

THE GARDEN
HISTORY SOCIETY

Planning Conservation Advice Note 5

Golf



GHS Head Office, 70 Cowcross Street, London EC1M 6EJ

Tel: 020 7608 2409 Fax: 020 7490 2974 Email: conservation@gardenhistorysociety.org

www.gardenhistorysociety.org

The Planning Conservation Advice Notes (PCANs) listed below have been devised by the Garden History Society to advise those wishing to determine the impact upon historic designed landscape of specific proposals for change. This includes local planning authorities, potential developers, owners or other interested parties. These PCANs seek to inform on necessary background information and good conservation practice while at the same time encouraging critical evaluation of the likely type and extent of potential impact. Not all impact is adverse, change is not necessarily detrimental, and opportunities do exist both for development and, where adverse impact has been identified, for appropriate mitigation. Informed evaluation is essential however, if irreversible damage is to be avoided and change is to be implemented in a way that is sympathetic to the historic and visual value of designed landscape.

Titles List

PCAN 1: Change of Use (of landscape, and of principal and/or subsidiary buildings)

PCAN 2: Hotel and Leisure Development

PCAN 3: Extension of Educational/Institutional Establishments

PCAN 4: Executive Housing

PCAN 5: Golf

PCAN 6: Vehicle Parking and Access

PCAN 7: Treatment of Boundaries and Entrances

PCAN 8: Telecommunications Masts

PCAN 9: Development of Domestic Amenities

PCAN 10: CCTV and Lighting

PCAN 11: Development in the Setting of Historic Designed Landscape

PCAN 12: Evaluation of New Landscape Features

PCAN 13: Briefs for Historic Landscape Assessments

PCAN 14: Management Plans (including Statements of Significance)

Appendix 1: Lists of subsidiary development generated by particular types of change

Appendix 2: General Evaluation Checklist (All types development/all types landscape)

Appendix 3: Planning Context

Planning Conservation Advice Notes 1 to 12 deal with some of the most common types of change proposed in historic landscape or its setting. Notes 13 and 14 describe documentation required to evaluate and support proposals for such change. Appendices 1 to 3, which separate out specific aspects of proposals in note form for quick reference, may also be useful for evaluation of types of change not covered in PCANs 1 to 12.

Format

PCANs 1 to 12 are divided into the following sections:

Section 1.0: Introduction

Section 2.0: Information Needed to Evaluate the Impact of Proposals

Section 3.0: Further Information Needed

Section 4.0: Potential for Mitigation

Section 5.0: Watchpoints

Section 6.0: Unavoidable Development/Damage

Section 7.0: Application of Advice

Section 8.0: Planning Context

Section 9.0: Evaluation

Evaluation

Most sections follow a set format but Section 9.0 on evaluation differs between various PCANs.

PCANs 3; 6; 8; 9; 10; 11 have a flow chart evaluation questionnaire. This may assist planning officers in particular, both in assessment of proposals and in preparation of recommendations for committee – the advice shown in upper case and bold type being intended to inform particularly on the following:

- level of potential impact
- further input which may be needed from other professionals
- further information which may be required
- where condition or legal agreement would be required to avoid adverse impact

PCANs 1; 2; 7 have checklists of questions intended to:

- highlight other relevant evaluation tools
- highlight potential implications of proposals
- list questions relevant to evaluation of impact

PCANs 4; 5 have short checklists of questions intended to:

- direct evaluation to specific conservation advice in the relevant PCAN
- assist evaluation by highlighting potential implications of proposals

PCAN 12 seeks to assist evaluators by offering conservation advice for particular situations.

Current status of advice notes

These planning conservation advice notes may be amended following trialling or with the introduction of new legislation. Any comments, and suggestions for improvement would be welcomed by the Society and feedback on content, usefulness, layout etc. of the sections on evaluation (including flow-charts) would be particularly appreciated.

Acknowledgements

Individuals and organisations too numerous to mention have been involved in various stages of preparation of these PCANs and the Society would like to acknowledge this invaluable assistance and to offer its thanks to them all.

The Society would also like to highlight the input of the Society's conservation team in place at the time the original concept was devised (David Lambert, Anthea Taigel, Kath Gibson, Sarah Couch and Linden Groves), with particular thanks to David Lambert for identification of subjects, Sarah Couch for invaluable advice and for her work on PCAN 14 and advice flow charts, Kath Gibson for invaluable advice, particularly on PCANs 1 and 7, and Linden Groves for her support and enthusiasm. The Society is also indebted to the Jubilee Fund Trustees who provided initial funding for 'pilot' PCANs, and to the GHS Conservation Committee, which has supported this initiative throughout, with particular thanks to John Sales who has provided the text for Statements of Significance (included in PCAN 14). Format and text of PCANs and Appendices were otherwise devised by Anthea Taigel (former principal conservation officer of the GHS), with the advice and guidance of Elisabeth Whittle, (Chairman of the GHS Conservation Committee).

