITTEN RESPONSE 27.02.2019</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 Northamptonshire 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 proposals have been examined and there is no objection to the planning application for a tractor shed and buggy store at Wellingborough Golf Club now located at Great Harrowden Hall. We trust the judgement of the Conservation Officer for Wellingborough and we are pleased to see that the trees will be replaced by a mix of elder and maple as recommended by the Council's Tree Officer. It is also encouraging that the new steel fence will be of a similar design and appearance to what is being</p>

					replaced. Carol Fitzgerald On behalf of Northamptonshire Gardens Trust
Cragside	Northumb erland	E18/1582	I	PLANNING APPLICATION Proposal for Installation of Membership Hut and 3 x Mobile Ticket Booths within existing Formal Gardens Car Park at Cragside. Formal Gardens Car Park, Cragside, Northumberland. PARKING, VISITOR FACILITIES	<p><b>TGT WRITTEN RESPONSE 15.02.2019</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 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 Northumberland Gardens Trust and would be grateful if you could take our comments into consideration when deciding this application.</p> <p>The D&amp;A Statement, including the Heritage Statement, sets out clearly the requirement to ease the queuing back to the public road on busy days and the proposal to separate NT members and those requiring tickets/membership for admission at the entrance and send the latter up to the formal gardens car park (created in the 1990's along with the improved access to the formal gardens when the footbridge across the gorge was not open to visitors). Siting the new hut and ticket booths in the formal gardens car park seems a reasonable solution and the trial using a trailer at peak season seems to have been successful. On approach the new recruiters' building would read with the other buildings and structures of the works area at the back of the cottage and would be screened from the formal gardens by existing plantings. The structures are ultimately reversible and utilise existing services.</p> <p>The GT/NGT would agree with the conclusion of the Heritage Statement that the proposals represent a less than substantial harm to the Historic Environment assets, including historic plantings given the inroads already made to the area in the 1990's. We hope that the proposal will provide an opportunity to revisit the plantings in the area and improve on the legacy of the 1990's works to enhance the car park area and the approach from the car park for visitors to the formal garden. The photographs indicate that the existing planting looks rather lean and we also hope that the NT are correct in their expectation of the yew stump regenerating given the earth scraping which appears to have gone on around it.</p> <p>Although not a landscape issue we would query, should this application be permitted, whether after the installation of hut and booths, there is still sufficient provision for disabled parking in this small parking area? The visitor bus will be very full in busy times which could be problematic.</p> <p>Yours sincerely,</p>

					Margie Hoffnung Conservation Officer
Allerton Park	North Yorkshire	E18/1535	II	PLANNING APPLICATION Erection of 1 dwellinghouse; Erection of garage annex; Formation of access with associated hardstanding and landscaping. Allerton Grange Farm, Braimber Lane To Allerton Park Interchange, Allerton Park HG5 OSE. RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 11.02.2019</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>The designed landscape and gardens at Allerton Park are registered grade II with the terrace gardens of mid 19C providing the setting for the house and with surrounding parkland enlarged in the 1720's and reworked in the 1770's. Allerton Grange Farm is in the south west corner of the registered site and close to the brick-walled kitchen garden of c1770, listed grade II with its accompanying Gardeners Cottage. The application site is immediately to the west of the walled garden with access from the A168 which is alongside the A1M.</p> <p>YGT acknowledges the case history of this site in particular the large agricultural building to the south of this proposal and notes the modest massing and details of the proposed dwelling: pantiles, brick walls, timber double glazed windows, black rainwater goods. However, knowing that the main park wall of brick is the boundary to the west with the brick walled garden to the east, we suggest brick walls for the garden of the new dwelling, in a similar manner but lower. This treatment is important as the boundary treatment is the direct feature that will be experienced from the historic park and garden and must be in keeping.</p> <p>Any new structure in the park setting or near listed structures will have some impact on the heritage assets but we consider that the proposed development will cause minimal harm to the grade II registered park and garden.</p> <p>Yours sincerely, Val Hepworth Chairman cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Castle Howard	North Yorkshire	E18/1565	I	PLANNING APPLICATION Change of use of land for the extension of existing children's adventure play area including the erection of	<p><b>CGT WRITTEN RESPONSE 26.02.2019</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 included by Historic England (HE) on their Register of Parks &amp; Gardens at Grade I as</p>

				<p>boardwalk and ropebridge from existing playground over Great Lake and installation of play structure. The Boathouse, Castle Howard, York, North Yorkshire.</p> <p>PLAY AREA</p>	<p>per the above application. The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on behalf of both Trusts. We would be grateful if you could please take our comments into consideration when deciding this application.</p> <p>The gardens, pleasure grounds and park at Castle Howard is on a monumental scale and internationally significant with structures designed by Sir John Vanburgh (1664-1726) and Nicholas Hawksmoor (1661-1736). It is an outstanding example of what has been described as the Heroic Age of English landscape architecture, and the adoption of an informal design, possibly by Stephen Switzer, for Ray Wood has been seen as decisively important for the development of the 'natural landscape style' (from c.mid 18th Century) in England. Later 18th Century works include the creation of the Great Lake on the north side of the Castle which is the site of this planning application. In 1850 the south parterre was remodelled by W A Nesfield (1793-1881) another national landscape and garden designer. He also designed the Atlas Fountain (figures by J Thomas) and undertook works to the South Lake and designed the cascade. Castle Howard is one of only nine grade I landscapes in Yorkshire. Its quality of design and intactness make it especially significant.