



### CONSERVATION CASEWORK LOG NOTES MARCH 2018

The GT conservation team received 136 new cases in England and TWO cases in Wales during February, in addition to ongoing work on previously logged cases. Written responses were submitted by the GT and/or CGTs for the following cases. In addition to the responses below, 47 'No Comment' responses were lodged by the GT and 5 by CGTs in response to planning applications included in the weekly lists.

Site	County	GT Ref	Reg Grade	Proposal	Written Response
<b>ENGLAND</b>					
Bristol Local Plan	Avon	E17/1570	n/a	LOCAL PLAN Bristol Local Plan Review	<p><b>CGT WRITTEN RESPONSE 31.03.2018</b></p> <p>We are grateful for the opportunity to comment on this Local Plan Review.</p> <p>As previously notified to you, The Gardens Trust, which is the statutory consultee on matters concerning registered parks and gardens, is now working closely with County Gardens Trusts, and the responsibility for commenting on Local Plan Reviews in this context has now passed to Avon Gardens Trust.</p> <p>The Trust notes that Policy BCS22 Conservation and the historic environment in the Core Strategy of June 2011, and Policy DM31 of the Site Allocations and Development Management Policies of July 2014 are proposed to be retained.</p> <p>The Local Plan Review consultation document makes a number of strategic proposals, for example to meet housing need, to provide new transport infrastructure, and in respect of employment, land. Such proposals may, depending on location, detailed siting and design, have an impact on registered and unregistered historic parks and gardens.</p>

					<p>The Trust does not seek to comment on such proposals at the present time, but would expect to be engaged in its role as statutory consultee as and when the details of such proposals are known.</p> <p>The Trust also notes the wording of section 6.2, 'New Protection for Open Space', and Proposals HW3 and HW4 regarding Specially Protected Local Green Space and Reserved Open Space respectively.</p> <p>The Trust would like to be involved in the consultation on proposals for Specially Protected Local Green Space and Reserved Open Space later in the year which is mentioned at section 6.2.6 of the Local Plan Review consultation document and we would be pleased if you could send us further details of this at the appropriate time.</p> <p>The Site Allocations and Development Management Policies Map 2014 is not part of the current Review although there are now errors in the Map, with regards to the boundaries and annotations relating to some nationally important registered and parks and gardens and locally important ones. The Trust request that this 2014 Map should be checked and updated as part of a further review of the Local Plan, in order to ensure clarity for any proposed allocations and within the development control process.</p> <p>Yours faithfully, Ros Delany (Dr) Chairman, Avon Gardens Trust</p>
Stoke Park	Avon	E17/1583	II	<p>PLANNING APPLICATION Outline application for demolition of existing buildings/structures and comprehensive redevelopment comprising up to 268 dwellings (Use Class C3) including affordable homes, vehicular, pedestrian and cycle access from Romney Avenue and Hogarth Avenue, car parking, public open space, landscaping and other associated works. Approval sought of Access and Layout. (Major Application). Romney</p>	<p><b>CGT WRITTEN RESPONSE 15.03.2018</b></p> <p>Thank you for consulting The Gardens Trust about this outline application for the approval of the access and layout of a residential development which could affect Stoke Park, an historic designed landscape of national importance included by Historic England on the Register of Parks and Gardens of Special Historic Interest at Grade II. As previously notified to you, The Gardens Trust, which is the statutory consultee for development likely to affect registered parks and gardens, is now working closely with the County Garden Trusts to comment on planning applications and fulfil this statutory role. For further information, we refer you to The Gardens Trust publication The Planning System in England and the Protection of Historic Parks and Gardens (2016), which is available online: <a href="http://thegardenstrust.org/conservation/conservation-publications/">http://thegardenstrust.org/conservation/conservation-publications/</a></p>