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The majority of landscape in England today has been designed – for agriculture, domestic habitation, commerce or a multitude of other purposes. Areas for sport (such as golf courses) are also included within this definition of ‘designed’. However, the term ‘designed landscapes’ also has a special meaning reserved for those landscapes laid out with ornamental intention and managed, in whole or part, for aesthetic purposes. Use of the term ‘designed landscapes’ in GHS PCANs is in the latter context.

1.0 Introduction

- 1.1 Golf has been known since the 17th century, but for many centuries the game was largely confined to Scotland and the majority of courses in England were laid out in the 20th century. New golf courses are still being laid out and existing courses extended in the 21st century. The most common type of historic landscape which has been, and continues to be, affected by such use is that of the country house.
- 1.2 In respect only of the requirements of the sport and of commercial interests, country houses and the landscapes which lie around them offer significant advantages. The extensive areas of grassland, varied topography, water features and mature planting of landscape parkland can provide a ready-made ornamental framework for golf course layouts. Country houses may supply prestigious accommodation for club facilities and, on occasion, for associated hotel conversion. Maintenance facilities (storage for mowing equipment etc.) may be met by existing service buildings and areas, vehicular access to a mansion is usually both attractive and unobstructed, and seclusion and privacy have been fundamental to this type of landscape for generations.
- 1.3 For the neglected country house mansion without an identified use, association with golf may generate revenue for urgent repairs and necessary future maintenance. From the perspective of a planning authority, which must consider statutory requirements for preservation of a listed building, the potential for condition or legal agreement, tied to consent for golf course use, to meet such obligation may appear an attractive option. However, such requirement extends to preservation of the setting of listed buildings and, in this respect, use for golf can conflict directly with conservation aims.
- 1.4 Use of designed landscape (of any type – country house, asylum, public park etc.) for golf has serious drawbacks. The very specialised variations in topography required by tees, fairways and bunkers (the aptly-described ‘lunar landscape effect’) is in direct conflict with the smooth flowing contours of the majority of designed landscapes, and in particular with that of the English landscape park. Machine-mown strips and circles, interspersed by areas of ‘rough’ of unkempt appearance, bear no similarity to the uninterrupted grazed turf of parkland and the uplifted line of the canopy under mature parkland trees, formed by stock grazing and which thus closely follows and accentuates grassland contours, cannot easily be maintained. Moreover, narrow stands of ornamental species such as cherry, willow and silver birch (often planted to separate fairways) are alien to landscapes whose structure is formed by forest trees disposed as single specimens or clumps to frame a view or highlight a contour. The subsidiary development required in association with golf (see *GHS Appendix 1: A1.12*) is also usually extensive and is difficult to accommodate appropriately within designed landscape.
- 1.5 Apart from the substantial number of commercial golf courses constructed from the latter half of the 20th century onwards, the development history of designed landscapes includes a handful of small private courses laid out around the turn of 19th/20th centuries. Most of these remained exclusive to owners and selected friends before falling out of use when interest declined or maintenance became too onerous. A few were opened to a small number of carefully selected users (who generally played the course on an informal and irregular basis) before finally being abandoned, and a tiny minority survived to be absorbed within commercial undertakings.

- 1.6 Both the early private courses and the later commercial courses are of interest in terms of the history of sport and leisure, indeed it has been suggested that course layouts should be recorded before change, to ensure that such history is properly documented.

However, while such a course may be included within the development history of an individual designed landscape, a separate evaluation is required to determine whether it has merit in an aesthetic context (i.e. whether it can be deemed to make, or to have made, a positive contribution to character and appearance – ‘a new landscape design layer’), and thus whether its imposition might be regarded as a positive change which supports conservation aims, or a negative change which does not.

See *GHS PCAN 13: Briefs for Historic Landscape Assessments*

2.0 Information needed to evaluate proposals

- 2.1 Where proposals constitute **Enabling Development***, English Heritage advises that there should be a presumption against development which does not meet all of the following criteria:

- The enabling development will not materially detract from the archaeological, architectural, historic, landscape or biodiversity interest of the asset or materially harm its setting
- The proposal avoids detrimental fragmentation of management of the heritage asset
- The enabling development will secure the long term future of the heritage asset and, where applicable, its continued use for a sympathetic purpose
- The problem arises from the inherent needs of the heritage asset, rather than the circumstances of the present owner or the purchase price paid
- Sufficient financial assistance is not available from any other source
- It is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the heritage asset, and that its form minimises disbenefits
- The value or benefit of the survival or enhancement of the heritage asset outweighs the long term cost to the community (i.e. the disbenefits) of providing the enabling development.’