</p> <p>The new construction for the extension of the existing children's adventure play area by the Great Lake appears to be well-screened and generally low profile and we trust that any harm would be balanced by the benefits for visitors and the financial viability of the estate. We trust that there will not be any tree felling. However, we do have some concerns:</p> <p>The rope bridge is the most visible item and the uprights appear to be 12m tall. We do have serious concerns about the impact of this structure on the registered landscape and the possible setting of the Castle and other listed structures.</p> <p>We also query the proposal that this development will increase nature awareness as in our view a large number of noisy children will sterilise an area which is more or less untouched at present. We also have some concerns that this application is the first of a phased approach and that there may be cumulative impact.</p> <p>We have not been able to undertake a site visit but recommend that officers of your Authority do so before determining this application.</p> <p>We do not have an objection to the principle of extending the existing children's play area and understand the need for Castle Howard to cater for families and continue its financial viability in a competitive tourist</p>
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					<p>environment, but we do have concerns regarding the possible harm as outlined above and note NPPF Feb 2019 paragraphs 193 and 196.</p> <p>Yours sincerely, Val Hepworth Chairman cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Condoover Hall	Shropshire	E18/1595	II	<p>PLANNING APPLICATION Extension of front and side part single and part two storey extensions, balconies, roof alterations, and internal alterations. Ryton Lodge, Condoover, Shrewsbury, Shropshire SY5 7BH. BUILDING ALTERATION</p>	<p><b>CGT WRITTEN RESPONSE 18.02.2019</b></p> <p>We have received notification of the above proposal, from Shropshire Council and from the offices of The Gardens Trust (formerly The Garden History Society) on February 16th 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. The property as outlined above lies within the Grade II Registered Park &amp; Garden boundary of the nearby Condoover Hall, as included on the Historic England National Heritage List. Both the National Planning Policy Framework (July 2018) and Shropshire Council's own SAMDev Plan (2006-26) require that for a proposed development as above, the applicant should submit a statement describing the significance of the heritage asset(s) affected and the impact of the proposed development upon them, or their setting. As far as we are aware this has not been provided by the applicant.</p> <p>We request therefore that an appropriate Heritage Impact Assessment document is prepared, detailing the impacts of the proposed development on the relevant heritage assets and that determination of this case be delayed until such a study is produced.</p> <p>Yours sincerely, Christopher Gallagher for Shropshire Parks &amp; Gardens Trust &amp; The Gardens Trust</p>
Ston Easton Park	Somerset	E17/1702	II	<p>PLANNING APPLICATION Proposed works to a golf club including new academy Course, new driving range, two new golf holes to North-West, three New Golf Holes to South, Front 5 holes converted to 9 hole course, new Spa and Accommodation, new touring caravan park and</p>	<p><b>TGT WRITTEN RESPONSE 08.05.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. Please accept our apologies for the slightly late submission of our comments. We have liaised with our colleagues in the Somerset Gardens Trust and would be grateful if you could take our observations into consideration when deciding this application. We have read the documents available on line and one of our major</p>

				<p>amenities, conversion of existing driving range to accommodation and proposed car park extension. Farrington Golf Club, Marsh Lane, Ston Easton, Wells BS39 6TS. GOLF, CAMPING</p>	<p>concerns is further expansion and development within a Grade II RPG, with more in the pipeline should the current ventures prove successful. Just because permission was granted for the original Farrington Golf Club in the early 1990s with the course being developed between 1993 and 1996, does not mean that a greatly enlarged facility would ever be appropriate in this setting. If the original application were made again today, we would argue that the likelihood of a large golf development within a Repton Parkland setting would be hard to justify as bunkers, bunds and closely mown greens are not features that generally sit well within a landscape such as this.</p> <p>The park is the subject of Repton Red Book. 2018 is the bicentenary of his death and much new research is being undertaken, highlighting the importance and sensitivity of sites such as this parkland setting for Grade I Ston Easton Park. The applicant has gone to some trouble to follow HE's guidance for golf course development but both the Heritage Value &amp; Impact Assessment Report and the Design and Access Statement would appear to have been written by the same anonymous person, with no details of their qualifications or experience in this field. This in itself would not be a problem, but as these reports contain many typing errors, a lack of clarity regarding the mitigation measures proposed, as well as some opacity as to where the HE Register entry for Ston Easton ends and the author's text continues, the lack of academic rigour diminishes the confidence the GT has in their content. Documents are referred to in association with the Heritage Statement but the plans produced are not easy to interpret and do not give details such as the species or size of trees (except saying they would be ones Repton might have planted). Given the sensitivity of the site and the proximity of some of the development to the main house, we would have liked to see much more detail and information regarding the visual impact of the proposals. D&amp;A 2.9 states "a mature hedge to the south of the land screens views from the SE direction, with only glimpses towards it from the Grade I listed Ston Easton Park." We would have liked to have seen photos of these glimpses, as well as diagrams showing designed vistas and view points within Repton's design. There is nothing to indicate which areas are of the greatest sensitivity and more information regarding the visual impact of the proposals what other sites might have been considered for new features proposed.</p> <p>We welcome the applicant's stated intent to refrain as much as possible from creating new bunkers in keeping with HE's principles, but the</p>