				<p>House, Romney Avenue, Bristol BS7 9TB. RESIDENTIAL</p>	<p>The Avon Gardens Trust is a member of The Gardens Trust and is responding on behalf of The Gardens Trust to this consultation. Stoke Park is a nationally important landscape because it is a well-documented, rare completed example of a work by a leading eighteenth century landscape gardener, architect and general polymath, Thomas Wright. Laid out between 1748 and 1766 it is a prime example of a park of the eclectic Rococo period in English landscape history.</p> <p>The proposed residential development is on former agricultural land abutting Stoke Park on its north-west side. The boundary of the registered landscape and Park is the field boundary shown on the 1880s OS Map in the Heritage Statement. A cycle path now runs along this boundary outside of the Park.</p> <p>A visit to the site has been made to see the belt of trees and scrub in the Park which the Statement says would screen the residential development from view from within the Park. This belt of deciduous trees narrows towards the Cheswick Village end where there is a gap in the trees where pedestrians have made an access into the Park. As a result there are views both into and out of the Park. The photograph on page 8 of the Statement shows the adjoining houses in Cheswick Village which face onto the Park are visible from within the Park in the winter when the trees are not in leaf. This would also be the case with the proposed development, although the visual impact of the houses on the Park would be less due to the orientation of the two closest terraces of houses at right angles to the Park either side of the open space of the linear public park.</p> <p>The Bristol Local Plan Policy DM31 says that “Development will be expected to have no adverse impact on the design, character, appearance or settings of registered historic parks and gardens.” The Stoke Park Conservation Management Plan Consultation Draft 2016 also recommends that “All adjacent development should seek to preserve or enhance the setting and significance of the registered landscape” (6.6.4).</p> <p>Para.134 of the National Planning Policy Framework says that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be</p>
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					<p>weighed against the public benefits of the proposal, including securing its optimum viable use.”</p> <p>We consider that the proposed residential development as shown on the submitted Site Plan would have limited visual impact on the setting of the registered historic landscape of Stoke Park and have less than substantial harm to its significance. Consequently we raise no objections to this application.</p> <p>Yours sincerely Ros Delany (Dr) Chairman, Avon Gardens Trust</p>
Woburn Abbey	Bedfordshire	E17/1588	I	<p>PLANNING APPLICATION a) the demolition of 1970's visitor entrance buildings and construction of new visitor facilities and associated landscaping, including the reinstatement of areas of the Wyatville garden; b) the demolition of the Duchess tearoom and re-landscaping of the former 'drying grounds' and c) refurbishment and alterations to the North and South Courtyards. Woburn Abbey, Woburn Park, Woburn, Milton Keynes MK17 9WA. VISITOR FACILITIES</p>	<p><b>CGT WRITTEN RESPONSE 21.03.2018</b></p> <p>Alterations to the external landscaping to the Grotto Garden including the removal of 20th century concrete paving and the two 1970's entrance doors into the Abbey, followed by reinstatement of the masonry; the removal of the plate glass to the Grotto arches to be replaced with new metal doors in addition to works to reinstate the 17th century interiors in the Grotto Chamber and Green Parlour, including a new staircase and reinstatement of the tapestries and wall panelling; the removal of a 1950's staircase and installation of a new platform lift; the removal of a 1960's staircase and reinstatement of the Long Gallery and other minor internal alterations and removal of 20th century interventions.</p> <p>Bedfordshire Gardens Trust is responding to these associated applications on behalf of the Gardens Trust, statutory consultee for planning applications affecting registered historic parks and gardens. In the case of the application for listed building consent, our response relates to the landscaping of the Grotto Garden, the work to the Grotto arches and the proposal that the Grotto should become the visitor entrance to the Abbey. It does not appear that the remaining works would affect the registered site, or views from the house into the gardens and park.</p> <p>We welcome the proposals in 18/00731/FULL for the entrance buildings, which would greatly improve the area and the transition from it into the gardens. The opportunities for better visitor orientation at the new building, and for fully-accessible exhibition space within the north courtyard buildings, would also help to enhance understanding of</p>

					<p>the site for all visitors. Although this part of the grounds was never intended to be seen by the public until the 20th century, it is now important in giving visitors a sense of arrival in a place where the historic environment is respected, and the removal of the Duchess's Tearoom and other 1970s structures would enable this area to return to something closer to its earlier more open appearance. We do not believe that the significance of this part of the registered site would be harmed.</p> <p>Repton's 1804 plan for the area to the north and east of the Chinese Dairy, where the emphasis was on the view towards the Chinese Dairy Pond, was not carried out. The proposals to install intricate small-scale landscaping on the lines of the 1833 Wyattville plan for that area, are a departure from the series of Repton features which have been reinstated or created elsewhere in the gardens, but would not detract from them provided that the view to the Pond remains open.