Enabling development and the conservation of heritage assets.

English Heritage, London. 2001

*Enabling Development may be defined as development that would normally contravene planning policy guidance and plan policies, but which is proposed in the context of funding essential repair and conservation of an important heritage asset.

Authorities will be aware of the extent and level of information required to assess whether the above criteria have been met.

- 2.2 A full historic landscape assessment (HLA) and conservation management plan (CMP) are desirable to underpin any proposed change to historic landscape. They are **essential*** where use for golf is proposed. This will allow constraints and opportunities for development to be examined on an area by area basis and will identify both potential for repair of the historic landscape in each area and the potential for appropriate mitigation of adverse impact.

Proposals should be justified in this context (e.g. decisions on design and location of site elements should flow clearly from the findings of the above work).

*The extent of landscape required for use in association with golf and the far-reaching implications for the historic landscape (from primary and subsidiary development; new landscape subdivision; altered management regimes etc.) preclude proper assessment of impact through register or inventory information alone.

See also *GHS PCAN 13: Brief for Historic Landscape Assessment*

GHS PCAN 14: Management Plans for Historic Landscape

- 2.3 Golf is commercially based and individual courses must be financially viable to survive. A long term strategy document or business plan* should accompany proposals, and should demonstrate that such viability is clearly achievable on the extent of provision proposed. Evidence of viability should also cover resource implications of any conservation gains on offer.

Failure to require this may result in applications for further facilities to generate additional income, often at an early stage, and planning authorities may then be placed in a difficult position, particularly where original consent was tied to conservation of heritage assets.

* See also 3.2.7. below

3.0 Additional information required

3.1 Clear identification of the extent of the available landholding is needed for examination of alternatives and their evaluation in respect of potential for mitigation.

Even where a proposal site is the only area of a historic landscape within the proposer's landholding, full information on the significance of the area in the context of the whole site (through a historic landscape assessment), and on its potential for repair should be available.

3.2.0 Golf use has extensive implications for historic landscape and a wide variety of issues require examination. Main issues are highlighted below; from which it will be seen that detailed evaluation is essential and that application in outline is inappropriate.

For all types and lengths of courses, it is recommended that the following information be available for proper evaluation and informed decisions:

3.2.1 Contour and surface changes

Information on proposed contour changes should be detailed and readily understandable (plans of existing and proposed contour lines rarely allow three-dimensional interpretation). Models of a landscape as existing and as proposed are useful if produced at a suitable scale, and photomontages which highlight contour changes from significant viewpoints and areas within the historic landscape or its setting should also be available. Information on proposed changes in surface treatment, and any changes in colour which would result, should be integrated into presentation of the above information (e.g. proposed sand or earth bunkers and areas where new grass species are intended).

See also 3.2.5 below

3.2.2 Change in management regimes

Information provided should allow detailed comparison to be made between the landscape management regimes which were required to maintain design intention historically (e.g. grazing of parkland, clearing vegetation from views and vistas, removal of invasive understorey, dredging of water bodies, mowing down of bankside vegetation etc.) and those proposed within any new layout. The latter should include details of different mowing regimes intended for various areas, and any new grassland species which would be introduced.

Information should also be available on proposed management of water across a landscape (i.e. how weirs, dams, sluices, dykes etc. connect with ornamental water features, and how it is proposed to maintain and manage the former to ensure appropriate water supply and levels in the latter).

3.2.3 Change in outline of water features

Where changes to the outline of water features (lakes, ponds, serpentine rivers etc.) are proposed, information should allow clear comparison between the outline 1 – as designed, 2 – as existing, and 3 – as proposed.

Differences which are apparent between 1 and 2 can result from prolonged periods of neglect – e.g. silting up of lakes; overgrowth of waterside vegetation; or more extensive encroachment by invasive species (e.g. carr formation), particularly where water levels have been allowed to fall significantly.

3.2.4 Planting

Information on the species, disposition and form of planting should allow detailed comparison to be made between historical design and layout, and that which is currently proposed (see also 5.6 and 5.7 below).

3.2.5 Irrigation

Requirements for artificial irrigation should be identified, and information provided on how the volume of water required is to be made available (together with confirmation that any requisite permissions for water extraction can be secured).

Proposals for golf courses, particularly those which host professional events and wish to maintain an optimum playing surface in all seasons, may include irrigation lagoons (open bodies of water stored for later use). On plan, such a lagoon will appear simply as a new area of water.