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					<p>suggested 1.8 high close boarded fence proposed around the boundaries of North Lawn would be entirely out of keeping with the aesthetics of a Repton landscape, and every bit as harmful.</p> <p>Mendip DC's Local Plan, Policy DP3 Heritage Conservation, Para 1b, states that an applicant must "Justify any harm to a Heritage Asset and demonstrate the overriding public benefits which would outweigh the damage to that Asset and its setting." We feel that this application does not meet that criteria and further development, plus the stated wish for yet more expansion of the facilities, will considerably erode the setting and significance of this important site.</p> <p>The GT and the Somerset Gardens Trust therefore OBJECT to this application.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer The Gardens Trust</p>
Wentworth Castle	South Yorkshire	E18/1541	I	<p>PLANNING APPLICATION Internal alterations to long barn (ground floor), new timber bin store to rear of Long Barn, rebuilding of play area garden wall (junction of north east/south wall), stone repairs to Serpentine Bridge. Wentworth Castle Gardens, Lowe Lane, Stainborough, Barnsley S75 3ET. HYBRID</p>	<p><b>CGT WRITTEN RESPONSE 18.02.2019</b></p> <p>Wentworth Castle Gardens, Lowe Lane, Stainborough, Barnsley S75 3ET. Thank you for consulting The Gardens Trust. We are sorry that this consultation has come in so late. 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>As noted in our letter of 21st February, Wentworth Castle and Stainborough Park is the only Grade I Registered Park and Garden in South Yorkshire and one of only nine in the whole of the County. This is the highest grade reflecting its exceptional heritage significance as a historic designed landscape. We are very supportive of the National Trust's bid to reopen the Park and Gardens to the visiting public.</p> <p>In addition to our comments in our earlier letter of 21st February, we would like to make the following comments on 2019/0012 and 2018/1568: The plan used by the arboricultural consultant is completely out of date as it is from the pre- Heritage Lottery Fund phase.</p> <p>In our view the beginning and ends of the trenches are not being treated seriously, particularly near the Gun Room on its way to the Coach House where digging could well come across significant remains, if it is, as</p>



					<p>suggested by one or two references the 'Fountain Walk' leading up to an eye catcher near Lady Mary's Obelisk. We are not aware of any digging work in to this area during the Wentworth Castle Trust's stewardship and therefore probably little if any beforehand. So, we recommend care during the excavation and an archaeological watching brief for this area.</p> <p>As noted in our letter of 21st February, the young hornbeams were a direct replacement for original trees planted in a line parallel to Shed Lane and so in our view should really have more importance than the young Wellingtonia (a tree species introduced to this country in c.1854) that the previous head gardener liked, encouraging individuals as gifts.</p> <p>There is no survey of the yew tree in the church yard and no mention of it when detailing with the bin store application.</p> <p>We trust that our comments in this and our earlier letter will be carefully taken into account during the determination of these planning applications.</p> <p>Yours sincerely, Val Hepworth Chairman cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Sheffield General Cemetery	South Yorkshire	E18/1656	II*	<p>PLANNING APPLICATION</p> <p>Demolition of warehouse and erection of 10no dwellinghouses (Use Class C3) with associated parking. 67 Stalker Lees Road, Sheffield S11 8NP. DEMOLITION, RESIDENTIAL</p>	<p><b>CGT WRITTEN RESPONSE 26.02.2019</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 included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on behalf of both Trusts. We would be grateful if you could please take our comments into consideration when deciding this application.</p> <p>This planning application affects an outstanding example of a Victorian cemetery, recently awarded £3m Heritage Lottery Funding in order to restore it. As you will know it has been on the 'Heritage at Risk' register for some time so we are now hopeful of a brighter future. We are concerned that this planning proposal could undermine this future.</p> <p>The cemetery's national importance is signified by its being registered at grade II* on the Historic England Register of Historic Parks and Gardens. (A high grade for a cemetery. It is one of only fifty- seven grade II* from a national total of two hundred and forty- five registered cemeteries). It has a number of other designated heritage assets including several impacted by this planning application viz.</p>

					<p>Main Gateway and Lodges grade II*</p> <p>Catacombs grade II</p> <p>General Cemetery Conservation Area</p> <p>Porter Brook Conservation Area</p> <p>The Sheffield General Cemetery was set up in response to overcrowding and poor conditions in Sheffield churchyards, exacerbated by the cholera epidemic in 1832. It signified the emancipation of the independence movement in Sheffield (independence from the Church of England regarding burial). The original section of the Cemetery - immediately to the south of this planning application - was unconsecrated ground to symbolise the agenda of the non-conformists and the buildings were in classical style, recognisably different from the gothic style of the Church of England. The design (1834) was by Samuel Worth, with assistance from Robert Marnock. Worth was a well-known architect who also designed the Cutlers' Hall and Moorgate Cemetery in Rotherham (1841); Marnock became a designer with a national and international reputation who in addition to his work nationally on public parks was known for cemetery designs including, Northampton General Cemetery, Stroud General Cemetery and Ely Cemetery. The design of the Sheffield General Cemetery was used by John Claudius Loudon, (a notable designer of parks and gardens and arguably the most distinguished gardening author of the age), as a prototypical example for a hilly site in his influential book on cemetery design. [J. C Loudon, On the Laying Out, Planting, and Managing of Cemeteries: And on the improvement of churchyards, London: Longman, Brown, Green, and Longmans, 1843; p.18-19; and Brent Elliott Victorian Gardens, London: B T Batsford, 1986]. For this purpose, it was slightly simplified, but is still recognisable.</p> <p>Although we do not have any objection to the principle of redevelopment, this planning application as proposed, although outside the registered area, will harm the setting and significance of all the designated heritage assets cited above. We are concerned about the proposed massing, scale and materials and its situation almost abutting the Main Gateway and Lodges to the cemetery and the impact on the historical and important views. The Planning and Heritage Statement has not addressed this. There is no mention of the Main Gateway and Lodges (and the curtilage rampart wall structure attached to the Gatehouse), despite the application site being in such close proximity. The approach to the grade II* listed Lodge along Cemetery Avenue is a key part of the registered designed landscape</p>