</p> <p>In 18/00740/LB, the recognition of the rarity, significance and value of the 17th century Grotto is also very helpful, supported as it is by David Adshead's detailed study of its origins and the changes over time to the three arched openings. The removal of the laminated glass infill panels and provision of metal doors with suitable glazing will do something to return it to a more appropriate state. We have no comments on the changes to the paving outside the Grotto, and the removal of the tarmac pathway to the east of the Grotto garden, and the late 20th century steps outside the Grotto chamber, are to be welcomed.</p> <p>Making the Grotto the proposed new visitor access to the Abbey will enable it to be seen to much more effect than the present route across it at the end of the visitor tour; but it has little to do with the way the Grotto would have been experienced historically (as far as is known) as a place of mysterious watery shade and a retreat from excessive summer heat. That should be made clear in any interpretative material, and care should be taken that the proposed lighting installation and any other works do not damage the fragile and beautiful interior.</p> <p>Yours sincerely  CAROLINE BOWDLER  Bedfordshire Gardens Trust  Conservation</p>
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Woburn Abbey	Bedfords hire	E17/1614	I	<p>PLANNING APPLICATION</p> <p>Alterations to the external landscaping to the Grotto Garden including the removal of 20th century concrete paving and the two 1970's entrance doors into the Abbey, followed by reinstatement of the masonry; the removal of the plate glass to the Grotto arches to be replaced with new metal doors in addition to works to reinstate the 17th century interiors in the Grotto Chamber and Green Parlour, including a new staircase and reinstatement of the tapestries and wall panelling; the removal of a 1950's staircase and installation of a new platform lift; the removal of a 1960's staircase and reinstatement of the Long Gallery and other minor internal alterations and removal of 20th century interventions. Woburn Abbey, Woburn Park, Woburn, Milton Keynes MK17 9WA.</p> <p>REPAIR/RESTORATION</p>	<p><b>CGT WRITTEN RESPONSE 21.03.2018</b></p> <p>See above</p>
Wotton Underwood	Buckinghamshire	E17/1520	I	<p>PLANNING APPLICATION Erection of an indoor Hydrotherapy Pool. Beechwood House, Wotton Underwood, Buckinghamshire HP18 0SB. SPORT/LEISURE</p>	<p><b>GT WRITTEN RESPONSE 09.03.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. We have liaised with our colleagues in the Buckinghamshire Gardens Trust (BGT) and would be grateful if you could please take our comments into consideration when deciding this application.</p> <p>The GT/BGT note that the proposed new building is to the rear of the</p>

					<p>property in the garden which backs on to the registered parkland. However, we acknowledge that this is the most discreet part of the registered garden and the structure would not be visible from the main approach drive to the main house or in views from the main house. We welcome the fact that it is a single storey construction with feather-edged boarding with a brick plinth at the lower level and has no windows or fenestration on the east, park-facing elevation. We would like to suggest that the structure might be more acceptable if it could be partially sunk into the ground or if there could be screening with appropriate 18th century evergreen species on the registered park side of the structure.</p> <p>Yours sincerely, Margie Hoffnung Conservation Officer The Gardens Trust</p>
Kedleston Hall	Derbyshire	E17/1524	I	<p>PLANNING APPLICATION Six covered driving range bays with teaching and analysis studio and re-use and extension of existing stoned area to form informal parking facility. Kedleston Park Golf Club, Kedleston Road, Kedleston, Derby, Derbyshire DE22 5JD.</p>	<p><b>GT WRITTEN RESPONSE 29.03.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT), formerly the Garden History Society, in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens (RPG), as per the above application. The GT has studied the deposited documents online and others submitted previously by the Kedleston Golf Club as part of its pre-application discussions with us and other statutory consultees. The Gardens Trust strongly objects to the proposed development. The proposal is for a covered golf driving range and two associated car parking areas, immediately adjacent to the eastern boundary of the Historic England Grade I Registered Kedleston Park. The proposed development site is also located some 313m away from the Grade II* Listed Kedleston Hotel on the east side of the Kedleston Road, which immediately overlooks the site. This was built c.1760-2 to a design by the architect Robert Adam, at a time when he was also working at Kedleston Hall itself. A Grade I Registered Park &amp; Garden designation by Historic England means that Kedleston Park is considered to be of exceptional interest. This is the highest possible designation as a heritage asset of this kind. To put this in context, of 1664 Registered Parks &amp; Gardens included on</p>