Advice on assessment of the appropriateness of this to an individual designed landscape may be gained through reference to *GHS PCAN 12: Evaluation of New Landscape Features*.

However, for fully informed decisions, information should be available on the proposed depth of such lagoon and potential variations in rate of water extraction, as well as on its location and surface area. Sequential photomontages, which show the lagoon at various stages in the extraction process may be helpful. See also 5.1 below.

3.2.6 Structures

Information on the size, form, location, and anticipated use of proposed structures should be available, together with identification of any associated development which would be required (e.g. access paths, hard surfaced routes for maintenance equipment, location of particular tees within a certain distance of a clubhouse, access for service and delivery vehicles etc.).

Where proposals are for change of use of existing structures see *GHS PCAN 1: Change of Use, Structures and Landscape*.

3.2.7 Vehicle parking and access

Information contained in a business plan (see 2.3 above) and/or justification statement should identify clearly the types, levels and frequency of vehicle parking and access which would be required*. This should show minimum and maximum levels and any anticipated seasonal variations.

*Proposed extent of membership and associated concessions – including numbers of permitted guests; proposed frequency of and numbers attending events and competitions; any proposed sales associated with the course etc. should be included.

Information should also include identification of any potential impact of vehicle parking and access on parts of the historic landscape or its setting which are not within the identified landholding.

For more detailed advice on information required for assessment: see *GHS PCAN 6: Vehicle Parking and Access*

3.2.8 Circuit and access paths

Golf courses are also accessed by pedestrians and low-powered vehicles for a variety of purposes (e.g. permitted public access; spectators at events; buggys used around the course; gang mowers etc.). Information should be available on the variety, frequency and intensity of such uses, on projected circulation patterns, and on surface treatment proposed. Comparative information on management of access and circulation should be part of examination of a site's development history – see 2.2 above.

3.3 The type of information required for evaluation of proposals for Golf Academies or short Practice courses is essentially the same as that for longer courses, although additional and subsidiary development is likely to be more limited. However, where consent granted to implementation of a practice course could create precedent for a full course, information should include assessment of the potential for the historic landscape to accommodate such further development.

Local authorities may be placed in a difficult position if consent were to be granted to proposals which can be deemed to have generated but not met any future development needs.

3.4 Refer also to:

GHS PCAN 1: Change of Use, Structures and Landscape

GHS PCAN 2: Hotel and Leisure Development in particular Section 3.0: Additional Information Required

4.0 Potential for Mitigation

The following comments should be read in the context of unavoidable development – See 6.0

4.1 Courses should be designed to avoid disruption (physical as well as visual) to significant features and areas of the historic landscape, both those which survive and those which require repair to conserve historic integrity and character.

These may include:

- Structural planting (e.g. parkland trees, clumps, avenues etc.)
- Areas of discrete design (e.g. pleasure grounds, ornamental groves etc.)
- Buildings and structures which make an important contribution (e.g. lodges, estate cottages, bridges, cascades etc.)
- Views and vistas (together with any focal points)

- Designed compositions (e.g. a temple viewed across a lake with a backdrop of woodland and foreground of smooth lawn).

However, opportunity may be identified (see 2.2 above) to integrate some features as hazards within a course (and thus reduce extent of obstacles which are unrelated to a historic layout).

- 4.2 Course designs which rely on existing (or repaired) elements and features of the historic landscape will have least adverse impact.
Similarly, where new elements are included within the course, adverse impact may be restricted by ensuring that their scale and character do not conflict with the historic design and layout (e.g. water features, planting etc.). See also 5.4 below and *GHS PCAN 12: Evaluation of New Landscape Features*.
- 4.3 Maintenance of trees in good health is a clear management requirement, but premature felling or radical tree surgery, may be avoided by imposition of a regular tree inspection regime.
Historically, individual branches might be secured/supported to prolong the desired form of a tree. Such option might be explored for veteran trees or those of special significance to the designed landscape.
See also 5.6 below.
- 4.4 Tree Preservation Orders and/or conservation area status may be considered to ensure that appropriate advice is available regarding future tree management.
- 4.5 If site topography is carefully assessed, opportunities may be identified for placement of bunkers which are visible only from the immediate vicinity (e.g. in existing depressions). Similarly, tees sited in an already level area, rather than banked out of a graded slope are likely to be less visually intrusive.
- 4.6 Materials for bunkers may be selected to minimise visual impact (e.g. turfed bunkers are usually preferable in parkland locations. Failing this, darker coloured or local earths may be substituted for the brightly-coloured sand with which golf courses have come to be associated).
- 4.7 Procedures which reflect historic grassland management may be incorporated within regimes for golf (e.g. areas of 'rough' under parkland trees may be cut at the end of a season to restrict development of invasive understorey). (see 3.2.2 above)
- 4.8 Maintenance of grassland species which are specific to a designed landscape is preferable to the introduction of alien species.
- 4.9 Where increase in extent of water features is desired, in some cases this may be achieved through improved management regimes (see above 3.2.2. and 3.2.3).
- 4.10 Where water storage for irrigation is required and tanks, lagoons etc. would result in adverse impact upon the historic landscape, consideration may be given to siting such facilities outside the historic landscape or its setting, and use of water bowsers. Extraction from boreholes may also be an option. Consideration may also be given to restriction in either the extent or the frequency of irrigation (e.g. on some courses, while tees may be kept in optimum condition, fairways may be excluded from irrigation regimes*).
*Good practice in water management suggests that irrigation should be limited where possible.