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					<p>and was historically the processional route flanked by trees. The proposed terrace of housing should be designed to respect this situation.</p> <p>In our view this application is not compliant with paragraphs 189, 190, 193 of the NPPF, February 2019, and the statutory duty of the Planning (Listed Buildings and Conservation Area) Act 1990 to have 'special regard' to the desirability of preserving the setting of adjacent listed buildings.</p> <p>We do not have an objection to the principle of redevelopment but we consider the evidence points to the proposed planning application causing substantial harm to the setting and significance of the grade II* registered park and garden and its other designated heritage assets. The Gardens Trust and the Yorkshire Gardens Trust therefore objects to the development as proposed and asks that the Council refuse planning permission.</p> <p>Yours sincerely Val Hepworth Chairman cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Wentworth Castle	South Yorkshire	E18/1694	I	<p>PLANNING APPLICATION</p> <p>Trenching works to supply WAN Fibre network and connection into Long Barn and LAN network to existing car park [site of proposed visitor reception building]. Removal of three trees. Installation of underground grease trap and associated works to cafe at Long Barn. Wentworth Castle Gardens, Lowe Lane, Stainborough, Barnsley S75 3ET. HYBRID</p>	<p><b>CGT WRITTEN RESPONSE 28.02.2019</b></p> <p>Thank you for consulting The Gardens Trust. We are sorry that this consultation has come in so late. 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>As noted in our letter of 21st February, Wentworth Castle and Stainborough Park is the only Grade I Registered Park and Garden in South Yorkshire and one of only nine in the whole of the County. This is the highest grade reflecting its exceptional heritage significance as a historic designed landscape. We are very supportive of the National Trust's bid to reopen the Park and Gardens to the visiting public.</p> <p>In addition to our comments in our earlier letter of 21st February, we would like to make the following comments on 2019/0012 and 2018/1568: The plan used by the arboricultural consultant is completely out of date as it is from the pre- Heritage Lottery Fund phase.</p> <p>In our view the beginning and ends of the trenches are not being treated seriously, particularly near the Gun Room on its way to the Coach House where digging could well come across significant remains, if it is, as</p>

					<p>suggested by one or two references the 'Fountain Walk' leading up to an eye catcher near Lady Mary's Obelisk. We are not aware of any digging work in to this area during the Wentworth Castle Trust's stewardship and therefore probably little if any beforehand. So, we recommend care during the excavation and an archaeological watching brief for this area.</p> <p>As noted in our letter of 21st February, the young hornbeams were a direct replacement for original trees planted in a line parallel to Shed Lane and so in our view should really have more importance than the young Wellingtonia (a tree species introduced to this country in c.1854) that the previous head gardener liked, encouraging individuals as gifts.</p> <p>There is no survey of the yew tree in the church yard and no mention of it when detailing with the bin store application.</p> <p>We trust that our comments in this and our earlier letter will be carefully taken into account during the determination of these planning applications.</p> <p>Yours sincerely, Val Hepworth Chairman cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Wentworth Castle	South Yorkshire	E18/1695	I	<p>PLANNING APPLICATION</p> <p>Construction of Visitor Reception Building including provision of access ramp, removal of 4 trees and associated fencing and landscaping. Wentworth Castle Gardens, Lowe Lane, Stainborough, Barnsley S75 3ET. VISITOR FACILITIES</p>	<p><b>CGT WRITTEN RESPONSE 18.02.2019</b></p> <p>Thank you for consulting The Gardens Trust. We are sorry that this consultation has come in so late. 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>As noted in our letter of 21st February, Wentworth Castle and Stainborough Park is the only Grade I Registered Park and Garden in South Yorkshire and one of only nine in the whole of the County. This is the highest grade reflecting its exceptional heritage significance as a historic designed landscape. We are very supportive of the National Trust's bid to reopen the Park and Gardens to the visiting public.</p> <p>In addition to our comments in our earlier letter of 21st February, we would like to make the following comments on 2019/0012 and 2018/1568: The plan used by the arboricultural consultant is completely out of date as it is from the pre- Heritage Lottery Fund phase.</p> <p>In our view the beginning and ends of the trenches are not being treated</p>

					<p>seriously, particularly near the Gun Room on its way to the Coach House where digging could well come across significant remains, if it is, as suggested by one or two references the 'Fountain Walk' leading up to an eye catcher near Lady Mary's Obelisk. We are not aware of any digging work in to this area during the Wentworth Castle Trust's stewardship and therefore probably little if any beforehand. So, we recommend care during the excavation and an archaeological watching brief for this area.</p> <p>As noted in our letter of 21st February, the young hornbeams were a direct replacement for original trees planted in a line parallel to Shed Lane and so in our view should really have more importance than the young Wellingtonia (a tree species introduced to this country in c.1854) that the previous head gardener liked, encouraging individuals as gifts.</p> <p>There is no survey of the yew tree in the church yard and no mention of it when detailing with the bin store application.</p> <p>We trust that our comments in this and our earlier letter will be carefully taken into account during the determination of these planning applications.