					<p>the Historic England List, only 145 (8.7%) are Grade I. Kedleston Park is thus recognised as being of the highest importance and value within the heritage and planning system, as defined by the National Planning Policy Framework (NPPF).</p> <p>A Grade II* Listing designation by Historic England means that the Kedleston Hotel is considered to be a building of particular importance and of more than special interest. As above, only 5.8% of all Listed Buildings in England are Grade II*. Kedleston Hotel is also therefore recognised by the planning system as of high value and importance. Our objections to the proposed development are based on the following:</p> <p>1) The scale of the proposed building development</p> <p>The proposed driving range building itself is to be timber built and clad, with a roof of 'profiled steel roof panels' painted VanDyke Brown RAL 8104, constructed on a single level concrete pad.</p> <p>Dimensions of the building as given are 24.9m (81.7 ft) long, by 5.0m (16.4 ft) wide at its narrower end and around 7.05m (23.16 ft) wide at the teaching bay end. The proposed height varies from 3.0 m (9.8 ft) at the rear, to 4.05 m (13.3 ft) at the front.</p> <p>This is a substantial structure covering an area of some 149.1m<sup>2</sup>, which goes some way beyond the apparently innocuous '...simple, timber structure, bolted to a concrete pad...' or the '...simple unassuming style of the building, its rustic material and its ephemeral character...' that is described in the Heritage Impact Assessment (HIA) submitted as part of the Application. The rear of the proposed structure is 3.0m tall, while at the front at 4.05m, it will be roughly as high as the eaves of a two-storey building.</p> <p>In order to represent fully the true scale of the proposed structure, Figure 1 below is an annotated extract from the Applicant's Proposed Plan and Elevations as submitted, with the red bar indicating the height of a 6ft (1.8m) high person.</p> <p>Figure 1: Annotated extract from the Applicant's Proposed Plan and Elevations, with the red bar indicating the height of a 6ft (1.8m) high person.</p> <p>Overall therefore, the proposed structure is likely to have a significant, detrimental visual impact, with the added industrial appearance of the</p>
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					<p>profiled steel roof cladding as described above, as well as the asymmetrical single-pitched roof. Additional images of existing similar structures are included in Annex 2.</p> <p>2) The scale and extent of excavations required for the proposed building development</p> <p>As outlined above, the proposed structure will cover an area of around 149.1m<sup>2</sup>, with an overall length of 24.9m. It is proposed to sit this on a single level concrete pad of 200-300mm thick, excavated into the existing ground level, with a sub-base beneath.</p> <p>No levels have been provided for the proposed location, but it is known to slope from north east to south west, which is similar to the proposed building orientation. It is likely therefore that the excavations required to produce a level base for the proposed building will be substantial, causing extensive and irreversible damage to the site and further compromising the Setting of the Registered Park and Garden.</p> <p>3) The proposed car parking areas</p> <p>Two (not one, as stated in the HIA) car parking areas are proposed, as part of and to service the proposed development.</p> <p>It is unclear why these facilities are found to be necessary. The car park adjacent to the Kedleston Park Golf Club House provides around 100 car parking spaces and golfers are by definition capable of moving around the golf course. The introduction of the car parking areas into the proposed development area will extend the area and effectively double the impact of the proposed development. It is no comfort at all to read in the HIA that it is proposed the car park will be used only during daylight hours .</p> <p>No meaningful plans are given for either of these proposed car parks and construction details are scant, although the HIA states that it will be ‘...a relatively modest patch of stone chippings...’ . In keeping with its generally partial tone, the document seeks also to minimise the likely visual effect of this significant aspect of the proposed development .</p> <p>4) The immediate proximity of the proposed development to the Kedleston Park Registered Park and Garden boundary and its likely negative effects on its Setting</p> <p>The Heritage Impact Assessment notes that the proposed development site is adjacent to the Kedleston Conservation Area, which boundary</p>