5.0 Watchpoints

- 5.1 Planning application in outline cannot properly address the wide range of issues which are raised by any proposals for use of historic landscape for golf (see sections 2 and 3 above). Full planning applications should therefore be submitted in all cases.
- 5.2 Historic landscape (in particular historic parkland) may survive extensive periods of neglect, provided that it is not compromised by irreversible damage and development. Independent evaluation is recommended where proposals are put forward in the context of an urgent and/or essential need to 'save' a landscape.

- 5.3 Where an authority is minded to grant consent to an application for golf use, it is recommended that a suitable condition be imposed to cover, or a S106 Agreement include, provision for any future change to the approved course layout to be subject to consent by the local authority and to be properly justified in respect of the historic landscape (see 2.2 above).
Potential conservation gain arising from a course layout which respects the historic landscape may be limited if later changes can be implemented without appropriate scrutiny.
- 5.4 To limit surface evaporation, irrigation lagoons may be designed with minimum surface area and maximum depth. As a season proceeds, and water is progressively extracted, ever greater areas of steep, bare banks become exposed; at the full extent often presenting the appearance of an active extraction pit or vast bunker. Maximum extraction is likely to coincide with seasons of greatest public use and access to a landscape, and the potential for adverse visual impact is significant.
- 5.5 Failure to secure requisite permissions for water extraction at an early stage (see 3.2.5 above), or over-optimistic assessments of water available, may result in later piecemeal proposals (when options are limited by course layout).
- 5.6 The spread when in full leaf of significant specimens or tree groups/clumps within or close to a course, and the potential extent of their future growth should be ascertained. Course layouts should allow for the designed outline of specimens/clumps to be maintained without premature felling or tree surgery which would compromise their form.
N.B. The area which will be required to allow uninterrupted growth of replacement specimen trees (as identified by landscape conservation management requirements) and, of additional space which may be required for establishment of new specimen trees in advance of loss of the old, should also be considered.
- 5.7 Where it is proposed to introduce new species into a historic landscape, form and location should be carefully assessed. Trees whose size or density in maturity does not match those of the historical framework, or which have a relatively short life-span, can visually fragment views and compositions, and undermine the structure of a designed landscape.
- 5.8 Where the development history of a site (as identified through a historic landscape assessment) suggests existence of areas of potential archaeological significance*, and changes in levels or contours are proposed, consider archaeological evaluation.
*Not all areas of potential archaeological significance in respect of designed landscapes, have yet been identified on county Sites and Monuments Records (SMRs).
- 5.9 The type and extent of structures proposed should fulfil requirements for the immediate and foreseeable future. Potential anomalies, such as clubhouses which are too small to accommodate events which are essential for projected revenue; storage available for maintenance or sports equipment but not both; and calculations which include revenue from sales with no area/structure dedicated to vending, should be recognised and rectified at an early stage.
- 5.10 Consider what permitted development rights consent to proposals would confer and whether such PDR would be likely to accord with conservation of the historic landscape. Where this is in doubt, an authority may consider removal of PDR in any consent which they might be minded to grant.
- 5.11 Views within and across historic landscape may change markedly in different seasons. Any evaluation of potential impact should take this into account.
- 5.12 The potential impact of overtly modern structures is likely to be greater on areas and views of historic landscape where no such imposition has occurred to date.

6.0 Unavoidable Development

Golf courses may be designed to take account of the need to preserve significant existing features of a historic landscape; to accommodate a level of landscape repair and to minimise adverse visual impact (see

section 4.0 above). Nonetheless, the fundamental requirements of such a course, together with the extensive additional and subsidiary development which it invariably demands, will always conflict with good conservation practice for historic landscapes (since new design is imposed primarily for commercial reasons and for the requirements of the sport, rather than arising directly from the needs of the landscape*).