</p> <p>Yours sincerely, Val Hepworth Chairman cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Hampton Court	Surrey	E18/1384	I	<p>PLANNING APPLICATION</p> <p>Development to provide 97 dwelling units, a hotel (84 bedrooms) and retail units (within use classes A1, A2 and/or A3) together with access, station interchange, car parking, servicing, new public realm, landscaping and other associated works following demolition of some existing buildings and structures on site including Hampton Court Motors. Jolly Boatman and Hampton Court Station Redevelopment Area, Hampton Court Way, East Molesey, Surrey KT8 9AE. MAJOR</p>	<p><b>WRITTEN RESPONSE FROM DR SARAH RUTHERFORD 11.02.2019</b></p> <p>... I write in a personal capacity to offer comments on this application. I have been a professional garden historian and historic environment adviser for over 25 years including as Head of the English Heritage Parks and Gardens Register for 3 years. As part of my work preparing historic environment conservation plans and setting studies I have seen and studied many designed landscapes, together with the contribution made by their architectural components, and their settings. In a voluntary capacity I frequently review major planning applications on behalf of the Buckinghamshire Gardens Trust to advise the Statutory Consultee, The Gardens Trust, on cases. I am the author of a best-selling book on Lancelot Brown, published by the National Trust in 2016, as well as 7 other reference books on aspects of architectural, garden and landscape history. I object most strongly to this application to build a large development in the immediate and very significant open setting of Hampton Court Palace and its equally important grounds. The proposal causes substantial and irreversible harm to the setting of an extensive and internationally</p>

				HYBRID	<p>significant cultural ensemble for the following reasons: The Government's adviser on the historic environment, Historic England summarises the effect of setting as follows: 'Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated .... Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.'</p> <p>1 Hampton Court (listed Grade I), its immediate designed setting (Registered Grade I) and related aspects forms an ensemble of outstanding cultural and artistic quality, displaying all the qualities and significance of a World Heritage Site (WHS). The ensemble forms part of a larger potential WHS along this stretch of the River Thames, known as the Arcadian Thames, as far downstream as the WHS of the Royal Botanic Gardens Kew. There has been considerable study of this cultural group associated with the Arcadian Thames over the last 30 years. In between the cultural high spots of the Arcadian Thames, the banks of the Thames link those many sites that together influenced the Western World in the C18 and have continued to since. The individual significance of the Hampton Court ensemble and its contribution to the wider Arcadian Thames cannot be emphasized too highly, particularly for the key period when the Palace was created in the early C16 and as it developed into a magnificent royal residence from the C16-C18. Here in the isolated and rural setting away from the urban royal court many momentous decisions in the history of Britain occurred. Increasing the significance of Hampton Court individually and as part of this cultural ensemble of the Arcadian Thames is the surprising, rare and highly valuable survival of the important landscape elements of its setting. This includes the largely rural quality of the extensive Surrey river bank alongside the park, on part of which the proposed development is situated. This bucolic open landscape contrasts with the highly formal designed landscape of Bushy Park on the opposite side of the park, the village character of East Molesey and the regionally important town of Kingston-Upon-Thames. This extensive stretch of the river bank has survived largely intact and without significant irreversible development so that it is still of a character and quality that Henry VIII and successive monarchs who used Hampton Court would still recognise. The setting includes not just views between it and the Palace and grounds largely unaltered since the 1840s but the continued land use of the riverside as a rural buffer to modern Surrey. This is an extraordinary survival and of the utmost significance to the setting of Hampton Court.</p>
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					<p>Very little has changed in this integral riverine setting of the Palace and its designed grounds since the crucial Tudor approach along the river was established in the 1520s. The strongest visual intervention is Lutyens' 1930s bridge, the high architectural value of which is itself recognised by its listing and it contrasts in style but not scale alongside the character of the Palace. More sensitive in style and scale is the 1840s Hampton Court station which is built in Jacobethan-style brick that echoes that of the Palace, is small in scale and aptly heralds the 'modern' railway approach to the Palace. The station stands isolated acting as a remote gate lodge to the Palace in the modern approach from London. The station appears quiet, self-effacing and above all subordinate to the Palace across the river. Its intended setting was the rural Cigarette Island and the river bank beyond the Island, with the small-scale village of Hampton Court opposite. This largely vernacular rural setting frames and emphasizes the artistic quality of the designed landscape and architecture of the Palace and its extensive grounds. Visitors for nearly 200 years have enjoyed as they alight the opportunity to glimpse the distant Palace over the river, and experience the rural setting that largely persists on this side of the river. The building is deliberately a minor incident in views from the Palace, its major original approach from the river and the surrounding gardens and grounds. Thus Hampton Court and its setting is a complex and fragile collection of outstanding value to Britain and beyond.</p> <p>Historic England emphasizes that the setting of the historic environment forms a key part of the appreciation and value of the cultural artefact(s).<sup>2</sup></p> <p>The proposed development would cause substantial harm to the key setting of the Palace, grounds and reciprocal views with the site for the following reasons:</p> <ul style="list-style-type: none"> <li>☐ The proposed development causes a major change of use and character, together with loss of open space in the setting of the Palace and station. The development site is clearly incapable of accommodating anything more than a small scale of development without substantial and irreversible harm to views and setting.</li> <li>☐ The integral views established since the 1840s between the station and the Palace and grounds will be destroyed.</li> <li>☐ Notwithstanding the irreversible and substantial damage to the fabric and character of the Palace setting, screening of the development is impossible to achieve because of the height of it.</li> <li>☐ There has been no systematic and detailed study of the setting of the Palace to demonstrate effectively the areas of highest significance, identify</li> </ul>
