



CONSERVATION CASEWORK LOG NOTES OCTOBER 2020

The GT conservation team received 182 new cases for England and two for Wales in October, in addition to ongoing work on previously logged cases. Written responses were submitted by the GT and/or CGTs for the following cases. In addition to the responses below, 69 'No Comment' responses were lodged by the GT and/or CGTs.

SITE	COUNTY	GT REF	GRADE	PROPOSAL	WRITTEN RESPONSE
ENGLAND					
Planning for the Future		E20/0653		NATIONAL POLICY Consultation on proposals for reform of the planning system in England	<p>GT WRITTEN RESPONSE 28.10.2020 PLANNING FOR THE FUTURE</p> <p>1. The Gardens Trust</p> <p>1.1 The Gardens Trust (the Trust), as the statutory consultee for in excess of 1700 registered historic parks and gardens in England and Wales, plays a key conservation role in the heritage sector, actively monitoring and responding to planning proposals for development, strongly objecting to those which will have a detrimental impact on the significance of these valuable and irreplaceable heritage assets. The Trust supports sustainable future development and management that respects and illustrates a clear understanding of the significances of each place and embodies explicit conservation objectives and management of the unique qualities of each landscape so that these are preserved for future generations.</p> <p>1.2 This response is therefore submitted by the Gardens Trust, for itself and also on behalf of the affiliated County Gardens Trusts. All of the county trusts have been circulated with this submission in draft, and the responses received have been incorporated into this submission as appropriate. It is open to the individual County Gardens Trusts to make their own</p>

					<p>submissions if they so wish.</p> <p>2. This response</p> <p>2.1 The Trust very much welcomes the opportunity to engage in this consultation process and to draw attention to the role of the Trust in the planning process. The Trust took part in the meeting with the Secretary of State on 29 September 2020 which discussed heritage issues, and noted that there is a strong commitment for the sector to have a clear role within any reformed planning system.</p> <p>2.2 Under current legislation, local planning authorities are required to consult the Trust in relation to any development likely to affect registered parks and gardens or their settings before granting planning permission. It is noted that there is no specific reference in the White Paper to the role of statutory consultees in this fundamental reform of the planning system. In reviewing the Proposals and responding to Questions, the Trust therefore seeks to emphasise the valuable nature of its critical role in conserving and enhancing historic parks and gardens in the 21st century and raise questions as to when and how it may continue to be consulted at a timely and effective point in the planning process as this is embodied in new plan-making</p> <p>2.3 The Trust, and its predecessor organisations, has often made representations and responses to government consultations, and it has been usual for these responses to be confined to the specific interests of the Trust within the heritage field. This consultation is very different, in that it proposes changes to the system of planning that has been in place for most peoples' lifetimes. On this occasion therefore the Trust considers it appropriate to widen its response to cover some of the fundamental changes that are now proposed. To respond solely on specific heritage issues does seem to the Trust, on this occasion, to miss fundamental issues that require comment.</p> <p>3. The overall basis for change: the democratic process in Local Plan formation</p> <p>3.1 Planning for the Future begins by setting out 5 overarching principles 'to revolutionise' the whole way in which planning works in England. The primary function of the Trust lies within the heritage sector, and its close working relationship with planning authorities and extensive experience of the heritage consultation process places it in a unique position to comment more generally on the proposed primary legislation.</p> <p>3.2 The Trust wholeheartedly supports the desire that local councils should</p>
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					<p>or have access to an Historic Environment Record (HER) , and to use it and other sources to inform their evidence base about the historic environment in the area. These records have largely been researched and recorded by County Gardens Trusts. However, there is no overall coverage of HERs and their quality is variable. It is equally important that planning authorities should maintain their own list of national and locally listed assets, and that this resource should be acknowledged.</p> <p>4.7 There are a number of other proposals in the White Paper, which do not impact on the Trust’s core interest, but which have the potential to impact on the way that the Trust and the affiliated County Garden Trusts operate. These are addressed in the order in which they appear in the White Paper.</p> <p>Proposal 2: Development management policies established at national scale and an altered role for Local Plans.</p> <p>Question 6: Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? NO</p> <p>4.8 It is inevitable that any standards at national level by necessity will be broad-brush: it is very doubtful if any proper site constraint analysis can be achieved in this time. For the Trust, the compilation of more local policies will therefore be vital and the Trust suggests that the legislation should embolden the existing duty set out in NPPF policy to include a requirement that ‘a positive strategy for the conservation and enjoyment of the historic environment should be shaped by early, proportionate and effective engagement between planmakers ... and statutory consultees’. The White Paper states that local policies will be crucial too, but this will only be possible with appropriate planning authority staff and resources. Again, can this be accomplished at local level within a timescale of 30 months including public involvement?</p> <p>4.9 The White Paper proposes a ‘machine-readable format’ for policies, which runs a real risk of algorithmic policy creation. The alternative of allowing planning authorities to create their own local policies that sit below the national development management framework would appear to be a far more acceptable and practical solution.</p> <p>4.10 However, the key issue for the Trust, and for many other heritage bodies, is the very considerable burden that this will place on them in working with planning authorities at this stage. It is one thing to deal with planning applications, but it will be a much more complex and time-</p>
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					<p>consuming exercise to interact with the plan-making process as well.</p> <p>Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development.....</p> <p>Question 9(a): Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent? NO</p> <p>4.11 The requirement that an outline planning permission be sought for land that is allocated in a Local Plan has always been subject to some criticism. However, it is vital that all of the issues that fall to be considered for the land in question are properly assessed before conclusions are drawn about its suitability for development. While these issues could be identified within the Local Plan for each Growth area, this departs from the current system where the onus is on the developer to carry out the assessment in the context of specific planning proposals. If the assessment is one of many carried out by the planning authority as part of the shortened Local Plan timescale it is unlikely to have the same depth of research and analysis and will be a less robust appraisal of the acceptability of the proposed development.</p> <p>4.12 To grant automatic outline planning permission on the basis of land being within a Growth area therefore requires a sound and robust evidence base. The Government’s proposals also rely on a proper level of funding. Without serious funding and more professional planning officers it will be quite beyond the ability of planning authorities to carry out the necessary assessment, let alone within the timescale implied by the 30-month limit. There is a real danger that planning authorities will simply accept evidence bases supplied by developers in support of their proposals, which will all too easily have questionable bias. The general public and the voluntary sector will never be in a position to challenge this with their own resources.</p> <p>4.13 It is vital for the Trust that, among all of the other issues, heritage assets must have an adequate level of safeguarding within the Local Plan and outline approval process. This is not always the case at present, and would be at even greater risk with the proposed changes.</p> <p>4.14 The Trust is also concerned at the proposal to establish whether ‘experienced architectural specialists’ can be given ‘autonomy’ from securing listed building consents. This is a dangerous proposal: whenever professional integrity is linked to commercial activity there can be</p>
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					<p>difficulty. If a specialist is good, then there should be no difficulty in submitting a sound application and securing approval quickly. Also, if this was to apply to architects and listed buildings, it is inevitable that the principle will be used with other professions.</p> <p>Question 9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? NO</p> <p>4.15 It follows from what has been said above that there should be no change to the existing processes for these areas. Where some assessment is needed, then the constraints can be set out in the Local Plan for the areas in question, but planning permission should have to be sought as it is now. It is important that Protected areas have a level of local policy-making incorporated. In rural areas - the majority of the country - the impact of even small developments can have a serious impact. This is of particular importance to Heritage groups, including the Trust, in that many of the sites concerned are in rural settings, and where heritage assets can be compromised by even a small development. There can also be a danger of adverse cumulative impact over time.</p> <p>Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology</p> <p>Question 10. Do you agree with our proposals to make decision-making faster and more certain? NOT NECESSARILY</p> <p>4.16 This question suggests that all planning applications have similar or identical issues. Lack of resources, and lack of trained staff, means that a deadline is a quick route to poor decision making.</p> <p>A basic deadline is of course acceptable, just as there is now, but there has to be a clear ability for a longer time to be taken where necessary. This is particularly the case with large and complex applications, such as will be submitted in Growth areas where outline approval is not needed, to allow for the detailed issues to be dealt with responsibly. The Trust's experience is that, with limited heritage expertise now in local planning authorities, particularly relating to historic landscape, parks and gardens, the appropriate consultees are frequently not approached and often their views are not given appropriate weight in the decision making process.</p> <p>Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools</p> <p>Question 13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? YES</p>
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					<p>Question 13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?</p> <p>4.17 The Trust believes that Neighbourhood Plans have proved themselves to be a valuable tool for the creation of policies at a local level. While they must inevitably take their lead from national and local authority level policies, there is much that can be said at parish or similar level to pick up on strictly local issues that have no place in higher level statements. They are also valuable to the Heritage sector in picking up on local heritage assets, as identified in the NPPF. They should continue, with the same level of support from planning authorities that they have now.</p> <p>Pillar Two - Planning for Beautiful and Sustainable Spaces (Proposals 16 and 17 are of relevance for the Trust).</p> <p>4.18 The Trust's primary concern is the conserving and enhancing of historic areas. This is referred to in Proposal 17, which in the Trust's view links to Proposal 16.</p> <p>Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.</p> <p>Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century.</p> <p>4.19 The Trust places these two proposals together, as they are closely linked. The Trust's clear view (on Proposal 17) is that historic areas - heritage assets in terms of the NPPF – should continue to be conserved and where possible enhanced. Parks and Gardens of importance are designated by Historic England at Grade I, II* or II, but these areas do not have the same statutory protection as listed buildings. Specific reference to historic parks and gardens rather than a generic reference to 'areas' will enhance their importance.</p> <p>4.20 Importantly, historic buildings and areas, which include historic parks and gardens as heritage assets, benefit from their setting which forms part of the borrowed landscape surrounding them, and contribute (often very importantly) to their importance and value within the landscape. Recent legal decisions on 'setting' have created a number of precedents, not always complementary. A review of setting in terms of Historic England advice and hence part of the framework proposed here would be a welcome step.</p>
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					<p>culture change, improves recruitment and changes perceptions of planning'. In addition, other key players, including the Planning Inspectorate and statutory consultees, will have to transform the way they operate in response to these reforms, given their critical role supporting the preparation of Local Plans and decision-making. They too will need to be more responsive and outward looking, and have the necessary skills and resources to undertake their new roles."The Planning Inspectorate and statutory consultees should become more self-financing through new charging mechanisms and be subject to new performance targets to improve their performance.</p> <p>5.2 These are key paragraphs. However, many statutory consultees are not-for-profit organisations without paid staff. This Trust is a charity with limited resources, which relies on wide-spread support from volunteers - albeit with relevant expertise and experience – to fulfil its statutory duties. Historic England funding in recent years has supported a programme to develop the capacity of County Gardens Trusts to enable them to engage more pro-actively, but this funding has been reduced over recent years. The key area for this work has been in responding to planning applications. If the emphasis changes from applications to Local Plans, then this will present voluntary organisations with real difficulty.</p> <p>5.3 The Trust also notes the statements concerning judicial review. It must be right that it should remain in those cases where there have been errors in decision-making. Clearer policies could make the use of judicial review less likely, but if the policies in question are more broad-brush this might easily give rise to more challenges on the basis that local factors have not been taken into account. Finding the optimal balance between broad-brush national policies and more precise local ones will always be difficult to achieve.</p> <p>5.4 Finally however, the Trust is not convinced from the outset that the proposed major changes to the planning system are necessary in order to deliver what is proposed. If the key reason for the changes is to deliver more housing, then it is certainly not necessary for that. What is needed is -</p> <ul style="list-style-type: none"> * a fundamental assessment of the way that the existing system works, * appropriate changes to that system, * ensuring that the resources are allocated to local government to allow it to function properly, and
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				<p>* a greater recognition of the planning system in the economy of the nation. Change in itself will achieve nothing, unless these factors are acted upon. If not, the new proposed system will be no better - and arguably worse - than what it replaces. The Gardens Trust</p> <p>CGT WRITTEN RESPONSE 20.10.20 (STAFFORDSHIRE) Staffordshire Gardens and Parks Trust is a registered charity whose objectives are to promote research into, understanding and conservation of historic designed landscapes in Staffordshire (defined by its historic pre 1964 boundaries to include the present Black Country boroughs of Sandwell, Walsall, Wolverhampton and parts of Dudley). The Trust agrees that current planning legislation and procedures have become complex, confusing and time consuming and would benefit from reform. The Trust does not consider that the White Paper adequately addresses these shortcomings and in particular proposes to leave the miasma of de-regulatory permitted development rights, prior notifications etc introduced under secondary instruments unchanged. The latter are often the most confusing rules to understand and, with their lack of public or local authority scrutiny, the cause of many unsatisfactory developments. If reform is to be effective it should encompass the whole gamut of planning law and procedures. In relation to the White Paper the Trust is opposed to the proposed streamlined Local Plan process and to the classification of land as Growth, Renewal, or Protected. A shortened Local Plan timetable will not allow adequate opportunity to assess the environmental implications of proposed site allocations or for these to be subjected to third party scrutiny. Conferring outline planning permission status on site allocations without the opportunity to challenge the underlying environmental assumptions risks causing irreparable harm to heritage and natural environment assets or their settings. The Trust objects to the proposed broad categorisation of land into three zones as crude and simplistic. It fails to recognise that areas of heritage significance whether designated or otherwise are uniformly distributed across the country and will not fall exclusively in "Protected" zones or that the interest of any heritage asset is confined within an arbitrary boundary.</p>
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					<p>of the White Paper. The Trust objects to the principal changes to legislation set out in the consultation, regrets that heritage issues are not currently included and that historic parks and gardens are not discussed. Staffordshire Gardens and Parks Trust suggest in conclusion that the proposal set out in the consultation document should be fundamentally reconsidered.</p> <p>Your faithfully Alan Taylor Chairman</p> <p>CGT WRITTEN RESPONSE 29.10.2020 (YORKSHIRE)</p> <p>We are grateful for the opportunity to contribute to the important topic of planning reform. In making our response we wish to endorse the response by our sister charity, The Gardens Trust, to emphasise and amplify the points in The Gardens Trust's response, and to make some additional points that are important in our experience with planning in Yorkshire.</p> <p>1. The white paper does not appear to acknowledge that without properly resourced planning departments effective and sustainable planning is not possible, so that any reform will be tinkering at the edges of a national problem. In our county there are 126 registered parks and gardens, one of which, Studley Royal, has World Heritage site status. Planning departments in Yorkshire require expertise in the particular challenges of working with these landscapes, but planning authorities throughout Yorkshire are understaffed, and lack appropriate expertise to deal with sensitive and complicated matters in relation to designed landscapes, parks and gardens. Thus, many planning authorities in Yorkshire either do not have a conservation officer, or have just one officer working part-time.</p> <p>2. The current system of registration for designed landscapes, parks and gardens does little more than recognise their importance; unlike the system for listed buildings, there is no statutory protection for these landscapes. We can see nothing in the white paper to address this anomalous and deplorable position.</p> <p>3. Wellbeing, climate change, biodiversity and sustainability are critical considerations for our nation in the short and long term. Unless our designed landscapes, parks and gardens, and access to them, are protected, the effectiveness of designed landscapes, parks and gardens will diminish and decay. They are relatively inexpensive to maintain and improve, but easy to damage. The white paper should place more</p>
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					<p>emphasis on these aspects of planning, and acknowledge that expert planning resources, locally based, are required to realise the potential of these landscapes.</p> <p>4. The proposition to assign land to the three groupings is seriously flawed. The beauty of the UK landscape and its towns is ineluctably connected to variety and difference. The mosaic of gardens, buildings, streets and parks that has developed over centuries is an immensely precious asset that brings joy to our lives and visitors to our shores; in our county, York is a world-famous example of how successful and attractive such a mosaic is – but we do not wish it to be fossilised. Its preservation and enhancement depend on local knowledge and engagement developed and sustained over time; the present proposals to create groups or area designations will prevent the mosaic from growing and changing sensitively and appropriately, carrying a high risk of creating areas that are doomed to be preserved as museums rather than living, breathing, growing places that people care for and wish to live in and visit. There is a closely related danger that ill-considered developments, even small ones, will gradually erode on a cumulative basis the precious qualities of our parks, gardens and green spaces.</p> <p>5. We understand that the white paper provides for Protected Areas (including established designations such as green belt, AONB, conservation areas) to remain subject to existing policy considerations. But these occupy a small part of the country, while many historic parks and gardens do not lie in Protected Areas. It is important that fast-tracking is not applied to designed landscapes, parks and gardens wherever they might be in the proposed areas; and that individual assessments of applications affecting designed landscapes, parks and gardens are maintained and improved.</p> <p>6. The question of boundaries between these proposed areas is not properly explored. Boundaries for designed landscapes, parks and gardens are critical to their appreciation and value; it must be recognised that the wider setting and broad visual envelope of such landscapes are important factors in their design, which contribute immeasurably to the many ways in which they are enjoyed now, and in the future. Area designations must allow the consideration of hard and soft boundaries, where parks might blend into agricultural landscapes, or urban or semi-urban settlements. The success of boundaries depends on individual assessments, and cannot possibly be achieved within the proposed timescale for designating the three areas. Moreover, if the white paper is to be successful in improving</p>
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					<p>the planning system, it needs to recognise the importance of, and provide for, change over time. It must also acknowledge that new knowledge and new appreciation of landscapes are acts of continuous creation, as in the very recent additions to the Listings of twenty significant Post-War Landscapes in England.</p> <p>7. The proposal to allow designated experts to judge their own work is dangerous. Handing over decisions without scrutiny to experts who might not understand local significance (or, indeed, national significance) will lead to poor design and inappropriate intervention. Moreover, it threatens to undermine and ignore the considerable amateur expertise in the population at large (built up over long periods with much effort and expense), and not least in public benefit charities such as our own. Co-creation, pre-application co-operation and neighbourly discussion have good records in creating designs that are owned and appreciated by the public. It is wrongheaded to consider this process as delay; it is rather a process that increases the likelihood of getting designs right, and therefore sustainable into the future. It is important that the new system adopts a plurality of ways (including physical signs) to alert people to applications for planning permission.</p> <p>8. Yorkshire's National Parks require special consideration and support in planning matters relating to designed landscapes, parks and gardens. Yorkshire Gardens Trust has assisted our National Parks through our research and recording programme (run, led and financed at no cost to the public purse), which has enhanced their understanding of the historic parks and gardens within their boundaries. We also advise on planning matters that affect historic parks and gardens in these National Parks. We are concerned that the white paper pays insufficient regard to the particular problems of these special areas. In particular, we fear that National Parks could lose control over where properties are built, and that this will have a damaging affect on the character of the Parks themselves, and on historic parks and gardens and their settings.</p> <p>9. Beauty is an elusive and evanescent characteristic to deploy as a planning tool. It carries with it a high risk of privileging sight over the other senses (it is folly to ignore scent, touch and hearing in connection with gardens), and over other characteristics (including, among others, association with historical events or figures, intellectual rigour, and significance in demonstrating new ways of approaching, appreciating and designing landscapes). Beauty is also highly subjective and changes over</p>
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				<p>time, even so short a time as a generation, let alone over centuries.</p> <p>10. Detail – whether it be a planting scheme in a single bed or the material chosen for a path or a structure – is critical to the big picture. Mosaics of landscape and townscape are constructed of individual tesserae, all of which need to be understood and approached with care; that cannot be achieved in a lasting way in a single 30-month period.</p> <p>11. We do not wish to oppose reform of the planning system root and branch; there are improvements that can be made, and we understand and support the drive to build homes. But wholesale reform over so short a period is doomed to failure if it does not carry with it the need to enhance local engagement in the development and growth of local areas. We urge, therefore, a more considered approach, which is less driven by theory and more by data, by practical appreciation of what there is to be gained, and what there is to be lost.</p> <p>12. We are pleased to note that the white paper acknowledges that street trees are to be an important feature of future planning, as exemplified by the success and importance of the community-led campaign in Sheffield to prevent the City Council from removing healthy trees from its streets. We also note that the creation of new parks and green spaces will be important to health, wellbeing and the public realm in developments in town and city centres, and that, as with trees, future planning processes should be clear on this point.</p> <p>13. We support the proposal that each planning authority will have a chief officer for design and place-making. In that connection, we support the proposal that design codes should ‘be prepared locally and ... be based on genuine community involvement rather than meaningless consultation’.</p> <p>Contact information Chris Webb, Chair, Yorkshire Gardens Trust</p> <p>CGT WRITTEN RESPONSE 29.10.2020 (LONDON) The London Gardens Trust (LGT) formerly known as the London Parks & Gardens Trust 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 (English Heritage) Register of Parks and Gardens of Special Historic Interest. Inclusion of a site in the HE Register is a material consideration in determining a planning application. The LPGT is the</p>
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					<p>gardens trust for Greater London and makes observations in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the LPGT's Inventory of Historic Spaces (see https://londongardenstrust.org/conservation/inventory/) and/or when included in the Greater London Historic Environment Register (GLHER).</p> <p>As an affiliate of the Gardens Trust, we support their formal response to this consultation and the erudite submission from the Joint Committee of the National Amenity Societies. We would however wish to emphasise and add a few points in relation to London and its suburbs;</p> <p>1. Three categories are too coarse to capture the variety of the historic characteristics of London and Greater London -</p> <p>Your three proposed categories hold their own differing threats to heritage and historic designed landscapes in particular. London is already a densely populated area, with contemporary and historic sitting cheek by jowl. The idea that boroughs can be divided into just three different 'pillars', and for most permissions to be given in advance, will lead to a loss of this urban grain. Blanket protections are likely to have an ossifying effect on the exciting variety of character of historic London and the small villages and country estates which have coalesced to become Greater London. Or even worse, blanket designations for growth could lead to the complete loss of that historic character.</p> <p>2. Who will pay for the front loading of this intense research, design and consultation? -</p> <p>The time and skills required to prepare design codes are expensive and money and staff time. Most boroughs have now got their Local Plans in place – it does not make sense to throw them out. The level of further design required to work up acceptable codes from what you suggest are wordy, detailed plans, demonstrates the inherent problem with developing design codes. They are not simpler to produce if you are truly basing them on local unique character.</p> <p>3. Local planning authorities having to take on this front-loaded work could equate to local communities subsidising speculative development by taking on the detailed research which is currently the duty of developers and presently rightly impacts on their viability tests.</p> <p>4. Lessons should be learnt from the failure of local listed building consent orders & heritage partnership agreements under the 2012 Enterprise and</p>
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					<p>Regulatory Reform Act. - These orders are exceedingly rare in historic areas and the reasons why so few have been taken forward are equally relevant to your present proposals. There are three main reasons why blanket consents in historic areas have not worked, i) the cost of the formulation of the area plans and what are in effect design codes some of which will be rarely used, ii) the blunt instrument of design codes usually leads to the loss of complexity and 'quirkiness' which is a trademark of historic buildings and designed landscapes iii) New applicants challenge the codes anyway.</p> <p>5. The cumulative impact of sites being developed across London – How will the cumulative impact of change or loss be reflected in subsequent applications/changes as remaining parks, gardens and green spaces becoming ever more rare and precious.? Will we retain a Londonwide overview?</p> <p>Although we appreciate the government wants to streamline the planning process, the approach outlined in this white paper would seem to propose a rather blunt instrument which could damage the present character of London and its historic designed landscapes.</p> <p>If the aim is to increase the building of housing, then many sites in London have planning permissions already yet remain empty, or subject to serial applications as the site changes hands. Perhaps a tax, applied to sites with planning approval if they have not been built-out after two years, might ensure the delivery of more housing and more quickly since the approvals are already in place.</p> <p>Finally, although not an issue relating only to London, pockets of deprivation mean that the digital online approach to planning will be discriminatory if access to broadband and computers is not made available to the majority of people. Not everyone has a smartphone and notices on lamp posts are often a very useful means of contacting local people. London has many spectacular designed landscapes, but it is also important to recognise the huge importance of its wider green legacy or historic designed landscapes which includes the treelined avenues, landscaped housing estates, small pocket parks, riverbanks, woods, cemeteries, green belt farm estates & country houses, airfields and private gardens etc. Your proposals still need to consider how they can be protected and enhanced rather than forcing local authorities to sell them or give blanket consents for major development.</p> <p>We hope our comments have alerted you to some of the problems</p>
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					<p>inherent in your proposals and we look forward to further iterations and opportunities to input our experience of historic designed landscapes in London.</p> <p>Yours Sincerely, Rose Wakelin Planning Conservation Project Officer For and on behalf of the Planning & Conservation Working Group</p>
Ashton Court	Avon	E20/0318	II*	<p>PLANNING APPLICATION Proposed change of use from training centre (Use Class D1) to touring caravan site (Use Class D2), consisting of 62 pitches and associated buildings and works. Police Dog And Horse Training Centre, Clanage Road, Bristol BS3 2JY. CAMPING</p>	<p>GT WRITTEN RESPONSE 05.10.2020</p> <p>Further to our response dated 23rd June 2020, we have noted the contributions from other statutory consultees and the subsequent response notes from Rapleys LLP. The Gardens Trust and also Avon Gardens Trust, are still of the opinion that the proposed development would affect not only the extensive Green Belt area, but in our opinion, cause unjustified harm to the nationally-significant, Grade II* Registered Ashton Court Park and Garden, the setting of the Grade I registered Ashton Court mansion and stables, the Avon Gorge, the Grade I Clifton Suspension Bridge as well as the setting of two local historic parks and gardens, Greville Smyth Park and Bower Ashton. Our colleagues in the AGT know the site well and their local knowledge informs this joint response.</p> <p>In an attempt to progress to a solution that does not ignore Flood Risk warnings and the status of Registered Parks and Gardens, we have studied the site selection process which started in 2014.</p> <p>That study produced 59 possible sites. According to the spreadsheet submitted, three sites are no longer available.</p> <p>Of the 56 remaining sites; 34 were classed as DM 58 sites which means that they were within the Greenbelt, so were removed from the list and no further consultation was attempted.</p> <p>Out of the 22 remaining sites, the reason for not investigating their possibilities is/was “We have not had sight of the official policy guidance relating to caravans and campsites’ but have assumed that this use on undeveloped Greenbelt land would not be permitted by the local authority”.</p> <p>Incidentally, given that Clanage Road site is in a Zone 3 Flood Risk area, it is still, against expert opinion, being pursued as the preferred site option by your good self, on behalf of the Caravan Club. Fifty of the original list of 59 sites are all in ‘low flood risk’ areas. Furthermore, of the 5 sites identified by the Caravan Club in 2014 for developing, only one was in a low flood risk area.</p>