*See also *GHS PCAN 12: Evaluation of New Landscape Features*

- 6.1 Where development for golf is deemed the only way of securing the future of a heritage asset**, **Enabling Development** calculations should be rigorously scrutinised and conservation gain should be clearly identified, and achievable (see also 5.2 above). Repair and future conservation management of the historic landscape, in the form of a comprehensive, long term conservation management plan, to be tied to a Section 106 Agreement**, should be secured as part of any consent granted to such enabling development.

**See 2.1 above and *Enabling development and the conservation of heritage assets*. English Heritage, London. 2001 (See also: *Policy Statement*. English Heritage, June 1999 and *Rescued or Ruined : Dealing with Enabling Development*. Joint Amenities Societies publication. June 1999.) The ability of a historic landscape to survive extensive periods of neglect, providing irreversible development is not implemented, should not be underestimated.

***Such plan should include proper scheduling of works, identification of timescale within which works are to be completed and arrangements for monitoring, arbitration in case of dispute, and identification of action which would be taken by an authority in such event. Authorities need to be aware of the resource implications of a long-term commitment to securing conservation gains on offer.

- 6.2 Where a particular site has been outlined in a Local Plan but reference is only to undefined sport and leisure use, alternatives to golf should be explored – with particular attention to comparison of potential adverse impacts upon the historic landscape of the various alternative uses. Where a Local Plan is specific to use of a site for golf and proposals are therefore difficult to resist, every effort should be made to mitigate against potential adverse impact and corresponding gain for the affected historic landscape should be secured as part of any consent which an authority may be minded to grant.

Since it is highly improbable that any authority would be able to reach a decision without reference to a proper conservation management plan (based on a full historic landscape assessment – see section 2 above) conservation gain may comprise appropriate funding for future conservation management – see 6.1 above. Should the level of potential adverse impact be high and conservation gain be limited by the extent of the landscape within an applicants control, conservation gain from project funding for other historic landscapes in the public domain (i.e. under planning gain) may be considered.

7.0 Application of Advice

- 7.1 Where proposals for a golf course on historic landscape cannot be justified in the context of unavoidable development, the Society would anticipate that the authority would refuse consent to the application.
- 7.2 Where proposals for a golf course are justified in the context of unavoidable development and where appropriate conservation gain would be secured as part of any consent which the authority may be minded to give, the Society would be unlikely to object in principle and would not anticipate consultation.
- 7.3 Should there be any doubt over establishment of proper justification or of appropriate conservation gain, we advise that a request be made via our London office* for the Society's regional conservation officer to discuss the case with the local authority. *Such request should be made to the Society's Conservation Casework Manager, at The Garden History Society, 70 Cowcross Street, London EC1M 6EJ.
Email conservation@gardenhistorysociety.org or telephone 020 7608 2409.

8.0 Planning Context

This section highlights some parts of government Planning Policy Guidance notes (general guidance on specific topics), which may be particularly relevant to applications for change on historic landscape. Further information may be accessed via the planning website (see 8.10 below).

PPG15: Planning & the Historic Environment

- 8.1 Para 2.24 instructs that 'planning authorities should protect registered parks and gardens in preparing development plans and in determining planning applications'.

Para 2.24 also confirms that the effect on a registered park or garden or its setting is a material consideration in assessing an application.

N.B. It is important to recognise the difference between setting of a listed building, which may comprise historic landscape, and the setting of the landscape itself, the evaluation of which involves a range of different issues. (See *GHS PCAN 11: Development in the Setting of Historic Designed Landscape*)

- 8.2 Para 2.16 notes that when authorities consider applications for planning permission or listed building consent for works which potentially affect a listed structure they should pay special regard to certain matters including the desirability of preservation of the setting of a listed building.
Para 2.16 also notes that, 'The setting is often an essential part of the building's character, especially if a garden or grounds have been laid out to complement its design or function' and para 2.17 continues, 'In some cases **setting** can only be defined by a historical assessment of a building's surroundings'.
- 8.3 Para 4.6 notes that **conservation area** '... designation may well ... be suitable for historic parks or gardens and other areas of the historic landscape containing structures that contribute to their special interest'.
Para 4.40 directs that, '... when considering whether to extend protection to trees in **conservation areas**, local planning authorities should always take into account the visual, historic and amenity contribution of trees'.
- 8.4 Para 2.24 notes that, 'Planning and highway authorities should also safeguard registered parks and gardens when themselves planning new developments or road schemes.'

PPG16: Archaeology and Planning

A significant number of historic parks and gardens (registered and unregistered) are included on county sites and monuments records (SMRs) either in their own right or as part of the setting of other monuments.