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					<p>areas where development might be acceptable, and the level of development that might be acceptable and will not cause substantial harm.<sup>3</sup></p> <p>There is no creditable study of the impact and damage that will be caused to the artistic and cultural qualities of the Palace and grounds, and indeed on the Listed bridge and the riverside setting of these cultural elements.</p> <p>The irreversible nature of this development, no matter what the design detail, will leave for our successors a blight on the setting of this unique cultural and artistic ensemble within the Arcadian Thames.</p> <p>This proposal is contrary to NPPF paras 190, 192(b) &amp; (c), 193, 194 (b) &amp; 195. A principle should be established in Local Plan Policy that this site is incapable of accommodating anything more than small scale and sensitively designed development that respects its position in relation to the Palace ensemble. The Garden History Society (now The Gardens Trust) strongly objected for similar reasons to a previous similar scheme in 2008, which was unacceptably damaging to the Palace landscape. In summary, the international cultural and artistic significance of the Palace and its extensive landscape will be compromised by an ill-judged and insensitive intervention which future generations will deplore. For these reasons I urge you to refuse this application.</p> <p>Yours faithfully, Dr Sarah Rutherford</p> <p>CGT WRITTEN RESPONSE 11.02.2019</p> <p>I write as a garden and architectural historian, retired architect, and former employee of English Heritage, to object strongly to the current proposals on the behalf of the London Parks and Gardens Trust, of which I am a former chairman.</p> <p>Hampton Court Palace, Home Park, grounds and gardens, which are immediately across the River Thames from the proposed development site, are covered by the highest gradings of listing - listed buildings, scheduled monument, registered park and garden, conservation area, etc, and are of national and international importance.</p> <p>Hampton Court Station was designed in 1846 by Sir William Tite as a tactful structure to cater for visitors to the palace in a manner that did not vie with its important neighbour or detract from its setting. The current proposals, in contrast, seriously detract from the riverside setting of the</p>
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					palace and its gardens. The proposed structures are too tall, too close to the river, and constitute a gross and unacceptable overdevelopment of a sensitive site. I urge your council to refuse consent for the scheme. CHRIS SUMNER
The Deepdene (including Chart Park)	Surrey	E18/1546	II*	PLANNING APPLICATION Erection of extensions to provide 4 No. new apartments at roof level together with elevational changes to the existing building and associated landscaping works, plus the transfer of land to the Council relating to the Deepdene Trail. Kuoni House, Deepdene Avenue, Dorking, Surrey. RESIDENTIAL, BUILDING ALTERATION	<b>CGT WRITTEN RESPONSE 08.02.2019</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 on the Register of Parks and Gardens. The Surrey 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 the GT's behalf in respect of such consultations. At 8 February the documents found online do not include any explanatory text nor the expected Design and Heritage Statements for development in a Registered Parks and Gardens site. It is appreciated that such information can be proportionate to the proposal but something is needed. The Land Transfer Plan also lacks a key to the areas marked 1, 2, 3, and 4 that would assist an understanding of what is intended. Without such documentation it is not possible to make a proper comment at this time. Don Josey On behalf of the Surrey Gardens Trust a member of the Gardens Trust
Warwick Castle	Warwick shire	E18/1521	I	PLANNING APPLICATION Proposed installation of temporary structures to create a temporary jousting arena on River Island, to accommodate live shows during the period from May to September for a period of five years at Warwick Castle. Warwick Castle, Castle Hill, Warwick CV34 4QX. VISITOR ATTRACTION	<b>TGT WRITTEN RESPONSE 26.02.2019</b> Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks & Gardens, as per the above application. We have liaised with our colleagues in the Warwickshire Gardens Trust (WGT) and would be grateful if you could take our comments into consideration when deciding this application. The GT/WGT have studied the documents for Merlin Entertainment's most recent visitor attraction planning application, the jousting arena. Even though we regularly respond to these we must yet again repeat and stress the enormous importance of this historic designed landscape, as it would seem that our comments are always ignored in favour of increasing visitor revenue to the detriment of the historic landscape. The HE entry for Warwick Castle states : "The principal historic interest of the Park and Gardens is in their association with 'Capability' Brown.... and also Robert Marnock and Harold Peto, who designed mid-19th and early-20th century

					<p>gardens respectively. Together these layers of history which illustrate the improvements and tastes of the various owners ... contribute to the significance of the Grade I grounds.”</p> <p>In support of the proposal Merlin have proposed a theory (repeated more than once) that the island was host to a range of visitor attractions since at least the C18. They offer no justification for this and we are unaware of any such until the small and impermanent menagerie of Countess Daisy in the 1890’s. Even this is more likely to have been for her own amusement than to attract visitors. Historically, the island was an open space, with tree planting designed to frame the view of the river front of the castle.</p> <p>Numerous illustrations from Canaletto (1748) onwards make this clear. In this instance Merlin Entertainments wishes to make the installation of the jousting arena an annual attraction for 5 months each year for the next five years. They propose April and October for assembly and disassembly, thus occupying the site for the full half year of the summer season. We are informed that in its previous existence, without a planning application, the structures continued in place into the winter, which gives little comfort that their presence will be limited even to six or seven months.