					<p>By 2018, the search for a site was narrowed to 10 sites, 8 were dismissed because it was assumed that: “use on undeveloped Greenbelt land would not be permitted by the Local Authority”. One site in Greville Smyth Park; not in Greenbelt; not part of the Joint Spatial Plan; and was a Low Flood risk area, was dropped from the search with no explanation.</p> <p>By 2019, three ‘Site Options’ were identified by JLL. The only one with a High Flood risk was taken forward. That is the present Clange road site. The Gardens Trust and Avon Gardens Trust consider that three things could be done to progress matters.</p> <ol style="list-style-type: none"> 1. Respectfully remind the applicants of what the significance of a Grade II* Registered Park and garden means. 2. Ask for proper photomontage images of the two examples submitted: Visualisation type 1 – showed no montage of proposed buildings and caravans. <p>Also, photo 26, view from Princes Lane towards the site is a ‘site location’ photo, not a photo montage indicating the height and breadth 3D image of the proposed buildings and caravans, planned for the site.</p> <p>Incidentally, “For the benefit of this report, the assessment of visual impact is based on the assumption of approx. 50% pitch occupancy”. Local comment suggests the Spike Island site is closer to 100% occupancy.</p> <ol style="list-style-type: none"> 3. We would also suggest that the applicant researches the Greenbelt Policy changes that have recently occurred and suggest a new site search which would avoid Registered Parks and Gardens and High Flood Risk areas. <p>Ashton Court is unusual in celebrating its relationship with Bristol in terms of views over the city as the Smyths wanted to embrace the view from their estate over the city that supported their wealth. Most landowners/estates at the time were much more concerned with privacy and containing/controlling their views. In addition the wonderful ‘wedge’ of green (mainly trees, but also open fields/parkland) from the Suspension Bridge down to the river on the west of the gorge, is part of the setting and iconic arrival views of Bristol itself, with the Clifton terraces on the opposite side.</p> <p>In summary, the GT/AGT strongly OBJECT to the proposed change of use to a touring caravan site of 62 pitches with associated buildings and works. We respectfully encourage the applicants to revisit their search for a suitable site that does not harm the Grade II* Registered Park and Garden.</p> <p>Yours sincerely,</p>
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					Margie Hoffnung Conservation Officer
Central and Eastern Berkshire Joint Minerals and Waste Plan	Berkshire	E20/0739	n/a	LOCAL PLAN Proposed Submission consultation	CGT WRITTEN RESPONSE 06.10.2020 The objectives support protecting the historic environment. We support the approach taken in Section 2 of the Policy in particular - see comments on DM7 On behalf of the Berkshire Gardens Trust and the national Gardens Trust, I submit our objections to the current wording of DM7. The Heritage Statement by HCC suggests revised and improved wording on page 46 which we fully endorse We believe that the policy should include a requirement to record assets to be lost and the recording to be deposited in a public archive A single reference to mitigation in the text (para 5.72) only refers to archaeology. The requirement for mitigation extends to all of the historic environment including built and landscape assets, which are equally important. DM5 the policy item 2 (page 39) includes positive action to mitigate the harm to the countryside. Similar wording should have been included under DM7 to meet the requirements of NPPF para 185. Policy to be reworded in accordance with the Heritage Statement by HCC: We support the inclusion of 2 d) which includes the historic setting We support the above choices which avoid any impacts on historic parks and gardens. Bettina Kirkham Chair Berkshire Gardens Trust
Stoke Park	Buckinghamshire	E20/0912	II	PLANNING APPLICATION Construction of Security Gatehouse, entrance gates, re-aligned driveway and estate fencing. Stoke Park Ltd, Stoke Park House, Park Road, Stoke Poges, Buckinghamshire. ACCESS/GATES	GT WRITTEN RESPONSE 14.10.2020 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. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and their local knowledge informs this response. The GT/BGT warmly welcome these revised proposals. Careful consideration has clearly been given to the impact upon the Registered Park and Garden (RPG). We note that the following changes are being proposed :

					<ul style="list-style-type: none"> • to relocate the proposed new security hut to the other side of the main entrance to be constructed in like-for-like materials with a flat roof to minimise its impact • new vehicular and pedestrian gates in 1.2m black park railing style and a central island for security staff to greet vehicles. • to realign the road away from the historic lodge and proposed new security hut. • to remove the existing painted timber entrance signs and replace them with brick and stone carved entrance signs set further back so as not to obscure views into and out of the park. <p>Whilst we have no comment on the first 3 items, the fourth, the brick and stone entrance signs are not historically appropriate for the entrance to this C18/C19 landscape park. We do not object to signs per se as they are necessary, but the proposed style and materials damage the historic character of this key entrance. We ask the local authority to require a revised, less structural, scheme that makes a more elegant contribution in keeping with the historic character. The existing signs are less damaging to the historic character and fabric.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Langley Park	Buckinghamshire	E20/0948	II	PLANNING APPLICATION Two storey front extension, part single/part two storey side and rear extensions and internal alterations. Park Stile, Love Hill Lane, Iver, Buckinghamshire, SL3 6DE. BUILDING ALTERATION	<p>GT WRITTEN RESPONSE 26.10.2020</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. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and their local knowledge informs this response.</p> <p>The property stands in the setting of the Grade II Langley Park Registered Park and Garden (RPG), just outside the south east corner. This position in the immediate setting of the RPG means that the effect of alterations is potentially considerably damaging on this particularly sensitive area. Whilst there appear to be trees which might block some of the view from the RPG, should these trees be removed or pruned, the property would be visible from the parkland and listed structures. Therefore, it is necessary to assess these proposals within the wider context of Langley Park. In a recent decision (APP/D3505/W/19/3230839) a planning inspector emphasised that limited reliance should be placed on the ability of planting to screen</p>

					<p>views of developments, given the variability of such planting. In order to fulfil even a partial screening role, trees and associated dense undergrowth must be managed and maintained permanently by the long-term implementation of a management plan. Substantial aggrandisement of a prominent house right on the edge of the RPG, even if filtered to some degree, if visible from within the RPG, in our opinion would negatively affect its significance.</p> <p>The GT/BGT note that the structure originated as a farmhouse but has been gentrified over the years to create the appearance of a small country manor house. Many of these changes have resulted in the loss of historic fabric and more recent changes have proved even more detrimental to the character and appearance of the property.</p> <p>Nonetheless, the GT/BGT feel strongly that they would prefer to see proposals that sought to reinstate the architectural style and appearance of a gentrified farmhouse, which could still achieve the desired living accommodation whilst being more sympathetic to the landscape setting and character of the application site.</p> <p>We have not been able to undertake a site visit, so it is difficult to assess what will be visible from the RPG & Park Stile Lodge. However, the GT/BGT object to the enlarged portico, excessive glazing in different fenestration patterns and wrap-around glazed balconies. In our opinion, the roof in its current form creates too great a mass and we feel it would be better to break up the roof form to mitigate the impact in close and long views from the park.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Dropmore	Buckinghamshire	E20/0993	II	<p>PLANNING APPLICATION Construction of a replacement irrigation tank and pump house for golf course irrigation. The Lambourne Club, Dropmore Road, Burnham, Buckinghamshire, SL1 8NF. GOLF, MAINTENANCE/STORAGE/OUTBUILDING</p>	<p>GT WRITTEN RESPONSE 21.10.2020</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. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and their local knowledge informs this response.</p> <p>We have studied the online documentation and it is clear that the irrigation tank is in close proximity to other golf club maintenance structures. These in themselves are already damaging to the Grade II registered park at Dropmore, and the replacement irrigation tank is a large structure. We</p>

					would therefore ask whether it is possible to sink the tank into the ground completely, or even partially? This would be our preference. If this is not possible for technical reasons, we would ask that your officers condition any consent by requesting additional planting to minimise the impact of the new structure. Yours sincerely, Margie Hoffnung Conservation Officer
Latimer Park	Buckinghamshire	E20/0995	II	PLANNING APPLICATION Erection of new outbuilding, outdoor swimming pool and associated landscaping works. Parkfield House, Church Lane, Latimer, Buckinghamshire, HP5 1UG. SPORT/LEISURE, MAINTENANCE/STORAGE/OUTBUILDING	GT WRITTEN RESPONSE 21.10.2020 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. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and their local knowledge informs this response. We have studied the online documentation and note that although the existing tree planting dates from the 1970s we would regret the loss of most of the evidence of the former orchard here as it echoes the historic use of the site. However, if your officers are minded to approve the application, the GT/BGT do not offer any objection. Yours sincerely, Margie Hoffnung Conservation Officer
Tatton Park	Cheshire	E18/1020	II*	PLANNING APPLICATION Reserved matters application pursuant to outline planning consent 13/2935M for siting, design, appearance and landscaping details for residential development (C3 Use Class). LAND NORTH OF PARKGATE INDUSTRIAL ESTATE, PARKGATE LANE, KNUTSFORD, CHESHIRE. RESIDENTIAL	GT WRITTEN RESPONSE 28.10.2020 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. We have liaised with our colleagues in the Cheshire Gardens Trust (CGT) who have met with the developer and their planning consultants on two occasions, once on site, and their local knowledge informs this response. The application site abuts the Tatton Estate, a grade II* registered landscape (RPG). Humphry Repton produced a Red Book in 1791 and his implemented proposals included replacing the drive up the Broad Walk with one from an architecturally emphasised lodge at the Knutsford entrance, and planting the tree screen to conceal the stables, kitchen garden and service courtyard. He also recommended extending the two meres in the park and planting around them to give the impression of a