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					<p>‘...broadly follows that of the Park’ . In Section 5: ASSESSMENT however, it similarly states that ‘...The practice range...is seen against the backdrop of a large golf course which has been operating since 1947...’.</p> <p>Two points can be made regarding the above statements:  Firstly, they appear to be suggesting that the existence of the golf course negates the reality of the Grade I Registered Park and Garden (RPAG) within which it is located. This is not the case – the golf course is located within the boundary of the Kedleston Registered Park and Garden, as well within the Kedleston Conservation Area;  Secondly, they clearly accept the visibility of the Registered Park and Garden, when viewing the proposed development.</p> <p>Given the scale of the proposed structure and its close proximity to the Park boundary therefore, it is highly likely that it will have a damaging effect on views from and to the Registered Park and Garden, which were and remain an integral part of its design. It will also have a similar effect on its Setting.</p> <p>5) The impact on historic views from Kedleston Hall and Park towards the Kedleston Hotel and adjacent areas</p> <p>The HIA states that the proposed development ‘...will be situated at the lower, western edge of the practice range, adjacent to ‘Bottom Covert’, a dense block of woodland...’. Elsewhere, it describes the ‘...large scale planting belts which follow the park boundary...’, the ‘...dense boundary tree planting of the Park’, and the ‘...backdrop of mature woodland...’, against which the ‘simple pavilion building’ would be seen.</p> <p>Figure 2: Extract from the OS 6” Revised Edition (1947) showing Kedleston Park, with the eastern boundary clear of woodland, although a number of ancient trees are shown which still survive there. The location of the proposed development is indicated (at ‘A’) with also the line of an historic view between Kedleston Hall and the Kedleston Hotel. The later woodland planting within the Golf Course area is highlighted with a green wash – a number of historic trees are shown within it, several of which still survive. Note the proximity of the proposed development site to the line of the historic view. Note also the large open paddock at the eastern boundary of the Park (blue</p>
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					<p>wash), which formerly provided an open foreground to the view of the Hotel, as well as being part of the Setting for the Park itself. Implicit in the above descriptions is the assumption that the woodland in question, a northern extension to 'Bottom Cover', is a part of the parkland design for Kedleston. In fact, the projecting area of woodland dates to the period after the Golf Club was set up in 1947, as it is not shown on the OS plan published in that year (see Figure 2 above, where this woodland area is indicated by a green wash) . Ordnance Survey and other plans also indicate that there was a designed view between Kedleston Hall and the Kedleston Hotel, with the large open paddock beyond the park boundary, providing an extended foreground and setting to the Hotel itself. This is the area of the current driving range, but it is clear also that this was an intended part of Kedleston Park's wider Setting. Whereas the current low-key use of this area as a driving by the Golf Club has little impact upon it, there is no doubt that the major development proposed would significantly compromise this part of the wider designed Setting of the Park and hence damage its Significance.</p> <p>6) The impact on views from the Grade II* Listed Kedleston Hotel and on its Setting</p> <p>The HIA acknowledges the location of the Kedleston Hotel to the '...north east of the practice range, on the opposite side of Kedleston Road...', as well as its functional link to the Bath House, located within the Park itself, and the likelihood of views from it into the Park . Nowhere however, does it actually assess the potential impact of the proposed development on these views and more widely on the Setting of the Grade II* Listed Hotel. A brief summary of Viewpoint B, adjacent to Kedleston Hotel , significantly fails to assess properly the likely visibility of the proposed development from this location. In fact, it is still possible clearly to appreciate a view of Kedleston Hall from Viewpoint 'B', as well as of the site of the proposed development itself, as shown in Figure 3 below. Given the scale of the proposed building, it is likely also that this will be clearly visible both from this viewpoint, as well as from both the Kedleston Hotel itself and from its immediate Setting (see below), and it will therefore negatively impact upon both of these.</p>