</p> <p>Various photos show the site next to the boathouse taken from the Castle Mount (Planning Design &amp; Access Statement (PDAS) Fig 2.3 &amp; 2.2 (from across the R Avon looking south – also shown in Heritage Impact Assessment (HIA) Figs 1.1 &amp; 5.1), 4.2 from within jousting arena showing proximity of the Castle and illustrating the large, brightly coloured red and white banners at the entrance to the arena looking NE to the Castle. These pictures demonstrate very clearly how visible the site is within the RPG.</p> <p>Indeed in the photo shown twice of the view towards the jousting arena taken from the north side of the river, south west of the Castle mound, the arena looks as if it were a railway station terminus/platform, incongruously placed directly behind the restored thatched boathouse. In our opinion this application does not comply with the Warwick District Local Plan 2011-2029 (2017) as it negatively affects the character and quality of the RPG and does not in any way integrate well with the existing landscape and therefore directly contradicts HIA Para 3.8, Point 1. The photo of the brightly coloured flags instantly shows that the statement within the HIA, (para 5.4) that the ‘proposed temporary structures are sensitive in terms of their design. They .... have a simple, muted colour scheme’ is incorrect, and we also disagree with HIA 5.4 ‘As a result of its sensitive scale and material palette, the arena would not alter the character of the parkland, especially</p>
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					<p>in significant views taken from the Castle Mound (Figure 6.1) where it would generally blend in with the natural green landscape to the south.’ The HIA documentation also ignores in its assessment of the effects of this proposed structure, the negative effect of the jousting pavilion in views towards the island from Spiers Lodge (II*) and Harold Peto’s formal gardens for the Countess of Warwick, as well as notably from the plantation at the NE of the island which corresponds to Brown’s clump of trees.</p> <p>We were intrigued to read the comments of the castle on the proposed Avon Navigation, stating that there had been consideration of providing a separate entrance to the grounds for boaters, but that that and infrastructure to support moorings would damage the landscape. (Socio Economic Study para 5.3.3). The current proposal appears to be several times more damaging than this.</p> <p>By claiming a limited visual relationship between the site and other heritage assets, the HIA avoids mentioning the impact on the listed 55 Mill Street and its locally listed garden as well as the auditory impact on many more heritage assets in Mill Street, Bridge End and beyond</p> <p>The Design and access statement acknowledges the impact of noise on nearby properties. We are not convinced that a noise limiter device will sufficiently mitigate this. Merlin Entertainment’s regular applications for new visitor entertainment facilities each time further compound the damage already done to this hugely important RPG and resultant loss of significance. We would urge your officers to bear in mind HE’s advice : ‘The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise .... from other land uses in the vicinity, and by our understanding of the historic relationship between places’. This document also (p12) states that ‘Cumulative assessment is required under the EU Directive on EIA. Its purpose is to identify impacts that are the result of introducing the development into the view in combination with other existing and proposed developments’.</p> <p>As you will be aware, the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that, when considering whether to grant planning permission for development which affects a listed building or its setting (ie. the RPG), the local planning authority shall have special regard (our emphasis) to the desirability of preserving the building or its setting or any</p>
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					<p>features of special architectural or historic interest which it possesses (Section 66(1)). The Courts have interpreted preservation as meaning to keep safe from harm. The statutory duty to have special regard to a listed building means that decision makers should give considerable importance and weight to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise. The considerable importance and weight applies to all harm, although with greater force the more important the listed building or setting. If harm is identified then there is a strong presumption against the grant of planning permission. The GT/WGT strongly urge WDC to halt the relentless commercialisation of the site and limit the loss of significance and setting to the unfortunate structures already in place. The GT/WGT strongly OBJECTS to this application.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Harewood House	West Yorkshire	E18/1534	I	<p>PLANNING APPLICATION New timber fence to the eastern perimeter of the bird garden/ zoo with a secondary fence set off one metre away. Harewood House, Harrogate Road, Harewood. ZOO/SAFARI PARK, BOUNDARY</p>	<p><b>CGT WRITTEN RESPONSE 11.02.2019</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>The site is located in the Grade I Registered Park and Garden at Harewood House and to the south of the House (listed grade I). This, the highest grade, reflects its exceptional heritage significance as a historic designed landscape and is one of only nine grade I landscapes in Yorkshire. Nationally important landscape designers have been engaged by the Lascelles family, from the 18C designers, Richard Woods, Thomas White and Lancelot 'Capability' Brown, followed by alterations and additions c 1800 by Humphry Repton and then in the mid 19C Charles Barry and William Andrews Nesfield. The designs by Brown which developed and formed the landscape to the south of the house are of particular significance as they intentionally complement the other highly graded heritage assets. The '... position [of the buildings] was chosen to take advantage of the qualities of aspect and prospect afforded by the elevated site' (National Heritage List for England, official listing) that was then further enhanced by Brown's interventions. The landscape was</p>