					<p>single sheet of water when viewed from the Hall. Joseph Paxton built a Fernery in the kitchen garden and possibly designed a pool on the lower terrace in the later 1850s which was eventually built in the early 1880s. Both Capability Brown and William Emes were in correspondence with the owner, Samuel Egerton in the 1750s and 1760s respectively, although no evidence of their work is evident within the RPG.</p> <p>The proposals show a green space between the proposed housing and the Tatton estate which contain some interesting features such as a community orchard and an eco zone. However, the GT/CGT are concerned about the minimal amount of new planting adjacent to the Tatton estate. This suggestion was made by Ed Bennis from the CGT at both his meetings with the developer and it is disappointing that this has not been incorporated within the amended plans.</p> <p>Section 2.25, Statement of Significance, states that 'there is the potential to glimpse views of the development from within the park and has been identified as an element which could potentially harm the significance of the asset'. This is will become a greater issue as the Shawheath Plantation is managed and thinned, thus opening up views of the housing.</p> <p>We would strongly recommend that a buffer barrier is created across the entire north/north-west boundary, similar to the proposed buffer zone that runs along the entire south/south-east boundary, to mitigate the visual impact. This buffer zone would reinforce existing planting and should contain vegetation that would deter trespass onto the Tatton Estate landscape.</p> <p>The GT/CGT would like to see full detailed planting and management plans prior to any approval. This should be supported with selected scaled x-sections to demonstrate how the visual impact can be mitigated.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Heligan	Cornwall	E20/0554	II	PLANNING APPLICATION Use of land to station portacabins to provide ducation/demonstration and office facilities. The Lost Gardens Of Heligan, Road From Heligan Gardens Entrance To Heligan	<p>GT WRITTEN RESPONSE 22.10.2020</p> <p>Thank you for notifying us about the updated planting plans as part of the mitigation strategy to hide the newly erected portacabins. The holm oaks do provide a partial screen but we would also like to see some lower level hedging between the wooden fencing and the portacabins, to reduce visibility at lower levels. It is clear that the polytunnels visible in the aerial view have hedging all round them, so we would suggest something similar. We would appreciate seeing a detailed specification re planting : size,</p>

				Mill, Pentewan, St Austell. EDUCATION	spacing etc. We note that our original response dated 26th August is not on your planning portal. We would be grateful if you were please able to add this to the visible online documentation. I am attaching a copy so you do not need to look it up again. Yours sincerely, Margie Hoffnung Conservation Officer
Corby Castle	Cumbria	E19/0196	I	PLANNING APPLICATION Structural Works To Stabilise Embankment With Piles And Concrete Rafts; Construction Of Retaining Wall, Stone Steps, Coping And Estate Fencing (Part Retrospective) (LBC). Cascade Steps, Corby Castle, Great Corby, Carlisle CA8 4LR. LANDSCAPE, GARDEN	GT WRITTEN RESPONSE 18.10.2020 Stephen Daniel Esq Carlisle City Council18th 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. We have liaised with our colleagues in the Cumbria Gardens Trust (CGT) who made a site visit in 2019, and their local knowledge informs this response. It is clear from the documentation detailing the options for undoing the great damage done to the Grade I Cascade and the Grade I registered park at Corby, that the construction of these ill-judged steps have now compromised permanently the stability of the cliff face and it is not possible simply to remove them. It is suggested that the new steps were originally installed to counteract a perceived instability in the cliff face when the old wooden steps collapsed, but in our opinion, prior to their erection without planning consent, expert advice should at the very least have been sought from Historic England's structural engineer, to suggest a less intrusive and damaging solution. We are therefore left with no option but to agree to a sort of half way house of partial removal of the worst excrescences, and to hope that eventually planting of remedial vegetation will eventually soften this terribly misjudged endeavour. Yours sincerely, Margie Hoffnung Conservation Officer
Plympton House	Devon	E20/0999	II	LOCAL PLAN Proposed Designation of East Field, Plympton as a Local Green Space	CGT WRITTEN RESPONSE 16.10.2020 The National Planning Policy Framework published by the Department for Communities and Local Government provides communities with a means of protecting local green areas as a local green space. This enables communities to identify and protect areas that are of value to them

					<p>through local and neighbourhood plans.</p> <p>Local Green Spaces are designated by the local planning authority and once it is in place, it is subject to the same strong development restrictions as Green Belt, ruling out new development except in special circumstances. East Field Plympton fulfils the ‘particular circumstances’ that qualify a piece of land for Local Green Space Designation protection:</p> <p>The land is ‘reasonably close to the community it serves’.</p> <p>The land is ‘demonstrably special to a local community’.</p> <p>The land has particular local significance which is valued by the local community</p> <p>The land fulfils the following criteria:</p> <p>(a) Beauty</p> <p>East Field is visually attractive and contributes to landscape, character and setting of Plympton. As a Local Green Space, East Field contributes to the local identity, character of the area and a sense of place, and makes an important contribution to the physical form and layout of the settlement of Plympton. There are views through or beyond to the historic Plympton House which is highly valued locally.</p> <p>(b) Historic significance</p> <p>East Field adjoins the Grade I listed building and the Grade II Registered landscape of Plympton House. East Field contributes to the historic open green setting of Plympton House. The land allows views of the heritage assets of Plympton House which comprise the Grade I listed building set in a Grade II Registered landscape, together with the kitchen garden walls, the south wall along Long Cause and two pairs of gate piers, all listed Grade II.</p> <p>(c) Tranquility</p> <p>East Field provides an oasis of calm and a space for quiet reflection. The land is ‘local in character, not an extensive tract of land’.</p> <p>The Gardens Trust fully supports the application by the Plympton St Maurice Civic Association to designate East Field, Plympton as a Local Green Space</p> <p>Yours faithfully</p> <p>John Clark Conservation Officer</p>
Brighton and Hove Local Plan	East Sussex	E20/0751	n/a	LOCAL PLAN Public consultation on the Brighton and Hove City Plan Part Two	<p>CGT WRITTEN RESPONSE 29.10.2020</p> <p>Thank you for consulting the Sussex Gardens Trust (SGT) and also the Gardens Trust (GT) about the above Plan. The Gardens Trust is the</p>

					<p>statutory consultee on matters concerning registered parks and gardens, and is now working closely with County Garden Trusts such as SGT regarding commenting on planning policy and planning applications. The policies of interest to the Sussex Gardens Trust comprise the following</p> <p>Development</p> <p>Management Policies:</p> <p>DM28 - Local Heritage Assets,</p> <p>DM29 - the setting of heritage assets ,</p> <p>DM30 - historic parks and gardens, and</p> <p>DM32 - the Royal Pavilion Estate.</p> <p>Comments</p> <p>DM28 Locally Listed Heritage Assets. The Trust welcomes this policy. It is considered to give appropriate protection to possible future additions to the national register of historic parks and gardens.</p> <p>DM29 The Setting of Heritage Assets. The Trust would welcome the addition of 'height' to the development features listed.in the first paragraph ie alongside siting, footprint, density, scale etc. It has often been found to be the height of nearby developments that has had the greatest visual impact on garden settings. This is therefore considered a perverse omission.</p> <p>The Trust considers the wording of the last paragraph an over simplification, and objects to the way the policy seeks to prioritise heritage assets solely according to significance. If there is to be any prioritising, it should follow an assessment of both significance and impact, both positive and negative.</p> <p>DM30 Registered Parks and Gardens. The Trust would encourage changes in the wording of this policy for reasons of clarity. It recommends the second sentence be altered to begin ' In assessing the significance of the site and the impact of the development on the site's historic sense of place, it will also have regard to'</p> <p>The Trust does not believe that the second paragraph has a place within this policy. Such ' temporary' uses have a tendency to gain permanence and become the norm rather than the exception.</p> <p>DM32 The Royal Pavilion Estate. The Trust welcomes positive proactive action to manage the Royal Pavilion Estate, and recognises the challenges and pressures placed upon it. That said, the Trust considers this policy overly prescriptive with insufficient weight given to the sensitivity and significance of the existing layout and restoration work completed in the</p>
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					<p>late 20th C. The garden's historic interest is in part its use as a promenading garden, as a place for reflection and quiet enjoyment, and not for ever more intensive use(s). But that does not read loud and clear in the way this policy is worded.</p> <p>Conclusion</p> <p>For the above reasons the Trust has strong reservations over the way heritage policies DM29, 30 and 32 are worded; wording that dilutes their value as heritage planning policies. This the Trust finds unfortunate and asks that adjustments be made accordingly.</p> <p>Yours faithfully</p> <p>Jim Stockwell</p> <p>On behalf of the Sussex Gardens Trust.</p> <p>CC: The Gardens Trust</p>
Buxted Park	East Sussex	E20/0824	II*	<p>PLANNING APPLICATION C2 RESIDENTIAL CARE HOME. LAND EAST OF COOPERS GREEN ROAD, RINGLES CROSS, UCKFIELD. INSTITUTION</p>	<p>CGT WRITTEN RESPONSE 08.10.2020</p> <p>Sussex Gardens Trust (SGT) is a member of the Gardens Trust (GT) (a national statutory consultee), and works closely with the GT on planning matters; the GT has brought this application to the SGT's attention. Representatives of SGT have carefully reviewed the documentation submitted with this application. The site is located on land just beyond the boundary of Buxted Park, which is included on the list of registered Parks and Gardens maintained by Historic England with a Grade II* designation. The mansion, church and the main entrance avenue to the Park are located about 1Km from the development site and would be well screened by extensive woodland. Hence the proposals would not cause any harm on the significance of these parts of the Park. However, the proposals are very close to the western boundary close to Views Wood, which was included in the designated area because it was traversed obliquely by the route of the former double avenue of 'Scotch firs' (pines) planted in 1777 by John Curd and forming the main approach in the C19. Nevertheless, SGT does not object to the present planning application, but neither does it welcome the loss of this block of pasture land so close to the Registered area.</p> <p>Yours faithfully</p> <p>Jim Stockwell</p> <p>On behalf of the Sussex Gardens Trust.</p> <p>CC: The Gardens Trust</p>
Harlow Town Park	Essex	E20/0934	II	<p>PLANNING APPLICATION Indian Bean Tree - Fell. Land North Of 15</p>	<p>GT WRITTEN RESPONSE 29.10.2020</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</p>

				School Lane, Town Park, Park Lane, Harlow. TREES	Historic England (HE) on their Register of Parks and Gardens as per the above application. We have liaised with our colleagues in the Essex Gardens Trust (EGT) and their local knowledge informs this response. The GT/EGT have no objection to the felling of this tree, but we would suggest that a replacement tree be planted in its stead. Yours sincerely, Margie Hoffnung Conservation Officer
New Hall	Essex	E20/1004	II	PLANNING APPLICATION Demolition of existing outbuildings and erection of a single-storey detached dwelling house. Land North West Of 5 Bulls Lodge Cottages, Generals Lane, Boreham, Chelmsford, Essex. RESIDENTIAL	CGT WRITTEN RESPONSE 19.10.2020 Whilst acknowledging that efforts have been made to mitigate the impact of the proposed house compared with the previous application, we maintain our objection, considering this an opportunistic application of no public benefit, adding to the built form around the heritage asset, the setting of which is under great pressure from surrounding development. David Andrews FSA, IHBC Essex Gardens Trust
Adlestrop Park and House	Gloucestershire	E20/0950	II*	PLANNING APPLICATION Full Application for Single storey timber orangery to replace existing conservatory at Dovecote, Adlestrop, Moreton-In-Marsh, Gloucestershire GL56 0YN. BUILDING ALTERATION	CGT WRITTEN RESPONSE 10.10.2020 The Garden Trust as the Statutory Consultee for planning applications that might impact on heritage parks, gardens and landscapes; has notified The Gloucestershire Gardens and Landscape Trust (GGLT) to respond on its behalf. This proposal for an Orangery is a marked improvement on the existing conservatory that does little for the architectural merits of this Listed Building. From the Heritage, Design and Access Statement, on page 13, one does have an electronically generated three dimensional image of of the final construction. From this image, it is reasonable to anticipate that the Orangery will be a great improvement. However, from the drawings submitted there, could be some un-answered questions regarding the information that might be derived from a full set of elevations, the materials, and the junctions of the new construction with the existing structure. Yours sincerely, David Ball, (on behalf of the GGLT)
Stockley Park: Business park Phases I and II, and country park and golf course	Greater London	E20/0666	II	PLANNING APPLICATION Redevelopment of the site to provide two industrial units providing industrial floorspace (Use Class B1c/B2/B8) and	CGT WRITTEN RESPONSE 20.10.2020 We are grateful for the opportunity to comment on this application, which has a material impact on the significance of Stockley Park, a historic designed landscape which is Registered by Historic England at Grade II. The inclusion of this site on the national register is a material consideration.

				<p>ancillary officers together with associated parking, access arrangements, landscaping and infrastructure. GSK, STOCKLEY PARK, IRON BRIDGE ROAD WEST DRAYTON. LIGHT INDUSTRIAL</p>	<p>We object to this application in its current form, as it will lead to substantial harm to designated heritage asset Stockley Park.</p> <p>We write as the Planning & Conservation Working Group of the London Gardens Trust (LGT).</p> <p>The LGT is affiliated to The Gardens Trust (formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (English Heritage) Register of Parks and Gardens of Special Historic Interest. The LGT is the Gardens Trust for Greater London and makes observations on behalf of the Gardens Trust in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the LGT's Inventory of Historic Spaces (see www.londongardenstrust.org/conservation/inventory/ – Stockley Park entry pending) and/or when included in the Greater London Historic Environment Register (GLHER). For further information, we refer you to the list entry for Stockley Park (https://historicengland.org.uk/listing/the-list/list-entry/1466074) and the Gardens Trust publication The Planning System in England and the Protection of Historic Parks and Gardens (2019), which is available online at www.thegardenstrust.org</p> <p>We have previously objected to this application on the basis that it needs to be accompanied by a heritage impact assessment. We thank you for your email of 30/9/20 in which Savills have responded with an HIA. We strongly disagree with Savill's statement that 'the proposed development will not result in any material harm to the heritage asset' as even a limited understanding of the site and its significance demonstrates that the proposal will lead to substantial harm. We appreciate that the timeline of the application's submission alongside the Stockley Park's designation as a heritage asset meant that the HIA has been written after the proposals were drafted. We urge the applicants to revise their proposals now that they can gather a proper understanding of the site as a heritage asset and so that this can inform the development of their proposals rather than have to retrospectively justify them.</p> <p>As point of reference, Savills say 'It is important to note that Historic England responded to the consultation period with no comments to make on the proposals.' You will be aware that this is because Historic England limit their involvement on planning consultations to landscapes that are</p>
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					<p>registered at Grade I and II*, whereas Stockley Park is II. Their lack of comment should not be used to infer that the proposal is acceptable. This proposal will lead to substantial harm to the heritage asset. The existing Registered design has 3 buildings positioned carefully to create court-like spaces, in which car parking spaces are integrated as an striking landscape features amongst formal tree planting. The site arrangement makes noticeable use of geometric angular shapes and axial devices. This provides a clever contrast with the generous planting belts around the perimeter. The proposal replaces this sophisticated and landscape-focussed design with a basic layout in which 2 large buildings are wedged side by side with the minimal landscaping necessary for screening and habitat. The proposal also involves removing part of the iconic lime avenue plantings in order to provide vehicular access. The loss of quality in this part of the designated heritage asset will be substantial and create a noticeably different landscape style to the rest of the site.</p> <p>There is national and local policy of relevance to this application. At a national level, we refer you to NPPF 195, which is clear that ‘Where a proposed development will lead to substantial harm to ... a designated heritage asset, local planning authorities should refuse consent.’. The harm set out in the previous paragraph clearly constitute substantial harm to this designated heritage asset.</p> <p>Locally, Local Plan policy HE1.1 is relevant to this proposal in its commitment to ‘Conserve and enhance Hillingdon’s distinct and varied environment, its settings and the wider historic landscape, which includes Registered Parks and Gardens’. For the reasons set out above, this proposed development most certainly does not conserve and enhance Stockley Park, and rather destroys some historic features, as set out above. We object to this application in its current form and ask that the application review its development proposals in light of the recent designation of Stockley Park as. Grade II Registered historic designed landscape and refreshed understanding of its significance.</p> <p>The LGT objects to this planning application on the following grounds: Summary:</p> <ul style="list-style-type: none"> • loss of high-quality buildings carefully set within the designated landscape • The height, bulk and outline of the proposed buildings will have a harmful
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					<p>impact on the designated character of the park and the coherent design and detailing of the remaining original estate.</p> <ul style="list-style-type: none"> • loss of hundreds of plants and mature trees and the pond • destruction of the sophisticated, landscape-focussed design designated Grade II • negative impact on the quality and coherence of the rest of the listed park and country park beyond • negative impact on the setting of the canal and the natural habitat beyond which is of local importance <p>We would be grateful to be advised of your decision, or if further information is submitted.</p> <p>Yours Sincerely, Rose Wakelin Planning Conservation Project Officer For and on behalf of the Planning & Conservation Working Group planning@londongardenstrust.org c.c. Margie Hoffnung, Conservation Officer, The Gardens Trust c.c. Alison Allighan, Conservation Casework Manager, The Gardens Trust c.c Linden Groves</p>
Water Close, Winchester	Hampshire	E20/1049	N	<p>PLANNING APPLICATION Construction of a new dwelling with associated works. Land Adjacent Water Close, Colebrook Street, Winchester, Hampshire. RESIDENTIAL</p>	<p>CGT WRITTEN RESPONSE 27.10.2020</p> <p>I write to record my strong objection to this proposal on the following grounds.</p> <ol style="list-style-type: none"> 1. The garden will be largely destroyed as a result of the construction of this house which will include the entire garden, not just that shown on drawing no. 394.PL01. Note that the red line extends around the entire existing garden plot. 2. This garden forms an attractive and tranquil “incident” when approaching the cathedral through Water Close. The proposal will detrimentally affect the enjoyment one has when approaching the cathedral through the protected cathedral wall. The path is permissive and in the control of the cathedral. The intrusion of a new dwelling in this location will harm this approach which forms part of the setting of the cathedral close. 3. It will detrimentally affect the setting of 34 Colebrook Street which has enjoyed the garden as part of its surroundings for over 60 years. It will diminish the historic associations with Sir Peter Smithers who created the garden and once lived in Colebrook House. 4. It is an important and highly valued part of the conservation area and