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					<p>Figure 3: View towards Kedleston Hall from 'Viewpoint B' immediately in front of Kedleston Hotel. The proposed development site, which is located just to the south of this view line, is also indicated. Given the scale of the proposed building here, it is likely to be clearly visible from this viewpoint. The levelled area visible in the mid-ground of the image, just beyond the hedge, appears historically to have been a tennis lawn associated with the Kedleston Hotel: it is thus intrinsically linked to the Hotel &amp; sits firmly within its Setting. The proposed building and associated car parking development would be even more prominent in the historic view to Kedleston Hall and to its historic parkland, when seen from this location.</p> <p>7) The impact on views of the Registered Park from the public footpaths and Bridleway to the east and south and east of the proposed development site</p> <p>The HIA describes views of the proposed development site from Viewpoints 'D' to 'G' &amp; 'H' on the public footpath to the south and east of the site, as well as from an unspecified location on the footpath from Quarndon to the east, and from 'J' &amp; 'K' on the Quarndon Bridleway No.14, still further towards Allestree. In all of these views, it accepts that the Registered Parkland would be visible beyond the proposed building. No attempt however is made to quantify the likely effects of these views upon the Registered Park or their negative impacts upon its Setting.</p> <p>8) The likely impact on views of the Registered Park from the Kedleston Road</p> <p>The Kedleston Road is the key approach from the south towards Kedleston Hall and to its Registered Park and Garden. The view from it to Kedleston Hall adjacent to Kedleston Hotel is shown above, and there are also other views to the Registered Park from a number of locations along this approach. The HIA however, confines itself to a single view from Allestree, around 1.5km distant from the proposed development site, concluding that from this location, it '...is not likely to be visible, owing to the distance involved...'. This may be the case, but it has failed to present any assessment of views closer to the proposed development site itself.</p> <p>The planning framework</p>
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					<p>For ease of reading, the relevant sections of the Amber Valley Borough Local Plan (2006) and the National Planning Policy Framework (2012) are included in Annex 1 . A summary is presented below of our conclusions relating to each of these:</p> <p>(i) The Amber Valley Local Plan (2006)</p> <p>It is clear that, for the reasons outlined above, the proposed development fails to comply with each of the Policies contained in Annex 1:</p> <ul style="list-style-type: none"> <li>• the proposed development site lies immediately adjacent to the boundary of the Kedleston Conservation Area, and is likely significantly to damage its Setting;</li> <li>• the proposed development, in our view, is likely due to its location and scale to have a significant adverse impact on the landscape character of Kedleston Park, which is a Grade I Registered Park and Garden;</li> <li>• the proposed development is, in our view, likely similarly to have a significant adverse impact upon the Setting of Kedleston Park, including views into and out of the Historic Park and Garden;</li> <li>• the proposed development, by virtue of its presence within a hitherto unrecognised design element of Kedleston Park (the peripheral paddock described at (5) above and shown in Figure 2), notwithstanding that this lies outwith the Registered Park boundary, and by physically damaging this element of the designed landscape, will similarly have a significant adverse impact upon the landscape character of the Historic Park and Garden;</li> <li>• The proposed development will have a significant adverse impact upon the Setting of the Grade II* Listed Kedleston Hotel.</li> </ul> <p>(ii) The National Planning Policy Framework (NPPF)</p> <p>1). The proposed development will, in our view and for the reasons outlined above, cause Significant, albeit less than substantial, harm to the Settings of the following designated heritage assets:</p> <ul style="list-style-type: none"> <li>• The Grade I Listed Kedleston Hall;</li> <li>• The Grade I Registered Kedleston Park;</li> <li>• The Grade II* Kedleston Hotel.</li> </ul> <p>2). The proposed development will also cause Significant, albeit less than substantial, harm to the fabric of the hitherto unrecognised design</p>