8.5 Section A: The Importance of Archaeology

A.3 instructs that, 'Archaeological remains should be seen as a finite and non-renewable resource Appropriate management is therefore essential to ensure they survive in good condition ... They are part of our sense of national identity and are valuable both for their own sake and for their role in education, leisure and tourism.'

8.6 Section B: Advice on the Handling of Archaeological Matters in the Planning Process

B16: **Development Plans.** '... Authorities should bear in mind that not all nationally important remains meriting preservation will necessarily be scheduled; such remains and, in appropriate circumstances, other unscheduled archaeological remains of more local importance. may also be identified in development plans as particularly worthy of preservation.'

B18: **Planning applications** 'The desirability of preserving an ancient monument and its setting is a material consideration in determining planning applications whether the monument is scheduled or unscheduled' '... Where local planning authorities are aware of a real and specific threat to a known archaeological site as a result of the potential exercise of permitted development rights (as set out in Schedule 2 of the Town and Country Planning Act General Development Order 1988) they may wish to consider the use of their powers under **Article 4** of that order (see also 8.11 below) to withdraw those rights and to require specific planning permission to be obtained before development can proceed'.

B21: **(b) Field Evaluations** 'Where early discussions with local planning authorities or the developers own research indicate that important archaeological remains may exist, it is reasonable for the planning authority to request the prospective developer to arrange for an archaeological field evaluation to be carried out before any decision on a planning application is taken.'

B22: 'Local planning authorities can expect developers to provide the results of such assessments and excavations as part of their applications for sites where there is good reason to suspect there are remains of archaeological importance If necessary, authorities will need to consider refusing permission for proposals which are inadequately documented'.

PPG17: Planning for Open Space, Sport & Recreation

- 8.7 Para 14: **Maintaining an Adequate Supply of Open Space And Sports And Recreational Facilities** – 'Parks, recreation grounds, playing fields and allotments must not be regarded as 'previously developed land' as defined in Annex C of PPG3.'

- 8.8 Para 17: **Developments within Open Space** ‘Local authorities should (i) avoid any erosion of recreational function and maintain or enhance the character of open spaces ...’
- 8.9 Para 31: **Sports and Recreation requiring Natural Features and Water** ‘... the visual amenity, heritage and nature conservation value of water resources should also be protected’.

Planning Website

- 8.10 The website of the office of the deputy prime minister (www.odpm.gov.uk) may be accessed for full information on the above PPGs and other relevant planning guidance e.g.
PPG13: Transport
Planning and Access for Disabled People: A Good Practice Guide

Permitted Development Rights

- 8.11 Local planning authorities may consider the serving of an Article 4 Direction to withdraw permitted development rights and to require specific planning permission to be obtained before development can proceed in a number of other situations (see 8.6 above).

Irrigation

- 8.12 Where dams are proposed to hold water for irrigation, regulations governing reservoirs (The Reservoir Act) may apply.

See also *GHS Appendix 3* for further parts of

PPG15: Planning and the Historic Environment

PPG16: Archaeology and Planning

PPG17: Planning for Open Space, Sport & Recreation

AND *Planning Policy Wales*

9.0 Evaluation of Impact

For reasons outlined above, the laying out of golf courses is an inappropriate use of historic landscape (see 1.4 and section 6.0 above). Such development will result in damage and in loss of areas of the designed landscape. The extent of damage and of loss will depend upon the individual landscape; the extent, form and location of a course layout; and the potential for minimising adverse impact. Identification of the full extent of potential adverse impact is critical to proper evaluation of such proposals and the following list is designed to highlight main issues. There is no flow chart for this Planning Conservation Advice Note but evaluators should follow flow charts of other planning conservation advice notes, where indicated.

9.1 Type of Application

Is application in full or outline (see 3.2 and 5.1 above)?

9.2 New or Extended Courses

Are proposals for extension of an existing course or for a new course?

If proposals are for extension (or for development of a practice course into a full course) and development is unavoidable (see 6.0 above), is there potential for improvement of the existing course within the application (e.g. where a full CMP did not underpin original proposals can this now be revisited and damage rectified)?

9.3 Setting of the Historic Landscape

Would the proposed course be within the historic landscape or within its setting?

Where the course is within the setting of the historic landscape

Follow *GHS PCAN 11: Development in the Setting of Historic Landscape* **and consider**

Would any subsidiary development be within the historic landscape e.g. would access be across it, would there be any changes to boundaries and entrances, would signage, lighting or security measures be required within the landscape itself?

Are there any associated proposals for the historic landscape itself (e.g. conversion of mansion to hotel, conversion of parts of landscape to other leisure development)?