					<p>links parts of the historic town. It contributes positively to the character of the conservation area and the setting of surrounding listed buildings. Not only is it visually attractive, but the gentle flow of water expresses a characteristic of the area which is an historically important element of the area being associated as it is with the medieval Lockburn and the Itchen river system of drainage in the area.</p> <p>5. It will impose and incongruous architectural element in the streetscene which takes no cues from surrounding design features or elements normally associated with the assessment of coherent character. Massing, form, materials etc are all wrong for this street.</p> <p>6.. If the trees survive the construction period (which is highly dubious) t will result in the ultimate call to remove the protected Magnolia trees due to their proximity to the proposed building and the likelihood of causing shadowing or physical abrasion. It will be difficult for the council to refuse such calls if the trees start to cause physical damage. This will further negatively impact on the character of the area and the historic associations with the garden’s creator.</p> <p>7. It will require disturbance of the buffer to the scheduled monument behind the Close Wall. Archaeology has not been mentioned as part of the justification.</p> <p>8. It will remove an attractive designed landscape from public enjoyment at a time when public access to open spaces is most important.</p> <p>Paragraph 193 of the NPPF requires that “great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). It should be recognised that the “asset” is more than just the individual plot – it is the conservation area and the setting of numerous listed buildings including the cathedral.</p> <p>Paragraph 194 says “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or form development within its setting) should require clear and convincing justification...”</p> <p>Paragraph 196 says “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.</p> <p>There is no public benefit to this proposal. There is only harm. The loss of</p>
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					<p>character of the area should not be underestimated in terms of the visual impact, disturbance to a tranquil setting and the loss of public amenity. Relevant policies to consider in terms of heritage and design include (but not exclusively):</p> <p>Local Plan Part 1: Policy WT 1 “Spatial planning will be achieved through... ensuring that all new development is of the highest design quality in terms of architecture and landscape, fully considers and respects the context of its setting and surroundings to reflect local distinctiveness, and the historical and cultural heritage of the Town, and makes a positive contribution to the quality of the area.”</p> <p>Policy CP20 – Heritage and Landscape Character “... will support new development which recognises, protects and enhances the District’s distinctive land-scape and heritage assets and their settings. These may be designated or undesignated and include natural and manmade assets associated with existing landscape and townscape character, conservation areas, scheduled ancient monuments, historic parks and gardens, listed buildings, historic battlefields and archaeology. Particular emphasis should be given to conserving:</p> <ul style="list-style-type: none"> • recognised built form and designed or natural landscapes that include features and elements of natural beauty, cultural or historic importance; • local distinctiveness, especially in terms of characteristic materials, trees, built form and ILPP2 – Policy WIN 1 – Winchester Town <p>“Within the defined settlement boundary of Winchester as shown on the Policies Map, planning permission will be granted for development which accords with the Development Plan and is consistent with the following principles aimed at delivering the Vision for Winchester Town:</p> <ol style="list-style-type: none"> i protect and enhance the special character of Winchester Town, including its setting, heritage assets and treed skylines; ...” <p>Policy WIN 2 – Town Centre Within the defined town centre as shown on the Policies Map, planning permission will be granted for development which accords with the Development Plan and is consistent with the following principles aimed at delivering the Vision for Winchester Town:</p> <p>[...]</p> <ol style="list-style-type: none"> iv enhance the sensitive historic environment of the town centre and its heritage assets...”
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					<p>WIN 3 – Views and Roofscape</p> <p>“Development within and around Winchester Town which accords with the Development Plan will be permitted, provided:</p> <p>i views that are integral to local character and distinctiveness are maintained, in particular views of treed skylines which connect Winchester with its setting;</p> <p>ii important views and vistas to and from the key historic features shown on the Policies Map (and listed below) are protected;</p> <p>iii roof designs are sympathetic to the character of the Town’s historic roofscape in terms of bulk, grain, form and materials and make a positive contribution to the roofscape;</p> <p>...”</p> <p>Policy DM26 – Archaeology</p> <p>“Where there is evidence that heritage assets above or below ground and their settings are known or suspected to exist, but their extent and significance is unknown, planning applications should incorporate sufficient information to define the significance and extent of such assets, as far as reasonably practica-ble. Where appropriate, applications should include:</p> <ul style="list-style-type: none"> • the results of desk based assessment/field evaluation; and • an assessment of the effect of proposals on the assets or their setting...” <p>Policy DM27 – Development in Conservation Areas</p> <p>“New buildings in Conservation Areas should:</p> <p>i. respond sympathetically to the historic settlement pattern, views, plot sizes and plot widths, open spaces, townscape, roofscape, trees and landscape features;</p> <p>ii. are of a height, massing, materials, plan form, roofscape and grouping of buildings in scale and harmony with adjoining buildings and the area as a whole. The proportions of features and design details should relate well to each other and to adjoining buildings;</p> <p>iii. include good quality building materials appropriate to the locality and sympathetic in colour, profile and texture;</p> <p>iv. ensure that walls, gates and fences are, as far as possible, of a kind traditionally used in the locality.”ayout, tranquility, sense of place and setting.</p> <p>LPP2 – Policy WIN 1 – Winchester Town</p> <p>“Within the defined settlement boundary of Winchester as shown on the Policies Map, planning permis-sion will be granted for development which accords with the Development Plan and is consistent with the following</p>
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					<p>principles aimed at delivering the Vision for Winchester Town: i protect and enhance the special character of Winchester Town, including its setting, heritage assets and treed skylines; ...”</p> <p>Policy WIN 2 – Town Centre Within the defined town centre as shown on the Policies Map, planning permission will be granted for development which accords with the Development Plan and is consistent with the following principles aimed at delivering the Vision for Winchester Town: [...]</p> <p>iv enhance the sensitive historic environment of the town centre and its heritage assets...”</p> <p>WIN 3 – Views and Roofscape “Development within and around Winchester Town which accords with the Development Plan will be permitted, provided: i views that are integral to local character and distinctiveness are maintained, in particular views of treed skylines which connect Winchester with its setting; ii important views and vistas to and from the key historic features shown on the Policies Map (and listed below) are protected; iii roof designs are sympathetic to the character of the Town’s historic roofscape in terms of bulk, grain, form and materials and make a positive contribution to the roofscape; ...”</p> <p>Policy DM26 – Archaeology “Where there is evidence that heritage assets above or below ground and their settings are known or suspected to exist, but their extent and significance is unknown, planning applications should incorporate sufficient information to define the significance and extent of such assets, as far as reasonably practica-ble. Where appropriate, applications should include: • the results of desk based assessment/field evaluation; and • an assessment of the effect of proposals on the assets or their setting...”</p> <p>Policy DM27 – Development in Conservation Areas “New buildings in Conservation Areas should: i. respond sympathetically to the historic settlement pattern, views, plot sizes and plot widths, open spaces, townscape, roofscape, trees and landscape features; ii. are of a height, massing, materials, plan form, roofscape and grouping of buildings in scale and harmony with adjoining buildings and the area as a</p>
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					<p>whole. The proportions of features and design details should relate well to each other and to adjoining buildings;</p> <p>iii. include good quality building materials appropriate to the locality and sympathetic in colour, profile and texture;</p> <p>iv. ensure that walls, gates and fences are, as far as possible, of a kind traditionally used in the locality.”</p> <p>Policy DM29 – Heritage Assets</p> <p>“...Works which would cause an unacceptable level of harm to the special interest of heritage assets or their setting, or would lead to the unsympathetic subdivision of their grounds, will only be permissible in exceptional circumstances, or in the case of higher grade heritage assets in wholly exceptional circumstances...”</p> <p>I trust that the planning authority will recognise the considerable deficiencies in this proposal and refuse it on the strongest grounds.</p> <p>Kind regards</p> <p>Alison J Davidson Pg Dip Cons, IHBC</p>
East Herts Sustainability SPD	Hertfords hire	E20/0780	n/a	LOCAL PLAN Sustainability Supplementary Planning Document (SPD) Consultation	<p>CGT WRITTEN RESPONSE: 07.10.2020</p> <p>East Herts has not only many Registered Parks and Gardens but also other sites of importance which are Locally Listed either by EHDC or by Hertfordshire Gardens Trust. These are vulnerable to both flooding and drought. East Herts already has a number of ornamental water bodies affected by changes to water supply, due to climate change, housing developments (both on the water source and due to abstraction) with low water levels, drying out and other issues. Similarly the carefully chosen and sited park trees are vulnerable with species being affected by new pests and diseases as well as direct impact from climate changes. Care needs to be taken over how dead/dying trees are replaced to maintain continuity of the original design effect. There also needs to be awareness that new tree planting in historic parks to act as a carbon capture measure could compromise the special character of parks and advice needs to be sought from Historic England or Hertfordshire Gardens Trust.</p> <p>Kate Harwood</p> <p>Hertfordshire Gardens Trust</p>
13 Pentley Park, Welwyn Garden City	Hertfords hire	E20/0803	N	PLANNING APPLICATION Sycamore - fell. 13 Pentley Park, Welwyn Garden City AL8 7RT. TREES	<p>CGT WRITTEN RESPONSE 20.10.2020</p> <p>We note that no evidence is submitted for the condition of this sycamore requiring it to be felled, nor has any advice been sought from the council. If permission is granted to fell, we would support the replanting of a tree of suitable species. (for 6/2020/2475/EMT)</p>

				OUTCOME 21.10.2020 No objection	Kate Harwood Hertfordshire Gardens Trust
37 Sherrardspark Road, Welwyn Garden City	Hertfords hire	E20/0863	N	PLANNING APPLICATION Erection of single storey rear extension, partial conversion of garage, internal alterations on ground and first floor, conversion of existing loft space including 1 x velux roof light at front and 4 x at rear. 37 Sherrardspark Road, Welwyn Garden City AL8 7JY. BUILDING ALTERATION	CGT WRITTEN RESPONSE 02.10.2020 We have no comments to make on the proposed extensions and garage conversion per se. We do note, however, that the application states that the property is in the 'original Welwyn Garden City vernacular' with which we concur. That being the case the insertion of a velux window in the front roof is not in keeping with this property or with neighbouring properties where dormer windows have been used. We consider that a dormer window to the front would be more in keeping both with the house's 'WGC vernacular' and with the streetscape of this area. Kate Harwood Conservation and Planning Hertfordshire Gardens Trust
76 Brockwood Lane, Welwyn Garden City	Hertfords hire	E20/0877	N	PLANNING APPLICATION T1- Oak 3m Crown reduction, T2- Ash Remove low limb, T3 Hornbeam Crown Lift, T4 Oak Remove low Limb, T5 Ash Remove low limb, T6 Oak 3-4m crown reduction, T7 Oak 3-4m reduction, T8 Oak fell to ground level, if not possible pollard. T9 Hornbeam Cut back over hang and crown lift 5m, T11 Hornbeam Crown Lift 5m, T12 Hornbeam Crown Lift 5m, T13 T14 T15 group of hornbeam, 3-4m crown reductions, T16 T17 T17a Group 2x oak trees 1 x Acer Fell to ground level, T18 Hornbeam Major cut back and lift 6m, T19 Hornbeam Cut back and lift 6m, T20 Oak Cut back over hang, T21, Hornbeam Fell to ground level, T22 Hornbeam Heavy Pollard, T23 Hornbeam 3-4m reduction, T24 Oak Fell to	CGT WRITTEN RESPONSE 01.10.2020 Thank you for consulting the Gardens Trust, of which HGT is a member. We commented on a previous application, 6/20201573/TC in July 2020 for tree works to this property. The works proposed in this current application are very extensive and would affect the historic Sherrardspark Wood at this property. We have not seen any arboricultural report to justify the need for these major works so are unable to comment. Kate Harwood Hertfordshire Gardens Trust CGT WRITTEN RESPONSE 14.10.2020 Thank you for consulting The Gardens Trust, of which HGT is a member. Our comments on 6/2020/2409/TC, submitted on 1/10/20 for these tree works noted that there was no arboricultural report justifying these extensive interventions. We note from this current application that no advice has been sought from WHBC. We would consider that either an arboricultural report from an independent tree surgeon or advice from WHBC should be obtained before this application is determined. Kate Harwood Hertfordshire Gardens Trust

				ground level, T25 Hornbeam 3-4m Reduction, T26 Acer 3-4m reduction. 76 Brockwood Lane, Welwyn Garden City AL8 7BQ. TREES	
18 Firs Wood Close, Northaw	Hertfords hire	E20/0878	N	PLANNING APPLICATION Single storey rear extension. 18 Firs Wood Close, Northaw, Potters Bar EN6 4BY. BUILDING ALTERATION	CGT WRITTEN RESPONSE 01.10.2020 Thank you for consulting The Gardens Trust, of which HGT is a member. We have no comment to make on the proposed works as detailed in this application. The wider historic landscape surrounding the properties appears to be sufficiently well-screened so there should be no adverse effect due to glare from the extra glazing Kate Harwood Hertfordshire Gardens Trust
Harris House, Tring	Hertfords hire	E20/0894	N	PLANNING APPLICATION Construction of manege. Harris House, Pendley Farm, Station Road, Tring, Hertfordshire HP23 5QY. EQUESTRIAN	CGT WRITTEN RESPONSE 01.10.2020 Thank you for consulting Hertfordshire Gardens Trust, a member of The Gardens Trust. The area subject to the application is part of Pendley Manor, a park of historic interest entered on the Dacorum BC Local List. It was part of the paddocks which adjoined the avenues in this section of the site. We consider that the manege per se would not cause substantial harm to the landscape as long as no ancillary buildings or structures are erected. There would be some loss of openness across the paddocks with the planting of the hedge along the post and rail fence which would compromise the park character, but this would be preferable to a view of the manege surface as described Kate Harwood Hertfordshire Gardens Trust CGT WRITTEN RESPONSE 03.10.2020 Thank you for your letter of 2 October concerning amended information for this application. We have nothing to add to our comments submitted to you on 1st October. Kate Harwood Hertfordshire Gardens Trust
Camfield Place, Hatfield	Hertfords hire	E20/0909	N	PLANNING APPLICATION Erection of a first floor rear extension including 3 rooflights. Meadow	CGT WRITTEN RESPONSE: 5/10/20 Thank you for consulting The Gardens Trust, of which Hertfordshire Gardens Trust is a member.