					<p>intentionally composed with trees located to create uninterrupted, framed views of the stables, lake and parkland as seen from the house and is very significant. It was painted many times by J M W Turner and others and is shown in many views of Harewood from the south and south east.</p> <p>We have serious concerns regarding the further encroachment of the Bird Garden/Zoo into the parkland, and thus to its visibility from the house terrace and the interruption that it would cause to the historically important and intentional views. The fences would produce an arbitrary and prominent line in the landscape and further exacerbate the negative impact that we consider already exists in the designed composition. They will detract from the form of the topography, appreciation of design features and legibility of the original design intention.</p> <p>We understand that there is an urgent need for improvements to the fencing for the animals, and we appreciate the visitor and conservation value of the Bird Garden, but we understand that the grazing animals were only introduced recently and query whether less harmful alternatives have been considered.</p> <p>We note the Heritage Statement Proposal para 2; 'Whilst the fence will be visible from parts of the Estate, including the terrace to the main house, the new fence will form part of the existing enclosures surrounding the stable block and will quickly assimilate into the viewed landscape...' We do not agree and we do not consider that the harmful impact on the heritage assets has been adequately justified. In our view this planning application does not meet the requirements of paragraphs 184, 192, 193, 194 and 196 of the NPPF July 2018.</p> <p>In conclusion we consider that the evidence points to the proposed development causing harm to a grade I registered park and garden. Permitting harm to a highly designated heritage asset should be wholly exceptional and justified which we do not believe is the case in this instance. YGT/GT therefore objects to the proposed development and asks that the Council refuse planning permission. We hope that a more sympathetic solution can be found.</p> <p>Yours sincerely, Val Hepworth Chairman cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Stoney Royd Cemetery	West Yorkshire	E18/1542	II	PLANNING APPLICATION Dwelling (Outline). Adj 11 Whitegate,	<p><b>CGT WRITTEN RESPONSE 21.02.2019</b></p> <p>Thank you for consulting The Gardens Trust. The Gardens Trust (GT) is the</p>

				<p>Siddal, Halifax, West Yorkshire HX3 9AE. RESIDENTIAL</p>	<p>statutory consultee regarding proposed development affecting a site on the Register; in this application Stoney Royd Cemetery. 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>Stoney Royd Cemetery is a good example of a mid- Victorian cemetery which largely retains its original striking layout on dramatic topography. It is on the Register at grade II and was designed by the eminent landscape designer Edward Milner (d. 1884) in c.1860, following a design competition. Milner had assisted Joseph Paxton in the design of People's Park, Halifax completed in 1857. The cemetery design incorporated some of the original features of the Stoney Royd estate. (The estate dating from c.1764).</p> <p>The proposed development site is not on the boundary of the registered cemetery and is separated from it by a belt of trees/scrubland. The proposal is at the end of a terrace, with other cottages nearby, so provided matching building materials are used it should blend with existing development.</p> <p>We do not consider that the proposed development will cause harm to the registered cemetery and have no objection.</p> <p>Yours sincerely, Val Hepworth Chairman Cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Shibden Hall	West Yorkshire	E18/1568	II	<p>PLANNING APPLICATION Attach a blue plaque to the wall of a listed building to mark where "Anne Lister" once lived.(Listed Building Consent). Shibden Hall House, Shibden Park, Godley Lane, Halifax, Calderdale HX3 6XG. MISCELLANEOUS</p>	<p><b>CGT WRITTEN RESPONSE 21.02.2019</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; in this application Stoney Royd Cemetery. 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>Stoney Royd Cemetery is a good example of a mid- Victorian cemetery which largely retains its original striking layout on dramatic topography. It is on the Register at grade II and was designed by the eminent landscape designer Edward Milner (d. 1884) in c.1860, following a design competition. Milner had assisted Joseph Paxton in the design of People's</p>

					<p>Park, Halifax completed in 1857. The cemetery design incorporated some of the original features of the Stoney Royd estate. (The estate dating from c.1764).</p> <p>The proposed development site is not on the boundary of the registered cemetery and is separated from it by a belt of trees/scrubland. The proposal is at the end of a terrace, with other cottages nearby, so provided matching building materials are used it should blend with existing development.</p> <p>We do not consider that the proposed development will cause harm to the registered cemetery and have no objection.</p> <p>Yours sincerely, Val Hepworth Chairman Cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust</p>
Leeds Local Plan	West Yorkshire	E18/1652	n/a	LOCAL PLAN Leeds Site Allocation Plan Consultation on proposed Main Modifications	<p><b>CGT WRITTEN RESPONSE 21.02.2019</b></p> <p>The Gardens Trust (GT) is the statutory consultee regarding proposed development affecting a site on the Historic England Register of Historic Parks and Gardens. 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>Following the note issued to Leeds CC by the Government Inspectors directing that Main Modifications (MM) will be necessary to delete the Parlington site MX2-39 from the SAP, I am writing on behalf of the Yorkshire Gardens Trust and the Gardens Trust to support the relevant MMs and the deletion of the site.</p> <p>We note that the reasons given by the Inspectors for deleting the site from the current SAP are mainly pragmatic, viz.</p> <ul style="list-style-type: none"> <li>• the revised/reduced housing numbers</li> <li>• the rejection of the notion of Broad Locations</li> <li>• the rejection of phased development plans</li> <li>• the need to get houses built within the coming 5 years</li> </ul> <p>We also note that these early comments do not include any reference to Parlington as a heritage asset, by virtue of its designations:</p> <p>A historic designed landscape - the Historic England Register of Historic Parks and Gardens, Grade II, added 2017.</p> <p>Its built structures on the HE National Heritage List for England:</p> <ul style="list-style-type: none"> <li>• Triumphal Arch (II*)</li> </ul>

					<ul style="list-style-type: none"> <li>• 3 buildings at Grade II</li> <li>• additional 7 structures at Grade II, added 2018</li> </ul> <p>We hope that in their final report the Inspectors will take due consideration of the site as a heritage asset, and recommend Parlington's continued exclusion from any subsequent plans that Leeds CC may draw up for post-2023.</p> <p>We would be grateful to please be informed of further responses from the Inspectors and Leeds City Council.</p> <p>Yours sincerely,  Val Hepworth  Chairman  Cc. Neil Redfern, Ian Smith, Historic England; Margie Hoffnung, the Gardens Trust</p>
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