9.4 Justification for Proposals

What is the justification for proposals?

Where use for golf is put forward in the context of enabling development (see 6.1 and 8.0 above)

Does such enabling development relate to listed buildings only?

Does such enabling development relate to the historic landscape?

- In its own right (i.e. is the enabling development required to repair and conserve the historic landscape) – see 5.2 above
- Only as the setting of a significant listed structure

Where such a use appears to be supported by the local plan (see 6.2 above)

- Is golf the only use specified?
- Is the size of a course defined?
- Is a particular area of the Historic Landscape specified for golf use?

9.5 Course Location

What areas of the historic landscape would the course cover?

Is there a comprehensive conservation management plan for this historic landscape?

Does this support the area chosen as being the least damaging?

9.6 Information on Proposed Changes

Have the following aspects of proposed changes been fully explained?

- Contour and surface changes (see 3.2.1 above).
- Changes in management regimes, including water management (see 3.2.2 above)
 - In particular, has sufficient information been provided to allow comparison between historical land management regimes and proposed land management regimes?
- Changes in the outline of water features (see 3.2.3 above).
- Changes in planting (see 3.2.4, 5.6 and 5.7 above)
 - In particular, does the course layout allow for future growth of all significant planting (and of its staged replacement) without premature felling or tree surgery which would compromise form)?

- Irrigation requirements and how these will be met (see 3.2.5, 5.4 and 5.5 above).
- Changes in use of structures (see *GHS PCAN 1*, and 3.2.6 and 5.9 above)
 - In particular, does the course layout respect the designed setting of listed buildings and structures?
 - Have unlisted buildings and structures of importance to the designed landscape been identified?
 - Does the course layout respect the designed setting of these additional buildings and structures?
- Requirements for vehicle parking and access (see 3.2.7 above).
- Requirements for circuit and access paths (see 3.2.8 above).

Do proposals accord with good conservation practice in respect of the above?

Does the course layout respect identified important features and elements of the designed landscape?

9.7 Potential for Mitigation of Adverse Impact

Is there potential for mitigation of adverse impact? – see section 4.0 above and follow relevant PCANs as below:

PCAN 1: Change of Use (of landscape, and of principal and/or subsidiary buildings)

PCAN 2: Hotel and Leisure Development

PCAN 6: Vehicle Parking and Access

PCAN 7: Treatment of Boundaries and Entrances (e.g. visibility splays, signage, furniture)

PCAN 9: Development of Domestic Amenities (tennis courts, swimming pools, garaging, equine facilities)

PCAN 10: CCTV and Lighting

PCAN 11: Development in the Setting of Historic Designed Landscape

PCAN 12: Evaluation of New Landscape Features

9.8 Implications of Grant of Consent to Proposals

If consent were to be granted to these proposals:

- What permitted development rights would this confer? (See 5.10 above)
 - follow:
 - GHS PCAN 1: Change of Use* (landscape, and principal and/or subsidiary buildings)
 - GHS PCAN 2: Hotel and Leisure Development 9* (See in particular 5.4)
- Could it set a precedent/generate requirement for further works (See 2.3 and 5.9 above)
 - In particular, is there a sound financial base to proposals?
- Would future changes to course layout need to be approved by the local authority (See 5.3 above)?
- Would the future conservation management of the historic landscape be secured?
 - Has a timescale within which works are to be completed been agreed (See footnotes to 6.1. above)?
- Is the planning authority confident that resources will continue to be available to adequately monitor agreed conservation gains (See footnotes to 6.1. above)?
- Has a course of action been agreed and arbitrators identified in case of dispute over implementation of conservation works (See footnotes to 6.1. above)?

CHECKLIST OF DEVELOPMENT and SUBSIDIARY DEVELOPMENT (see *GHS Appendix 1*)

A1.12 Golf

- Contour changes (tees, fairways and bunkers)
- Planting (ornamental, short-lived trees e.g. cherry, willow etc.)
- Club houses (new structures, e.g. where a mansion is not within ownership or tenancy)
- Vehicle parking and access
- Removal of large areas of grass and replacement with sand lined bunkers
- Changes in outline of water features
- Altered management regimes for grassland
- Inappropriate or premature tree removal or pruning (health and safety – needs of the drive)
- Inappropriate management of mature parkland trees (e.g. where areas of rough are designed under parkland trees, developing understorey may compete with requirements of the trees)
- Irrigation requirements
- Maintenance buildings
- Conveniences (on large courses, such facilities may be required around the course)
- Access around and within a course for golfing buggies (hard or reinforced surfaces and paths)
- Alien grass species (colour change)
- Loss of grazing lines under parkland trees
- Buggy and golf equipment stores