				View, Wyndham Cottage, Camfield Place, Kentish Lane, Hatfield AL9 6JE. BUILDING ALTERATION	Meadow View is situated on a subsidiary drive of Camfield Place leading to the Home Farm, and overlooks falling land towards the historic landscapes of Essendon Place and Bedwell Park. Although outside the pleasure grounds and main parkland of Camfield Place it is still within the historic estate land, with a horse chestnut plantation to the northwest and farmland to the northeast. Although the proposed large amount of glazing in the rear gable end will be visible, we consider there is enough tree screening to mitigate any glare affecting the historic designed landscapes. Kate Harwood Hertfordshire Gardens Trust
Napsbury Hospital	Hertfords hire	E20/0963	II	PLANNING APPLICATION Partial garage conversion with rooflights, alterations to openings and front pathway. 21 Farm Crescent, London Colney, Hertfordshire AL2 1UF. BUILDING ALTERATION	CGT WRITTEN RESPONSE 14.10.2020 Thank you for consulting The Gardens Trust of which HGT is a member. On the basis of the information contained in this application we do not consider that the Napsbury Hospital RPG will be adversely affected. Therefore we have no objections. Kate Harwood Hertfordshire Gardens Trust
Napsbury Hospital	Hertfords hire	E20/0984	II	PLANNING APPLICATION Single storey rear extension. 2 Azalea Close, London Colney, Hertfordshire AL2 1Ua. BUILDING ALTERATION	CGT WRITTEN RESPONSE 21.10.2020 Thank you for consulting Hertfordshire Gardens Trust, a member of The gardens Trust, statutory consultee for Registered Parks and Gardens. We have no comments on the design of the proposed extension but are concerned that nearby trees, which the applicant states will not need to be pruned, may nevertheless be affected by this development. Specifically, any root area near to the proposed extension should be protected, either from excavation during building or from compaction, should permission for building be given. Kate Harwood Hertfordshire Gardens Trust
78 Woodhall Lane, Welwyn Garden City	Hertfords hire	E20/0997	N	PLANNING APPLICATION Fell 1 x Cherry (T1). 78 Woodhall Lane, Welwyn Garden City AL7 3TF. TREES	CGT WRITTEN RESPONSE: 20.10.2020 Thank you for consulting The Gardens Trust, of which HGT is a member. We note that no evidence is submitted as to the amenity value of this tree or the condition it is in. If permission if given to fell, a replacement tree of a more suitable species should be required to be planted. Kate Harwood Hertfordshire Gardens Trust
Belvoir Castle	Leicesters hire	E19/0711	II	PLANNING APPLICATION New clubhouse and indoor cricket	GT WRITTEN RESPONSE 17.10.2020 Further to our original response of 26th September, we have looked at the

				<p>school. Belvoir Cricket Club, Harston Lane, Knipton NG32 1RJ. SPORT/LEISURE</p>	<p>amendments provided by the applicant. Unfortunately, we still cannot support the proposals as the cricket coaching building remains industrial in design, is still far too high (approximately 25% higher than the existing Pavilion) and is in our opinion, totally incompatible with its sensitive location when arriving at the south entrance to Belvoir from the south-east, one of three important entrances to the Park.</p> <p>We repeat our previous comments that as the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from development within its setting. Any harm to a designated heritage asset requires clear and convincing justification (NPPF Para 194). In our opinion this proposal would cause harm not just to the registered landscape but also the setting of the Grade I Belvoir Castle and other listed structures within the landscape. We feel that this building would not enhance or sustain the significance of the various heritage assets and detracts from their setting. The GT further suggests that this application is contrary to the Conservation Area Policy of Melton Borough DC, in particular Policies BE8 (Planning permission will not be granted for development which would adversely affect the setting of a listed building) and BE2 (Planning permission will not be granted for development within a designated conservation area unless it is of a high standard of design and would preserve or enhance the traditional character of the area).</p> <p>Should your officers grant permission for this building in such a sensitive and important site, namely directly in the foreground of a prime view of Belvoir Castle and park setting from a public road, and near a major entrance, we have grave concerns that it will set an unwelcome precedent for the future, adversely affecting principal views of the park.</p> <p>The GT OBJECTS to this application.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Ayscoughfee Hall	Lincolnshire	E20/0979	II	<p>PLANNING APPLICATION Gazebo style seating area for cafe. AYSCOUGHTEE CAFE, AYSCOUGHTEE HALL, CHURCH GATE, SPALDING PE11 2RA. CATERING</p>	<p>CGT WRITTEN RESPONSE 27.10.2020</p> <p>Lincolnshire Gardens Trust was surprised to find no mention of the significant garden history in the Heritage Impact Assessment for the above planning application for a gazebo-style seating area in the Public Gardens at Ayscoughfee Hall, especially when the Visit Ayscoughfee Hall Page of the South Holland District Council website lists it heritage highlights, as follows:</p>

					<p>'The Hall sits within five acres of unique public gardens. Among the attractions of the beautiful grounds are a late eighteenth century ice house, fine yew hedges dating back to the 1720s, an ornamental lake and a war memorial designed by Sir Edwin Lutyens.'</p> <p>More importantly, the gardens are considered as of significant historic importance, and are registered Grade II in Historic England's National Parks and Gardens Register. See the full Register description. https://historicengland.org.uk/listing/the-list/list-entry/1000969</p> <p>In the opinion of Lincolnshire Gardens Trust this proposal for a gazebo would have a negative and inappropriate impact not only on the gardens but also on the setting of the Lutyens WWI Memorial.</p> <p>1. Spalding's MP Francis McLaren was killed in a flying accident on 30 August 1917 and it was his wife Barbara Freyberg, who proposed the memorial. As a result, and out of a desire to retain her connection with the town, Barbara was instrumental in the construction of Spalding War Memorial. She commissioned Sir Edwin Lutyens through her aunt, garden-designer Gertrude Jekyll—a friend and collaborator of Lutyens'. She donated £1,000 towards the cost of the memorial and attended the unveiling ceremony on 9 June 1922. Spalding's war memorial commemorates 224 lives lost during the First World War. Lutyens' tranquil Tuscan pavilion design was chosen above 5 others. Spalding's memorial takes the form of a brick pavilion in front of which is a 12 feet (3.7 metres long Stone of Remembrance; both are situated at the head of a long reflecting pool, which incorporates the remains of an early 18th century canal.</p> <p>2. The Spalding War Memorial, Ayscoughfee Hall, Lincolnshire, was upgraded in 2015 to Grade I (from II) is part of the previously unrecognised national collection of 44 Lutyens' war memorials, a legacy like that of Wren's churches or Nash's Regency terraces. Seven of Lutyens' memorials are now Grade I listed – representing half of the total number of all Grade I war memorials in England. It is also considered in the same league as other examples of other fine war memorials inserted into older landscapes in the nation : such as Edwin Lutyens' arch in Victoria Park, Leicester (Listed Grade I) and his cenotaph in Watts Park, Southampton (Listed Grade II*). Ref: Historic England War Memorial Parks and Gardens Introductions to Heritage Assets (November 2015).</p> <p>3. The memorable 20C Lutyens Grade I-listed Memorial is situated at the end of the formal canal, almost as if a classical eye-catcher, and is directly</p>
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					<p>on view from the nearby environs of the 1970's café. A seemingly 'off-the shelf' gazebo such as submitted in this proposal in no way compares with the quality and significance of Spalding's nationally significant WWI War memorial by the celebrated architect who was also responsible for the London's iconic Grade I Cenotaph. The view from the Lutyens pavilion is the Church of St Mary and St Nicolas, Grade I, the ancient parish church of Spalding. Whereas the 1970's café is tucked reasonably discreetly behind the yew hedging, the gazebo would be directly in the line of view towards the spire of the church – between the oak and the yew hedging - which would harm the aesthetic sense of place and the likely intentional, subliminal shared remembrance link between the two. See the photographs below.</p> <p>4. The proposed, seemingly 'off the shelf ' gazebo is, in the opinion of Lincolnshire Gardens Trust, inappropriate both in design and in materials to the quality of the setting, the Lutyens Grade Memorial and the Grade II historic gardens let alone in the view to the historic Grade 1 13th century church. There is already an outside seating area, which is unobtrusive, but to erect such a gazebo with an obvious contemporary roof structure, would be a major distraction in the overall vista of the historic gardens and church.</p> <p>5. Lincolnshire Gardens Trust would support a more sympathetic solution to encourage the management of the café and for the public to enjoy refreshments in the park and gardens in all weathers. There might be a more logical and quite possibly less expensive solution for providing both shade and cover for this amenity in the public park, a solution which has been adopted by most pubs, restaurants, sporting facilities etc: removable large parasols/canopies. To give adequate cover would require between 1 and 4 of those, which apart from their heavy bases, are completely removable and can be put up and down as required. Another option would be to have a large roll-out canopy attached to the gable end of the existing café, or even more preferably on the more discreet south-facing elevation. There will not be anything visible when the canopy is retracted, apart from a slimline box which would house it.</p> <p>As it stands, for all the above reasons, Lincolnshire Gardens Trust object to this proposal.</p> <p>Steffie Shields M.B.E. Chairman, Lincolnshire Gardens Trust</p>
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Happisburgh Manor	Norfolk	E20/0980	II	<p>PLANNING APPLICATION Five self-contained bio-secure accommodation units supporting the existing clinical services at Happisburgh Manor. Land off Beach Road, Happisburgh MEDICAL/HOSPITAL</p>	<p>GT WRITTEN RESPONSE 23.10.2020</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. We have liaised with our colleagues in the Norfolk Gardens Trust (NGT) and their local knowledge informs this response. We have studied the online documentation and the proposed site for the five timber-clad buildings just outside the southern edge of the Grade II registered park and garden (RPG) of Happisburgh, which is one of the most important surviving Arts & Crafts gardens in Norfolk. Happisburgh Manor (Grade II*) was built in 1900 for Albemarle Cator on a virgin site, in a butterfly shape with a number of sheltered terraces and surrounding series of garden compartments. The Cators extended the gardens to the south to create an orchard, before the house was requisitioned by the Observer Corps during WWII. New owners bought the property in 1989 and the neglected gardens have been partially restored and partly recreated in an Edwardian style. We were not aware that the property had become a diabetes clinic and could find out nothing about this online.</p> <p>The accompanying documentation states that the main house is situated on higher ground and that the application site is not visible. We have been unable to undertake a site visit but would like reassurance that the bio-secure units would not be visible from the southern garden compartment, a curving raised sun terrace directly accessed from the house, from which steps lead down to the main level where grass paths and deep herbaceous borders flow around the property. We are concerned that should even glimpses of the wooden chalets be visible they will adversely affect the setting of the RPG as their pedestrian nature in no way reflects the innovative and high quality design of the main house, its curtilage and setting.</p> <p>The units do not appear to have any onsite parking and patients will need to be dropped off and collected as required. Clearly this will have an impact upon the traffic on Beach Road, already mentioned negatively by local residents in on-line objections.</p> <p>We would like to see a Visual Impact Assessment to reassure us that there is no visibility whatsoever from within the RPG, the main house, and the Grade II thatched summerhouse on the southern end of the eastern terrace garden. Without such reassurance we would like to lodge a holding objection until these concerns can be allayed.</p>
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					Yours sincerely, Margie Hoffnung Conservation Officer
Ingleborough Hall	North Yorkshire	E20/0180	N	PLANNING APPLICATION Full planning permission for change of use of former Sawmill to visitor centre, cafe, ticket office, community/education rooms with associated amenities and associated external works to provide carparking, widening of existing vehicular access and provision of new pedestrian access. The Old Sawmill, Eggshell Lane, Clapham, LA2 8DU. VISITOR FACILITIES	CGT WRITTEN RESPONSE 07.10.2020 Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to any proposed development affecting a historic park and garden site. 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 historic parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of such consultations. Ingleborough Hall, Clapham is a non-registered site, but of significance as the home of the Farrer family of whom the best-known member was Reginald Farrer (1880-1920), the traveller and plant collector. He travelled to Asia in search of a variety of plants, many of which he brought back to England and planted near his home at Ingleborough Hall. He also published a number of books connected with plant hunting and rock gardens. We refer you to our letter of 29th May and we note that the original planning application was subject to a number of amendments during the submission stage following consultation with the appointed planning officer. The building was subsequently listed on the 10th July 2020 listing reference 141367. The amended proposal has been developed to respect the change in status and advice provided by the LPA. We support the Planning Statement and Justification dated 20th September and the reduction of car parking spaces – disabled car parking spaces reduced from three to two and the staff etc parking reduced from six to three. In addition, we welcome the gravel replacing the setts in the parking bays. As noted in our letter of 29th May re Design and Access Statement 5.07 - ... the planting of a beech hedge adjacent to the post and rail fence providing separation to the domestic curtilage. This planning application now has an additional section due to the proposed reduction in the car parking spaces and we reiterate our suggestion that mixed native species hedging would be more appropriate and provide more biodiversity than a single species such as beech, which is not considered to be native to the north of England. Species such as: Hazel - <i>Corylus avellanna</i> , Spindle - <i>Euonymus europaeus</i> , Field Maple - <i>Acer campestre</i> , or with prickles; Hawthorn- <i>Crataegus monogyna</i> , Blackthorn - <i>Prunus spinosa</i> , Holly - <i>Ilex aquifolium</i> .

					<p>We have no objection to this planning application.</p> <p>Yours sincerely, Val Hepworth Trustee and Chairman Conservation and Planning cc. Historic England; Margie Hoffnung, the Gardens Trust</p>
Gilling Castle	North Yorkshire	E20/0904	II	<p>PLANNING APPLICATION Change of use of wasteland and replacement with stone chippings to provide parking area (retrospective). Land Off Pottergate, Gilling East, Helmsley. PARKING</p>	<p>CGT WRITTEN RESPONSE 12.10.2020</p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to any proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. In this case the park, garden and designed landscape at Gilling Castle, which is registered Grade II. 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>Gilling Castle has a park with medieval origins and the gardens, largely terraced, probably date from the early 18th Century but may also have earlier origins. Gilling Castle (listed grade I) is a 14th Century tower house with late 16th Century alterations which was extensively remodelled in the early 18th Century. There are views over falling land and terraced gardens to the south and east, and over rising parkland beyond.</p> <p>This retrospective planning application relates to land to the east of Gilling Castle that is situated within the Registered Park and Garden towards the north east boundary and immediately south of Pottergate. Also, importantly the site is within the Howardian Hills AONB and so has particular protection.</p> <p>We completely disagree with the assertion that the application site is 'wasteland'. It is an important part of the avenue of trees that forms the second principal approach to Gilling Castle developed along with the Lodge in the village of Gilling East, following the arrival of the railway in the village. This drive was in marked contrast to that from the York direction where visitors and family would have approached across the 'wild' designed landscape of Yearsley Moor before entering The Avenue that leads to the south west of Gilling Castle.</p> <p>The avenue from Gilling East is not a public right of way but the landowner has kindly allowed its use by local people for many years and the application site is clearly visible. We have recently been along Pottergate, the public highway, and the cars interrupt the view into the landscape of grass and trees across the lane. The trees frame the view of the sloping</p>

					<p>ground. The cars are intrusive, and should any of the trees die - minor changes to ground level and compaction could be a causative factor - then the visual impact will be much worse. We note that the golf club house is a fairly discreet wooden building with some parking, but to one side of the vista through the original designed landscape.</p> <p>We are very disappointed that the car park has been made in this sensitive location and we presume without discussion with the Ryedale DC Conservation Officer and the Manager of the Howardian Hills AONB. We recommend that discussions take place and we object to the proposed site being used as a car park due to its harmful impact on the Registered Park and Garden and the Howardian Hills AONB.</p> <p>Yours sincerely, Val Hepworth Trustee and Chairman Conservation and Planning cc. Historic England; Margie Hoffnung, the Gardens Trust</p>
Museum Gardens, York	North Yorkshire	E20/0945	II	<p>PLANNING APPLICATION 459911 Northings: 452098 For: Raise and extend existing flood embankment within Museum Gardens; installation of storage container at southern end of Marygate for demountable flood defences; temporary construction compound in Marygate car park during the construction works period as part of the York Flood Alleviation Scheme. Museum Gardens, Museum Street, York. DRAINAGE/FLOOD RELIEF</p>	<p>CGT WRITTEN RESPONSE 22.10.2020</p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to the proposed development affecting Museum Gardens, a site included by Historic England (HE) on their Register of Parks & Gardens at grade II. 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 Museum Gardens were laid out by Sir John Murray Naesmyth (1803-76) of Dawyck, Peebleshire for the Yorkshire Philosophical Society in 1844, designed to provide a setting for the Yorkshire Museum and the many ancient monuments and to incorporate botanical gardens. Naesmyth was asked to 'surmount the peculiar difficulties presented by the site so as to produce the most pleasing effects by the harmony or contrast of its varied architectural features... to open out the interesting views of more distant objects, while excluding as much as possible of such as are unsightly or incongruous' (Goodchild, see ref below).</p> <p>Today it remains a beautiful and peaceful historic garden in the centre of York with some views to the south and south west over the gardens to the river, although some views have been lost due to the maturity of the trees. The existing embankment was created in the 1980s and runs over an area that would have been the site of Order Beds, a botanic garden with a geometrical layout, which was probably grassed over in the 1980s. The</p>

					<p>conservation area appraisal highlights the Museum Gardens as a strength due to its unique ambience where visitors can experience the natural and historic elements of the surroundings. It states that it is important that any changes to the gardens ensure that this balance is maintained.</p> <p>We are very pleased to see the comprehensive assessments and other documents that accompany this planning application including the Heritage Desk-based Assessment detail:</p> <p>‘The flood wall in Museum Gardens would be raised, including the section which oversails St Mary’s Abbey precinct wall, to continue the new standard of protection (SoP) established by the raising of the Marygate floodwall. This floodwall ties into the existing flood embankment within Museum Gardens. To continue the new SoP, the existing embankment would be raised by a maximum of approximately 0.72 m to 11.12m AOD and would be extended eastwards to tie into higher ground. Terracing would be employed in centre areas of the embankment raising to enable retention of a True Service Tree and to create interest in its form. Raising and extending the flood embankment would require excavation within the footprint of the extended embankment to a depth of up to 600mm. Some excavation to remove tree stumps and roots following tree clearance operations may also be required.’</p> <p>There are many special trees in Museum Gardens including the True Service Tree which is the rarest native species in the country and we are very pleased that the Environment Agency in discussion with others has been able to redesign the embankment to protect it and other trees and secure their future.</p> <p>Although the raising of the embankment will have a direct impact on the conservation area and registered park and garden, we understand the importance of the Flood Alleviation Scheme and consider that the work proposed has mitigated adverse consequences as much as possible. We appreciate the introduction of the terracing on the dry side of the bank and the planting of the 'compensation' trees. Most of the monuments will be unaffected by the works and the location of the embankment to the rear of the Hospitium means that the relationship with the wider setting will be maintained. We agree that the proposed terracing provides the opportunity to retain public access to the rear of the Hospitium, while introducing a new feature which blends into the landscape.</p> <p>Yours sincerely, Val Hepworth</p>
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					Trustee and Chairman Conservation and Planning Cc. Historic England (e-yorks@historicengland.org.uk; Margie Hoffnung, the Gardens Trust REF: P Goodchild Heritage Report – Museum Gardens, (HLF Urban Parks Programme 1996).
Badger Dingle	Shropshire	E20/0631	II	PLANNING APPLICATION Erection of an agricultural building with hardstanding and automated gate. Proposed Agricultural Building, Land To The South Of Woodland Known As Badger Clump Off, Badger Lane, Badger Bridgnorth. AGRICULTURE	GT WRITTEN RESPONSE 12.10.2020 With reference to the above application, we are now in receipt of the Heritage Impact Statement (HIA) produced for the applicant by Richard K Morris & Associates and are in a position to comment on the proposed application. The historic designed landscape at Badger As outlined in the applicant’s HIA, the Grade II Registered Park & Garden at Badger is considered to be the work of the celebrated Midlands landscaper, William Emes (1729-1803), working with his sometime associate John Webb. Badger is celebrated for its ornamented valley, known as ‘The Dingle’, containing an elegant serpentine lake characteristic of William Emes’ style of waterworks (cf. the lake at Hawkstone). The Dingle itself is surrounded to the west, north and east by parkland and other areas now included within the Registered Park & Garden, much of which was formerly planted with trees as shown on the Ordnance Survey (OS) 1st Edition plan (1882, see Figure 1 below, which also highlights the area of the proposed development, to the south and west of Badger village). The enlarged extract from this plan (Figure 2) shows that the whole of this part of the northern boundary to Badger Dingle, including that adjacent to the proposed development area, took the form of a ‘Ha-ha’ or ‘sunken boundary’ arrangement (highlighted in green wash). This was intended to allow views out from the northernmost path within the Dingle (shown by the green arrows in Figure 1: Extract from the OS 1st Edition (1882) showing the landscape of Badger, with the Registered Park & Garden highlighted in green wash. The proposed development area, within the Registered Park and immediately adjacent to the north side of Badger Dingle, is highlighted in red. Lodges to east and south-west, both of which survive, mark the two formal approaches through parkland and woodland areas to Badger Hall. Figure 2: Enlarged extract from the OS 1st Edition plan as above (1882) showing the south-western corner of the Badger Dingle, with the proposed development area highlighted in red. It can clearly be seen from this plan,

					<p>that the whole of this part of the Dingle’s northern boundary took the form of a ‘Ha-ha’ or sunken fence (highlighted in green wash). This would have allowed views from the northernmost path within the Dingle, into the adjacent field and beyond, to the wider designed landscape including the approach to Badger Hall (the green arrows show indicative viewlines). Figure 2) to the adjacent field (within which is the proposed development area) and to the wider designed landscape. These views would have also have included both the tree-lined western approach to Badger Hall (shown on this map extract) and the agricultural lands beyond, as shown on Plate 3 of the applicant’s HIA document. It is not insignificant that the northern side of these agricultural lands (part of which were the former ‘Glebe Lands’ referred to in the applicant’s HIA) was planted as a woodland belt, within which there ran a second, westerly approach to Badger Hall (see Figure 1).</p> <p>Thus, while it is strictly correct to say (as in the applicant’s HIA) that the lands enclosed between this woodland belt and the Dingle itself were ‘not part of the park’ at Badger (the “park” proper lay to the north and east of Badger Hall), this misses the point entirely – they were and remain an important element in William Emes’ landscape design.</p> <p>Views of this kind into the wider agricultural landscape from paths near to the edge of an ornamented woodland walk, often across a ‘Ha-ha’ or sunken fence, are a recurring theme both in William Emes’ own designs and more widely in the landscapes of the mid- to late-18th century, as for example at Hulton Park near Bolton, Lancashire, or in the so-called ‘Long Walk’ at Attingham Park, laid out by Emes’ former assistant, Thomas Leggett. These were often linked to the enhanced productivity and improved agricultural methods of the time, including new breeds of cattle, sheep and horses, which owners were understandably, keen to display.</p> <p>The proposed development</p> <p>The proposal, as outlined in the applicant’s Design & Access Statement, is for an agricultural building on a concrete base, clad in corrugated material, of plan size 10m x 7m with double pitch roof of eaves height 2.8m and ridge height 3.45m. This to stand within an area of hard standing (stated as ‘grit stone’) of roughly 80-90m².</p> <p>The purpose of the proposed building is stated as being to provide storage for an agricultural tractor (not yet purchased), with plans submitted showing also that the building will in addition provide space for ‘disabled vehicle parking’, presumably as the applicant lives some way from the site.</p>
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					<p>Garden of Badger, which is a designated heritage asset.</p> <p>Later, in section 7.1 Impact on the Designated Park and Garden (p.18), the HIA states firstly (para.1) that ‘As noted in the official description [i.e. the Historic England Park & Garden Register Entry text] “The gardens and pleasure grounds fall into three parts: the gardens, the Dingle pleasure grounds and the shrubbery drive which connects them”’. Given that this statement was part of the description of the gardens & pleasure grounds at Badger, it is hardly surprising that it should not refer to areas outside of them.</p> <p>The HIA nonetheless argues (para.2) that as ‘The study site is not included in either of those parts...’ it is justified in concluding (para 2) that ‘...the study area...is and has always been agricultural land – and is now a rather secluded field because of the mature hedgerow boundaries on three sides and the woodland of the Dingle on the fourth’.</p> <p>Regarding the woodland of the Dingle, HIA states further (para 5) that ‘...there was never any intent for the woodland to be viewed from the agricultural fields around it: the ground were, after all, for the owners and their guests to perambulate and not for the tenant farmers and their servants to peer into’.</p> <p>Such a statement betrays a wholly unsatisfactory and surprising lack of understanding of designed landscape in general and of the elements of Badger Dingle in particular. This is doubly surprising as the HIA also includes (at Fig 3) the same extract from the OS 1st Edition plan as is reproduced above. Had the HIA’s author(s) examined in more detail what this plan actually recorded in the area of the proposed development, they might have noticed the network of paths within the Dingle woodland, and particularly that path immediately adjacent to the woodland boundary, with the sunken boundary or ‘Ha-ha’ adjacent to it, and perhaps would have concluded that this arrangement was intended to allow views out from the path to the wider landscape.</p> <p>We accept that the growth of trees and shrubs within the Dingle may have obscured this arrangement from a cursory inspection, but it is clearly shown on the historic plan and this should have alerted the author(s) to its significance.</p> <p>Given therefore the HIA’s fundamental misunderstanding of the subtle and ingenious manner in which the paths and woodland within the Dingle were laid out and intended to operate, it is not surprising when it finally concludes (para.9, p.19) that ‘...it is not considered that the proposed</p>
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					<p>agricultural building will impact on the setting of the designated park and garden and will result in no harm to its setting, character, or significance'. It is similarly unsurprising that in section 7.2 Impact on the Conservation Area (p.19) the HIA, '...for the same reasons rehearsed above in relation to the impact on the registered park and garden...', comes to a similar conclusion, that '...there could be no harm to the setting, character or significance of the conservation area'.</p> <p>We fundamentally disagree with this analysis and with its conclusions. It is our view that the proposed development will cause harm to both the Grade II Registered Park and Garden and to the Badger Conservation Area, and for similar reasons.</p> <p>In both cases, we consider that the harm will be less than substantial, although potentially significant.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Hestercombe	Somerset	E20/0745	I	<p>PLANNING APPLICATION Erection of a tent on the south lawn with a mobile toilet and service tent for a period of six years at Hestercombe House, Hestercombe Road, Cheddon Fitzpaine. MARQUEE</p>	<p>GT WRITTEN RESPONSE 15.10.2020</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. We have liaised with our colleagues in the Somerset Gardens Trust (SGT) and their local knowledge informs this response. A site visit has not been possible due to staff holidays and Covid restrictions. However, we are to some extent familiar with the application site and concur entirely with the comments made by Historic England. We also feel that a more recessive colour, perhaps a muted green, would be more suitable for the tent. Six years seems a long time for a temporary structure, and in our opinion, three years would be a more appropriate time frame.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
St Audries (House)	Somerset	E20/0968	II	<p>PLANNING APPLICATION Erection of a double greenhouse and shed (resubmission of 3/38/20/007). 1 Stowey Lodge, Track to St Audries Bay Holiday Camp, West Quantoxhead, TAUNTON, TA4</p>	<p>GT WRITTEN RESPONSE 18.10.2020</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.</p> <p>The application documents are very poorly put together and the heritage</p>

				4DX. GLASSHOUSE, MAINTENANCE/STORAGE/OUTBUILDING	<p>statement makes no mention whatsoever of the fact that the application site lies within the Grade II registered park and garden (RPG) of St Audries House, or the AONB. The drawings of the greenhouse and shed are not at all clear – presumably the structures were put up without planning consent and so the existing and proposed structures are the same thing? We would have expected to see a far more professional heritage statement and a visual impact assessment showing whether these structures will impact upon the RPG or its setting. There is also no mention of protection zones for the various trees which appear to surround the structures. A TPO might be a sensible precaution to prevent the loss of more trees to increased development within the garden area?</p> <p>The NPPF requires an applicant to describe the significance of any heritage asset(s) affected (Para 189) including any contribution made by their setting. Failure to provide this information means that this application does not comply with the NPPF. We would suggest that your officers ask the applicant to provide all the missing information before any decision is made.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
Wentworth Castle	South Yorkshire	E19/1566	I	<p>PLANNING APPLICATION</p> <p>Demolition of existing bungalow and erection of new dormer bungalow and associated works including provision of new vehicular entrance gates; Pine Lodge, Stainborough Lane, Hood Green, Barnsley S75 3EZ.</p> <p>DEMOLITION, RESIDENTIAL</p>	<p>CGT WRITTEN RESPONSE 27.10.2020</p> <p>Thank you for re- consulting The Gardens Trust (GT) with the amended plans for Pine Lodge. 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 historic parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of such consultations.</p> <p>Wentworth Castle's triple Grade I listing, for its historic parkland, its gardens and its house, emphasizes the site's importance internationally. We refer to the GT letter of 30th January 2020 and thank you notifying us of the revised plans for the proposed development at Pine Lodge which is situated within the parkland and along the south west boundary of the registered historic designed landscape. (We have been unable to find the Gardens Trust or the National Trust on the list of consultees on your Authority's website.)</p> <p>As you know we are concerned about any impact that the development could have on the views from the parkland particularly from the north and east. We note the reduced footprint of the house and the relocation of the</p>

					<p>garage to the north. However, although this is an improvement, in terms of the impact on the Registered Park and Garden parkland and also the openness of the Green Belt we still have some concerns. The garage remains a substantial building at 1 ½ storeys with a large number of rooflights, dormers and a window that altogether seems excessive. The northern elevation has three pairs of rooflights (6), the south elevation two dormers and one double rooflight and there is also a large window on the western elevation. We are pleased that there are no windows on the eastern side. However due to the height of the building, the potential for light intrusion into an area which is currently dark at night would be extremely likely and a retrograde step.</p> <p>We consider that the garage should be more modest in form and the northern rooflights omitted.</p> <p>In addition, we request that consideration is given to ensuring that there is better screening of the new development from the parkland by additional planting on the northern and eastern boundaries and this should include some evergreen species such as hollies and Scots pine. We note in the Arboricultural Report at 3.34 that some crown lifting of trees on the western boundary would be possible to improve the views from the property. Although we understand an owner’s wish for views out beyond their boundary, we would also point out that these can of course result in reciprocal views from the registered park that may make the development more intrusive and harmful in the landscape. Therefore, we advise that care is taken and reciprocal views are sensitively managed and not damaged.</p> <p>We trust that our concerns will be taken into account and in view of the amendments already made, we consider that together they would reduce the impact and harm on the setting of the highly significant historic park and garden.</p> <p>Yours sincerely Val Hepworth Trustee and Chairman Conservation and Planning cc. Historic England; Margie Hoffnung, the Gardens Trust</p> <p>GT WRITTEN RESPONSE 28.10.2020 Thank you for re-consulting The Gardens Trust (GT) with the amended plans for Pine Lodge. We have discussed these amended plans further with the Yorkshire Gardens Trust (YGT) and refer to our letters of 30th January</p>
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					<p>and 28th May earlier this year.</p> <p>We are concerned to note that the applicant's revised heritage assessment of the Grade I gardens and separate Grade I parkland, within which the application site lies, does not address their design history, vistas, water bodies or tree species.</p> <p>It is more thorough with regard to listed structures, although the Battlemented wall with its two bastions and associated Archers Hill Gate, listed Grade II (Historic England ref: 1191749), the listed structures nearest to Pine Hill Lodge, have unaccountably been omitted from their map.[No. 4 actually marks the 'triple archway' site, whilst Lady Mary's Obelisk is set inside the lower bastion of the battlemented wall]</p> <p>We note that an ecological assessment of Keepers Pond, with its potential great crested newt population - a protected species under the Wildlife and Countryside Act 1981- has been undertaken, (section 6.6) but the report has not been included with this amended application.</p> <p>Four important historic views were created over this area :</p> <p>The earliest A) from Stainborough Castle, erected 1727-1731 over the surrounding parkland and far beyond in all directions.</p> <p>The second B) from the battlemented wall's two bastions over this western end of the parkland and farmland, was designed in the 1730's. The lower bastion includes Lady Mary's Obelisk, (Historic England ref: 1151068) built c.1747 to be visible from Lady Mary's own home at Wortley. Both bastions were designed to give views to the south over the owner's deer park.</p> <p>The third C) from the Rotunda, Grade II* (1746) to the courtyard of Cold Bath Farm over the lost early C18th Cold Baths, was from later in the century. The baths survived until the mid C20th so were extant for over two hundred years.</p> <p>The fourth D) from Cold Bath Farm to Archer's Hill Gate, Grade II, (partly visible in photo 9) from the 1750's once the 2nd Lord Stafford built his 'Arcade' now known as Archers Hill Gate, c.1756.</p> <p>This final Vista D, which runs alongside the applicant's site, was important enough to be emphasised by an avenue of beech trees (O.S. maps 1st edit. 25" to mile 1897 and 1st edit. 6" to mile 1845) running between them. Individual trees remain close by.</p> <p>The site is in full view of Archer's Hill Gate which was designed as a set of three 'picture frames' from the gardens into the park. The central archway focuses on Keepers Pond, an ancient water body retained to reflect the sky up to visitors, with a contemporary earthwork outside, consisting of a</p>
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					<p>steeply elevated semicircle of land (providing a turning circle) on the park side of the archways. The westernmost archway provides views over the park to the hills and moorland beyond. The eastern archway has the most direct view of the applicant's site. It also has a contemporary ramp at an even gradient to allow easy exit to and from the gardens.</p> <p>This proposed new building will affect future landscape views : both 'public' from the permissive footpath between Hood Green and Stainborough, and 'private' along much of the southern side of the gardens for college staff, their students and garden visitors whose ticket income supports this historic garden and the parkland's upkeep.</p> <p>All these historic sightlines will be affected by the design, in particular its increased height, massing, amount of roof lighting and choice of new tree species. We consider the increased height and addition of roof lights, in particular to the east, north and to a lesser extent the west, will cause harm to the grade I listed gardens and park.</p> <p>As a result, we do not consider that the revised application has engaged with the historic landscape or managed to mitigate the harm its more substantial presence will cause to this unique South Yorkshire complex of historic assets. The Gardens Trust/YGT therefore continue to object strongly to this proposal.</p> <p>If your authority plans to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest stage possible</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer cc. YGT & Historic England (e-yorks@historicengland.org.uk)</p>
Kenwood	South Yorkshire	E20/0922	N	<p>PLANNING APPLICATION Demolition of Banqueting Suite and outbuildings, erection of a block of 7 apartments (Block A) with associated parking, landscaping and ancillary works (Resubmission of planning permission 19/02022/FUL). Kenwood Hall Hotel , Kenwood Road, Sheffield, S7 1NQ. RESIDENTIAL</p>	<p>CGT WRITTEN RESPONSE 23.10.2020</p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to the proposed development affecting Kenwood Hall which although not on the Historic England (HE) Register of Parks & Gardens is included in Sheffield City Council's UDP Policy Background Paper No 4 1997 and is a non-designated heritage asset. 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 historic parks and gardens, and is authorised by the GT to respond on GT's behalf in respect of such consultations.</p> <p>You will be aware of our letter of 18th July 2019 in response to the</p>

				<p>previous planning application, 19/02022/FUL.</p> <p>The site of this planning application and the current accompanying one; 20/03276/FUL Demolition of outbuildings, erection of 4 dwellinghouses with associated parking, landscaping and formation of access, is within the Nether Edge Conservation Area and Kenwood Character Area and covered by an 'Area' Tree Preservation Order No 274 2001. We are writing a separate but linked response to application 20/03276/FUL.</p> <p>Kenwood Hall is Sheffield's largest surviving private example, (as opposed to a public park), of the work of the nationally acclaimed designer Robert Marnock (1800-89). Marnock was commissioned by George Wostenholm, a successful cutlery manufacturer, to design the garden at Kenwood and also the layout of the surrounding residential development carried out by Wostenholm. Wostenholm started buying land in the area of Cherry Tree Hill in 1834, though he did not build Kenwood till 1844, by which stage Marnock was already involved. He produced a concept that provided both an immediate setting for the house and enabled it to be extended, so he did not include physical boundaries, though there were visual ones. The latter were helped by the lie of the land, the house being surrounded by a terrace to south and east. The levels of the main lawn were manipulated to provide for play, created as a sheltered bowl, with planting emphasising the contours and disguising abrupt changes in level. The kitchen garden was out of view to the west, hidden by vegetation, but with a southern and western aspect. Stables immediately behind the house were accessed with a separate service road, and they were hidden from view from the house by a rockery. This bank in front of the stable block was positioned in a way so that it screens the yard from the entrance of the house, but still enables a view of the roofscape that contributes to the grandeur of the setting of the house. (Unfortunately, the rock bank is to be removed in planning consent already given.)</p> <p>The main approach to Kenwood was from Cherry Tree Hill Road. There was a walk that connected with and surrounded the lake, where it followed the contours and provided long views to the city and the south, to Meersbrook Park, etc. This was the heart of the development that emerged with Marnock's continuous assistance over the next 30 or so years. This central part was secluded by the manipulated land form, that provided privacy from views nearby, but also enabled long distance views out. The area had not been defined, because it was intended to extend it, and Wostenholm indeed managed to acquire most of the land between Little London and</p>
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					<p>Brincliffe Edge. The Kenwood housing development was an early attempt and experiment in suburban housing.</p> <p>We would like to make further observations that relate to both the current planning applications:</p> <p>The Desk-based Assessment from ArcHeritage notes in Appendix 1 Gazeteer of Heritage Assets:</p> <p>“The garden has been reduced by housing development around the edges in the 1920’s and 1930’s and by extensions to the hotel in 1975 and the early 1980’s. However, the core of the garden survives and the views from the terrace are largely intact...” We very much support this assessment.</p> <p>The Planning Statement by DLP Planning Ltd dated May 2019 at 1.2 states that:</p> <p>“The site is a parcel of brownfield land containing existing built form and tarmacked car parking ...”</p> <p>However, it is evident from Fig1 2.1 that this is only a very partial assessment. Much of the site remains the historic garden which is not brownfield – it has never been built upon.</p> <p>“3.8 Landscaping is proposed throughout the site which will enhance the quality of the environment and the overall visual appearance of the development from within and outside the site boundary, whilst simultaneously providing a secure environment and no loss of amenity for immediate neighbours. 3.9 The proposed development will be accompanied by a Tree and Landscape Management Plan and a Landscape Strategy which will demonstrate how the proposals will create an attractive built and natural environment throughout the site.”</p> <p>As we know Kenwood is a historic garden site from one of the most influential 19th Century designers that still remains of significance with much of its planting relatively intact. The site should be conserved, not disfigured and damaged by seemingly ill- conceived plans.</p> <p>“7.6 The proposed homes will respond carefully and confidently to the challenges and inspiration provided by the special and precious setting of the historic buildings and idyllic gardens.”</p> <p>So, the gardens are recognised as idyllic but we would strongly refute that the proposals respond carefully and confidently to the challenges and inspiration; they are totally unsympathetic in massing, detailing, and overall design to both Kenwood and the Nether Edge Conservation Area.</p> <p>The Tree and Landscape Management Plan Scheme by FPCR Environment and Design Ltd at Plate 1 writes about the 18th Century and site called</p>
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					<p>Newton St Loe with clipped shrubs. But we are dealing with a 19th Century garden designed by the man who designed Sheffield Botanical Gardens and was its first curator. Marnock was the leading landscape designer in the Natural Style of the nineteenth century, made even more famous by his student William Robinson. While stating 18th century precedence on one side, the selection of plants does not adhere to this, and is primarily a 20th Century nurserymen’s range.</p> <p>The subject of this application, the Banqueting Suite - Proposed Block A – historically was the site of former greenhouses replaced by the Banqueting Hall c1958 and which has been unused for some time.</p> <p>We note the Heritage Assessment by Franklin Ellis Architects, at 6.0 Impact Assessment writes that for “Block A the setting of the Stable Block and Kenwood Hall will be affected and with potential impact. Although the new building will have a smaller footprint and set further back from the street”. We totally disagree that the detailing of the new building that is proposed to be contemporary and high quality, will have any sympathy whatsoever with the existing stable block and hall. It is seemingly a steel frame system building, that neither adds something of appropriate scale and form, nor beauty. It therefore does not accord with National Planning Policy regarding developments within a Conservation Area which should ‘conserve’ and ‘enhance’ the area nor with Historic Environment Good Practice in Planning Note 3 (second edition, 2017) ‘The Setting of Heritage Assets’. We have concerns that this application does not address your authority’s statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.</p> <p>We also note in the Sheffield Development Framework Core Strategy adopted March 2009 Policy CS 74 Design Principles the following: “High-quality development will be expected, which would respect, take advantage of and enhance the distinctive features of the city, its districts and neighbourhoods, including: c) the townscape and landscape character of the city’s districts, neighbourhoods and quarters, with their associated scale, layout and built form, building styles and materials; d) the distinctive heritage of the city, particularly the buildings and settlement forms associated with: iii) Victorian, Edwardian and Garden City suburbs.”</p>
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					<p>At 12.14 the Core Strategy writes of “...heritage and landscape issues that are most important for the city’s distinctiveness... this will mean respecting the scale, grain and context of the places in which development is proposed.... The character of the distinctive Victorian suburbs and old village centres is an important factor when weighing the requirement for higher density of development (see policy CS26).”</p> <p>In conclusion we strongly object to this planning application which in its present form will harm Kenwood Hall, the Nether Edge Conservation Area and the Kenwood Character Area.</p> <p>Yours sincerely Val Hepworth Trustee and Chairman Conservation and Planning cc. Historic England; Margie Hoffnung, the Gardens Trust</p>
Kenwood	South Yorkshire	E20/0923	N	<p>PLANNING APPLICATION Demolition of outbuildings, erection of 4 dwellinghouses with associated parking, landscaping and formation of access. Kenwood Hall Hotel, Kenwood Road, Sheffield, S7 1NQ. RESIDENTIAL</p>	<p>CGT WRITTEN RESPONSE 23.10.2020</p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to the proposed development affecting Kenwood Hall which although not on the Historic England (HE) Register of Parks & Gardens is included in Sheffield City Council’s UDP Policy Background Paper No 4 1997 and is a non-designated heritage asset. 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 historic parks and gardens, and is authorised by the GT to respond on GT’s behalf in respect of such consultations.</p> <p>We would like this letter to be read in conjunction with our letter of 18th July 2019 in response to the previous planning application, 19/02022/FUL. It is important that our response here is read in conjunction with our letter for the planning application 20/03258/FUL Demolition of Banqueting Suite etc dated 22nd October 2020.</p> <p>The proposed development is in the core of the Nether Edge Conservation Area and Kenwood Character Area. An area where in 1844 the development of a leading Victorian estate landscape commenced by positioning the proprietor’s own home and garden, Kenwood, in this part of Sheffield by the ‘most successful’ of the 19th century landscape gardeners, Robert Marnock (1800-1889). Marnock advised on the orientation of the house and he carefully re-shaped the land so as to create a bowl- shaped lawn, with glimpses of the surroundings, but principally secluded. The other interesting feature of this lawn was that it enabled views out across the Sheaf valley to the south, without seeing the middle</p>

					<p>ground that was intended as a housing development. This housing development was one of the early housing projects nationally that defined the notion of a suburban development. Marnock's approach re the setting of the proprietor's house and treatment of its immediate surrounds, enabled a flexibility to the treatment of the surrounding land, which was initially informally enclosed within the park, but could later be opened out. The central area was sacrosanct, this is where privacy was a priority, for the owner, friends and family. Despite it now being an hotel, this status of a single property has thus far been largely maintained. Now it being compromised as bits are sold off- the 'butcher method', as this was called in an analysis by Christopher Tunnard in 1938; different land owners close together would mean compromises to the general treatment of the landscape and ad hoc maintenance, for the individual, rather than considering the whole, i.e. an erosion of the site. These planning applications will result in this special place being forever harmed. In addition, we have concerns about the detail provided in these proposals that make it clear that the significance of this landscape is poorly understood. Proposals/ plans have been produced for an undulating part within the site with carefully sculpted landform, characteristic for Marnock's approach, but they do not respond to this in the proposals. The four proposed houses (Plot A-D), for example will require extensive re-shaping of the landform. There is probably a 4-5 metre level difference between the highest and lowest level here. It makes it difficult to understand the general elevations, which seem unaware of how this would make a coherent and believable representation; as if this is a drawing board exercise on a flat site only. If the drawings are really representative of what is proposed, rather than indicative, then this is a completely inappropriate approach that will greatly affect the historic designed landscape, and incurs further damage on the central area of the Kenwood estate.</p> <p>The site proposed for 4 dwellings is NOT a site of previous development as suggested in the planning proposal, (eg at Planning Statement by DLP Planning Ltd dated May 2019 at 1.2). The site includes part of the old kitchen garden with part of the shrubbery near the stable block but also significantly it is the site of a physically and visually important shrubbery that contained the central space of the layout. It is important in providing a backing to the main lawn to provide seclusion, as well as cleverly providing views out to the wider landscape, without being able to see the buildings in</p>
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					<p>the middle ground immediately south of the garden.</p> <p>In addition, the proposed buildings are in a faux-modernistic style that is completely incongruous within the environment here; they are totally insensitive and damaging in both their approach and execution.</p> <p>As we noted in our response to 20/03258/FUL, the planting precedent proposed is 18th Century (as stated from Newton St Loe), but we are working with the site of a garden laid out in the mid nineteenth century. Marnock was involved here from 1844-1876. He was the leading landscape designer in the Natural Style of the nineteenth century. The selection of plants is primarily a 20th Century nurserymen's range.</p> <p>In addition, the dense proposed development requires boundaries, proposed here as hedges, in a historic landscape that sought complete avoidance of such clipped plant material which was considered (by Marnock and Robinson) to be inappropriate at the time and would further add to the discordance and lack of congruity. The individual plots and glazed faux-modern elevations with the inevitable domestic infrastructure facing out across the bowl of lawn, will look totally out of place and damage the setting when viewed from Kenwood Hall, its terraces and the designed gardens.</p> <p>Similarly, the hard detailing proposed is standard 21st century detailing that pays no respect to the historic materials, many of which can still be seen on site; reconstituted stone blocks and resin bond gravel are inappropriate and incongruous.</p> <p>We note the Heritage Assessment by Franklin Ellis Architects, at 6.0 Impact Assessment Proposal 4 and disagree. There will be an impact on Kenwood Hall and we totally disagree with the mitigation.</p> <p>We also disagree with many of the points in 7.0 Summary including the final paragraph. The proposals will materially harm the heritage values and the setting.</p> <p>Design and Access Statement, August 2020, 5.3 New Housing Plots A, B, C and D. We are dismayed at the Concept Overview 5.3.1 which is completely inappropriate for Kenwood Hall and we are similarly dismayed at much of the rest of this section.</p> <p>We are concerned about the general nature of the proposals and how they promote both the car and are a continuation of a way of life that is unsustainable and out of touch with the times which requires drastic changes to combat global change and a requires a humanistic approach.</p> <p>We have been very pleased to hear about Kenwood Community Growers</p>
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					<p>who have renovated the old kitchen garden. This has been very successful and a welcome positive force particularly in these uncertain times. The vegetables grown are provided free of charge to Food Works for use in their kitchen at the Sharrow Community Forum. Green space of all kinds is so important for everyone and especially so now.</p> <p>We consider that the principle of development of this site for additional housing (Plots A-D) is inappropriate to the character of the site, it adversely affects the historic character and does not enhance nor protect the site as required by National Policy.</p> <p>In conclusion in our view this planning application (and 20/03258/FUL), is contrary to the requirements of the National Planning Policy Framework (NPPF Feb 2019) paragraphs 194, 196 and 197. We also have concerns that these applications do not address your authority's statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.</p> <p>The Gardens Trust and Yorkshire Gardens Trust strongly objects to this planning application.</p> <p>Yours sincerely Val Hepworth Trustee and Chairman Conservation and Planning cc. Historic England; Margie Hoffnung, the Gardens Trust</p>
Henham	Suffolk	E20/0892	II	<p>PLANNING APPLICATION Outline Application (All Matters Reserved) Replacement dwelling. Ilium House, Henham Park Estate, Henham NR34 8AN. RESIDENTIAL</p>	<p>GT WRITTEN RESPONSE 20.10.2020</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.</p> <p>We have looked at the online documentation and appreciate the work that has gone into preparing the Design & Access/Heritage Statement for the Grade II registered Henham park and garden. Planning permission has previously been obtained for various houses/new hotel within the parkland, so in principle we have no objection to the scheme. However, we would wish to reserve judgement until such time as greater details emerge as to the design of the new house are available and how it relates to the surviving Repton parkland.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>

Painshill Park	Surrey	E20/0870	I	<p>PLANNING APPLICATION Creation of car park to provide 337 spaces with associated hardstanding and landscaping and restoration and re-landscaping of existing car park. Painshill Park, Portsmouth Road, Cobham Surrey KT11 1JE. PARKING</p>	<p>CGT WRITTEN RESPONSE 02.10.2020</p> <p>The following comments are submitted on behalf of the Surrey Gardens Trust a member of the Gardens Trust which is the statutory consultee for Registered Parks and Gardens.</p> <p>The site for the proposed replacement car park is outside but adjoining the Register area across the River Mole. There is therefore no physical impact on the historic park. It seems unlikely that there will be any visual impact given the immediate topography and orientation of the historic park in relation to the proposed car park. However, the Council may wish to satisfy itself that there is no greater visual impact on long views from the higher levels of the historic park than exists for the present layout, especially given the compact, utilitarian grid proposed.</p> <p>Don Josey On behalf of Surrey Gardens Trust</p>
Charlecote Park	Warwicks hire	E20/0947	II*	<p>PLANNING APPLICATION Application to extend packhouse and cold storage facility. Old Pastures Farm, Stratford Road, Hampton Lucy, CV35 8BQ. AGRICULTURE</p>	<p>GT WRITTEN RESPONSE 29.10.2020</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.</p> <p>The above application would appear to be closely linked with application 20/01007/FUL for 243,171 sq m of polytunnels at Old Pastures Farm which the GT/WGT strongly objected to on 11th August 2020.</p> <p>Charlecote Park, a Grade II* registered park and garden (RPG) has a rich and varied history and has existed as an estate since before the 12th century. Its subsequent associations with important historic figures such as William Shakespeare, and later Capability Brown (from c1750 for the next decade or so), combined with its interest to many illustrious visitors such as Sir Walter Scott, and the American authors Nathaniel Hawthorne and Washington Irvine, brought its fame to a worldwide audience. There are extensive views westwards and north westwards towards the application site from both the Grade I listed house (built between 1551 and 1559-60) which stands on a level terrace on the east bank of the River Avon, and also from within its surrounding RPG. The West Park contains extensive areas of ancient ridge and furrow and the whole park is still managed as a deer park, as it was in Shakespeare's time. The westernmost boundary of the RPG is only about 150m distant from the edge of the application site, and the existing polytunnels, let alone any additional ones, already mar the principal north-westward view from the house and RPG. The erection of a</p>

					<p>massive new packing building (at a higher elevation than the polytunnels – Heritage Statement (HS) 4.13) approximately 10m tall and 100m long, next to the existing 6m tall building which is 75m long) imposes a significant additional blight onto the already compromised setting.</p> <p>The avenue to the west of the main house at Charlecote aligns with parts of the application site, and the setting and significance of this is already badly compromised by the presence of the polytunnels. We would be extremely concerned about the additional impact of this enormous building upon the setting and significance of the RPG and other heritage assets.</p> <p>The HS (4.10) states that ‘the designated parkland west of the River Avon is not accessible to the public’ and that the only assets where there is ‘potential inter-visibility with the site are Charlecote’s main house and its separate western terrace ... as well as from the western entrance to the Park.’</p> <p>Your officers will be aware that Historic England in its publication The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), pub 2nd Dec 2017, Part I – Settings and Views, mentions (p2) that the ‘contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.’ It goes on to say (p4) that ‘Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset’ and crucially in this instance (p2) ‘When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change.’ P5 concludes by stating ‘While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive.’</p> <p>The existing LVIA does not show views from within the RPG towards the site. Without such a document it will not be possible for your officers to determine the true impact of this proposal upon the designated heritage assets of Charlecote Park. We would urge the applicants to provide this information.</p> <p>The GT/WGT strongly objects to this application.</p>
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					Yours sincerely, Margie Hoffnung Conservation Officer
Denmans Garden	West Sussex	E20/0833	II	PLANNING APPLICATION Demolition of existing structures on-site & erection of 42 No. dwellings with access, parking, landscaping & associated works. This application is a Departure from the Development Plan. Land west of Fontwell Avenue, Fontwell Avenue, Eastergate PO20 3RX. RESIDENTIAL	CGT WRITTEN RESPONSE 08.10.2020 The site lies some 800m to the SE of Denmans Garden, which was added to the HE Register of Historic Parks and Gardens a few months ago with a Grade II designation. Registration is a 'material consideration' in the planning process, and also triggers specific elements of national planning policy, including consultation with the Gardens Trust. Sussex Gardens Trust (SGT) is a member of the Gardens Trust (GT) (a national statutory consultee), and works closely with the GT on planning matters; the GT has brought this application to the SGT's attention. Representatives of SGT have carefully reviewed the documentation submitted. The site is a considerable distance away from the registered area of Denmans Garden and the intervening field and road boundaries are strong with mature trees. Denmans Garden itself has similar screening on its eastern margin. Hence the proposals are unlikely to affect the significance of Denmans Garden and for this reason SGT does not object to the application, but neither does it support the application. Yours faithfully Jim Stockwell On behalf of the Sussex Gardens Trust. CC: The Gardens Trust
Scholemoor Cemetery	West Yorkshire	E20/0834	II	PLANNING APPLICATION Alterations to existing prayer hall area to incorporate bereavement services offices and porch to front. Scholemoor Cemetery, Necropolis Road, Bradford, West Yorkshire BD7 2PS. CEMETERY, BUILDING ALTERATION	CGT WRITTEN RESPONSE 07.10.2020 Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to any proposed development affecting a site included by Historic England (HE) on their Register of Parks & Gardens – Scholemoor Cemetery (grade II). 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. Scholemoor Cemetery was designed by the Borough Surveyor, Charles Gott and opened in 1860. The principal entrance lies at the centre of the southern boundary with a 6m wide drive leading northwards to the early 20th C crematorium designed by the Borough Architect, FEP Edwards. The main axial drive has symmetrical formal layouts to east and west. The Prayer Shelter is located within the cemetery adjacent to the Muslim burial area and was built in 1995.

					<p>We have been unable to find any details of the proposed landscape element: the new railings, the type of paving and the soft landscaping. Although we have no comments to make about the proposed alterations to the building which should be beneficial for the cemetery, we cannot comment fully without the specifications of the proposed landscape element.</p> <p>Yours sincerely, Val Hepworth Trustee and Chairman Conservation and Planning Cc. Historic England; Margie Hoffnung, the Gardens Trust</p>
Harewood House	West Yorkshire	E20/0847	I	<p>PLANNING APPLICATION and Listed Building Consent Retrospective application for a new flue to the kitchen roof. The Hovels, Weardley Lane, Harewood. MISCELLANEOUS</p>	<p>CGT WRITTEN RESPONSE 07.10.2020</p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to any proposed development affecting a site included by Historic England (HE) on their Register of Parks & Gardens – Harewood House Registered Grade I. 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 currently known as The Hovels lies within the Grade I Registered Park and Garden surrounding Harewood House and thus lies within a landscape considered to be of international importance. We understand the technical reasons for the requirement for and position of the flue, however we expect that once the use ceases that the flue should be removed and the roof made good.</p> <p>We would like to raise another matter connected with the development of The Hovels. We have noted that the new Plant Building is quite dominant in views and can also be seen from Otley Road to the north. In the 2018 application the proposed site plan, 2527466, indicated hedging around the proposed building, apart from the northern side, in order to reduce its impact as we discussed at the site meeting. However, you can see from Fig 1 paragraph 3.1 of the current Design and Access Statement that it appears that little or no planting appears to have been undertaken to provide screening and also the new timber appears to have not been treated to lessen its impact; the building is if anything more dominant than The Hovels development itself.</p> <p>In the Planning Officer's Report, 2018, it was stated: The new building was originally proposed to be located to the west of the</p>

					<p>Hovels, however following feedback from Historic England and Yorkshire Gardens Trust the building has been relocated to the north of the Hovels as it was considered that this location would have less impact on the views of the Registered Park and Garden and also less impact on the Hovels. The LPA do not consider the new building to have a negligible visual impact on the listed buildings nor the wider park landscape. Due to the nature, situ and scale of the new building it does not compete with the listed buildings. The plant room is proposed to be an agricultural style building, clad with black timber panels and a black corrugated metal panel roof. A condition is recommended to ensure the proposed materials are appropriate. We have been unable to find a document with a condition for the proposed materials.</p> <p>Yours sincerely, Val Hepworth Trustee and Chairman Conservation and Planning Cc. Historic England; Margie Hoffnung, the Gardens Trust</p>
Nostell Priory	West Yorkshire	E20/0860	II*	<p>PLANNING APPLICATION Variation of condition 1 of application 09/00668/FUL (Variation of condition 2 of application 04/99/04194/D to extend the permitted period of occupancy from 10 to 11 months approved 14th September 2009) to allow year round occupancy. Nostell Priory Holiday Park, Nostell Priory Estate, Nostell. MISCELLANEOUS</p>	<p>CGT WRITTEN RESPONSE 08.10.2020</p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to any proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. In this case the park, garden and designed landscape at Nostell Priory, which is registered Grade II*. 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>Nostell Priory's parkland is situated to the north, north-west and east of the house and retains elements of an early 18th Century scheme by Stephen Switzer and later 18th Century additions including lodges by Robert Adam. Adam designed Obelisk Lodge in 1776. It is situated on the highest point of the park overlooking the northern area of the parkland; Obelisk Park. To the west of Obelisk Park is located the caravan and camping site enclosed by woodland; Top Park Wood, and within the registered boundary. The caravan and camping site has been in existence for many years.</p> <p>We have no comments to make.</p> <p>Yours sincerely, Val Hepworth</p>

					Trustee and Chairman Conservation and Planning cc. Historic England; Margie Hoffnung, the Gardens Trust
Undercliffe Cemetery	West Yorkshire	E20/0942	II*	PLANNING APPLICATION Single storey extension to rear. 13 Undercliffe Old Road, Bradford, West Yorkshire BD2 4RQ. BUILDING ALTERATION	CGT WRITTEN RESPONSE 20.10.2020 Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development potentially affecting Undercliffe Cemetery, a site included by Historic England (HE) on their Register of Parks & Gardens, as per the above application, at grade II. 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. Undercliffe Cemetery which opened in 1854 was designed by William Gay and considered to be his finest work. The cemetery's eastern boundary is formed by Undercliffe Old Road, the site of this planning application and is within the Undercliffe Conservation Area. The proposed single- story extension to the rear built in natural stone with a slate finish roof should not be visible from the cemetery. We have no further comments. Yours sincerely, Val Hepworth Trustee and Chairman Conservation and Planning
Harewood House	West Yorkshire	E20/0961	I	PLANNING APPLICATION Installation of a tent structure to the courtyard of the stables at Harewood House. The structure will be in place for approximately 3 months of the year for the Christmas trading period. The Courtyard, Harewood House, Harrogate Road. MARQUEE	CGT WRITTEN RESPONSE 29.10.2020 Thank you for reconsulting The Gardens Trust in its role as Statutory Consultee with regard to any proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. In this case the park and garden at Harewood House is registered grade I. 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. We have no comments to make on this planning application which is a temporary structure until the end of January, and apart from anchor points in the paved surface should not affect the historic fabric of the stable block. We hope that the tent structure will add to the Christmas celebrations for the visitor to Harewood and that it will only remain for that period. Yours sincerely, Val Hepworth

					Trustee and Chairman Conservation and Planning cc. Historic England; Margie Hoffnung, the Gardens Trust
Hazelbury Manor	Wiltshire	E20/0918	II	PLANNING APPLICATION Proposal Agricultural Building that will house a 60 head dairy herd and 1 milking robot; Manor Farm, Wadswick, Corsham, Wiltshire SN13 0NY. AGRICULTURE	GT WRITTEN RESPONSE 03.10.2020 The Gardens Trust (GT) has just been made aware of the above application. We would have expected Wiltshire Council to have notified us of this due to our role as statutory consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. The planning site directly abuts and faces the eastern boundary of the Grade II listed Hazelbury Manor registered park and garden (RPG) as well numerous listed buildings associated with Hazelbury Manor itself (Grade I). We have liaised with our colleagues in the Wiltshire Gardens Trust (WGT) who have made a site visit on our behalf and their local knowledge informs this joint response. We were surprised that the application did not contain any kind of Heritage Statement, Design & Access Statement, or indeed a Visual Impact Assessment. The NPPF Para 189 requires applicants to describe the significance of any heritage assets affected, and nowhere within the online documentation is there any mention whatsoever of either the RPG or indeed any of the registered buildings and structures at Hazelbury. This lack of documentation also means that the application does not comply with the NPPF para 190 describing the effect the application may have on the heritage assets. Para 194 of the NPPF also has a bearing on this application, as in our opinion, the extremely large agricultural building standing 4.5m to the gutter level (there is no indication of roof height), will be very visible from within the RPG and therefore have a detrimental effect upon its setting and significance. Currently some deciduous trees partially mask the site in summer, but the bulk of these trees are ash which are likely to succumb to ash dieback within the foreseeable future, causing even greater harmful visual impact to the RPG. In addition, the application site is very visible from the Grade II battlemented tower on the NE end of the high rubble stone enclosing walls to North and West of Hazebury Manor and terrace in the west garden. Several respondents have pointed out the lack of detail about other necessary facilities and services to go with the care of the dairy herd which may have additional negative impact upon the heritage assets. Your officers will also be aware of Historic England's The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), pub 2nd Dec 2017, Part I – Settings and Views,

					<p>(SHA). In this document (p2) it states 'Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity' and this is clearly relevant here. P4 goes on to say : 'significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting'. P5 has two more relevant statements : 'While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive' as is clearly the case here. The site 'which is not part of the park or garden but which is associated with it by being adjacent and visible from it'. A busy and potentially growing dairy herd business, will affect the experience of the asset, particularly by (p11) 'Visual dominance, prominence ..; Noise, vibration and other nuisances'; adversely affecting 'Tranquillity, remoteness, 'wildness' ; with 'Busyness, bustle, movement and activity.'</p> <p>The applicant has clearly not appreciated the negative impact this agricultural business and associated facilities will have on the nationally significant heritage assets immediately adjacent and we would urge them to consider finding a less harmful site elsewhere within their large land ownership.</p> <p>The Gardens Trust and Wiltshire Gardens Trust OBJECT to the above application.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer</p>
WALES					
Llanrhaeadr Hall	Clwyd	W20/0006	II	<p>PLANNING APPLICATION Construct a Woodland Footpath, Steps, Weirs & Interpretation at St Dyfnog's Well, Llanrhaeadr.</p>	<p>WHGT WRITTEN RESPONSE 06.10.2020 Thank you for consulting with WHGT. The WHGT strongly objects to this planning proposal as it damages a rare and precious heritage. The historic and cultural values of this designed landscape are of much greater significance than this planning application appreciates. All built structures on this site are components of a historic landscape, located entirely within the revised boundary of the Grade II registered historic park and garden at Llanrhaeadr Hall PGW(C) 44 listed in the Cadw / ICOMOS Register of Sites of Special Historic Interest in Wales. This</p>

				<p>designation is missing from the Heritage Impact Assessment.</p> <p>The Picturesque woodland walk laid out along the stream leading to St Dyfnog's well was originally part of the pleasure grounds of the hall to which it is connected by a tunnel under the road.</p> <p>(Picturesque is the recognised style of landscaping introduced by William Gilpin into British cultural debate in 1782 in 'Observations on the River Wye, and Several Parts of South Wales etc.' This is a style particularly important to Wales and can also be seen at Hafod in Ceredigion and at Plas Newydd, Llangollen.)</p> <p>Any physical impacts on this unique and fragile Picturesque landscape are a cause for concern. The proposed transformation and redesign of the well site with new paving, sandstone steps, two weirs and interference of the tufa waterfall from the St Mair spring will adversely impact both the natural phenomena as well as the historic remains found at this site. The proposed work fails to conserve and enhance the significance of the site.</p> <p>Millicent Bant visited in 1806, recording in her diary that the well, "once famous for curing the rheumatism, now a mere ruin with a pleasant walk around it." (Pitman, 2009)</p> <p>The ruined well and pleasant walk need to be protected. The path to the well crosses over 3 small bridges to the well pool as part of the designed landscape. These need to be preserved. The Cymdeithas Cadwraeth Llanrhaeadr Y C Preservation Society seeks to reconstruct rather than conserve, restore or preserve this special site. Conservation in the twenty-first century recognises that history is irreversible, and that built heritage is irreplaceable and cannot be replaced by copies. The abusive reconstruction of the bridge nearest to the well pool last winter, in the wet season, prior to any planning application, damaged this fragile historic environment and caused two, if not three, further tree losses on the site. The rebuilt bridge is a very poor copy of the original and lacks any sense of authenticity. It is not faithful in form, it was crudely cemented, and the ugly large adjoining culvert has no place in the eighteenth, or early nineteenth century Picturesque landscape.</p> <p>Furthermore, it would be inappropriate to add turf capping to any of the bridges as there is no historic evidence or justification for any "carpet" (tapis vert) treatment of this landscape. The original design of the bridge has no edging. Minimal restoration should be applied to the remaining</p>
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					<p>bridges - any conservation should have no adverse visual impacts on these pretty historic structures.</p> <p>All new construction, especially the weirs, should be avoided as it will materially change and degrade the historic qualities of this site. The recent developing tufa waterfall, a rare phenomenon, should be protected. The new work would stand out and look incongruous, interrupting the historic and spiritual ambience of the well. Existing random stone about the site should be left where it is, as an intrinsic part of the historic landscape.</p> <p>Modern paving and sandstone steps around the well pool together with the two weirs, for which there is no historic evidence, would be imposing a 21st century design and water engineering on this landscape and detract from the natural phenomena which gave rise to the holy site.</p> <p>Alien materials such as sandstone and the greenish Criggion Stone from the Criggion Quarry in the Breidden Hills should not be introduced to the site.</p> <p>Paths should use a local material and relate to the style of the original parkland walks and to the setting of the grade I church. There is some evidence of an earlier stone path on the higher ground, but it may be the base of an elaborate earlier path constructed using multiple layers of crushed stone and gravel, with the coarsest material on the bottom, rising through more finely grained material at the top.</p> <p>If it is necessary to improve the pathway, a light touch and a sympathetic design is needed which would actually reach the well - which is the point of this path. The proposed board walk is inappropriate and would certainly not have been introduced to the original landscape.</p> <p>Setting the interpretation panel to the centre line of the path across the bridge No. 4 and perpendicular to the path through the woodland is aesthetically clumsy. Wayfinding along a single path of no more than 200 yards is unnecessary. Modern signage on wrought ironwork supports would be an unwelcome and out of character intrusion on this historic site.</p> <p>Certainly, no information panel should desecrate the rock wall above the well. Signage and information should be restricted to outside the site at the entrances - the normal practice of Cadw by ancient churches, such as at St Mary's, Caerhun on the site of a Roman fort above the River Conwy.</p> <p>The need for site safety information is not clear - no one has ever been recorded as having had an accident or drowned when visiting the well.</p> <p>Entrance information should indicate a short woodland walk with a gentle incline to the well. Those interested in the site should be able to access an App or find further information in the church including the detailed</p>
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					<p>research by Tristan Gray-Hulse and others.</p> <p>The outdoor classroom is an intrusion to the historic landscape behind the church. Local schools are nearby, and in Covid-19 times school visits from farther afield are unlikely. In normal times there is ample space to accommodate a school group within the church, where they should see the famous Jesse window. This site lacks toilet and parking provision for groups of any size.</p> <p>New entry gates/curtilage structures will create an unnecessary obstruction to this public right of way on the North Wales Pilgrims Way, particularly for wheelchairs and prams. There is no livestock to keep in or out and there is no historic justification for gates. The approaches should be low key and as close as possible to what was original to the site.</p> <p>It is contrary to the principles of conservation to impose a 21st century transformation and disturbance of this landscape. These proposals are contrary to the Historic Environment (Wales) Act 2016, intended to better protect listed buildings as they fail to enhance this site and fail to provide an authentic experience for people today and future generations.</p> <p>The proposed developments ride roughshod over the historic qualities and special ambience of this historic and holy landscape. The heritage values and spirit of the place will be severely damaged by the proposed works.</p> <p>Glynis Shaw (Welsh Historic Gardens Trust, Clwyd branch)</p>
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