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					<p>element of Kedleston park, which is the open paddock to the south of Kedleston Hotel, as shown on historic plans, and as outlined at (4) above and illustrated in Figure 2.</p> <p>The above area of land in our view constitutes an undesigned heritage asset that merits the same or similar protection as the Kedleston Registered Park &amp; Garden, of which it is clearly a design element. It is also a key part of the Setting of the nearby Kedleston Hotel and was also historically a part of the facilities associated with it.</p> <p>3). As outlined above, the NPPF states (para.132, see Annex 1):  “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be...[our emphasis]... Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification”.</p> <p>It is our view that the Applicant has failed to demonstrate a “clear and convincing justification’ for the harm that will be caused by the proposed developments, to the heritage assets listed at (1) above.</p> <p>4). The NPPF also states (para.134, see Annex 1), in relation to developments that are likely to cause less than substantial harm to a designated heritage asset, that:  “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”</p> <p>It is clear that the proposed development, which is for business reasons and for the benefit of a private golf club (see Annex 1 para.134), similarly fails the test of public benefit.</p> <p>As outlined above, we therefore urge Amber Valley to reject this application.</p> <p>Yours sincerely  Margie Hoffnung</p>
Oxton House	Devon	E17/1500	II	PLANNING APPLICATION Erection of a dwelling. Oxton Mere Barn, Kenton. RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 28.03.2018</b></p> <p>Thank you for consulting The Gardens Trust on the above application which affects Oxton House, an historic designed landscape of national importance, which is included by Historic England on the Register of</p>

					<p>Parks and Gardens of Special Historic Interest.</p> <p>The Gardens Trust (formerly The Garden History Society) is the Statutory Consultee on development affecting all sites on the Historic England Register of Parks and Gardens of Special Historic Interest. The Devon Gardens Trust is a member of The Gardens Trust and responds on its behalf to consultations in the County of Devon.</p> <p>We have visited Oxton House, on several occasions, and have previously visited the application site. We have viewed the Historic England Register map and entry, and the planning application documents on your website. We would ask you consider the following comments:</p> <p>Oxton House is a late C18 picturesque designed landscape of national importance developed by the Rev John Swete, the late C18 diarist, artist &amp; traveller. Between 1789 and 1801, Swete undertook a series of tours through Devon and neighbouring counties, producing twenty volumes of diaries with over 600 watercolour illustrations of houses, antiquities and other features of picturesque interest, inspired by the Rev William Gilpin's Observations. The Rev Swete died at Oxton in 1821, and the following year (1822) the Lysons noted that 'Oxton is beautifully situated and the extensive pleasure grounds have been laid out with much taste'.</p> <p>Oxton House was altered c1830, and when in 1848 the estate was offered for sale, the particulars described 'lawns, parterres, shrubberies and park-like grounds... refreshed by rivulets and fishpools uniting below the House into a small lake'. Romantic walks and rides through the pleasure grounds and plantations were noted, and in the early C19 F W Stockdale described the woodlands at Oxton as 'remarkably picturesque'.</p> <p>Country houses such as Oxton House had consciously designed settings, intended to reflect the status of their owners by creating a deliberate aesthetic effect. The original late C18 design remains basically intact. The application is for the erection of a dwelling at Oxton Mere Barn. The Heritage Statement states that 'The application site is part of the Parkland landscape which has already been subject to notable changes. ...formerly part of the wider woodland, the application site was largely cleared in the 1970s/1980s. Historic planting has largely been lost</p>
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					<p>whilst that which does survive is very poorly maintained . It is therefore assessed that the application site is a more compromised, and therefore less sensitive, part of the Registered Park and Garden. ....The long standing presence and use and use of the agricultural barn within the site .....making it difficult now to appreciate as a simple picturesque piece of pleasure-walk through woodlands, as it would have originally been in Swete’s landscape design.</p> <p>There is simply no justification whatsoever in the argument that because this part of the Registered site has been degraded, it is perfectly acceptable to harm the historic landscape further by constructing a new dwelling.</p> <p>The proposed development would be in an existing copse and the existing trees would largely screen the development from view. However, trees have a limited life and, in time, the building would be exposed as an alien element in the historic designed landscape. This is a matter of considerable concern as views of a conspicuous modern building from within the landscape would be seriously detrimental to its character and appearance.</p> <p>The National Planning Policy Framework states a presumption in favour of sustainable development in both plan making and decision making, but recognises that there is a need to balance any adverse impacts against the benefits. NPPF paragraph 132 states that ‘the more important the heritage asset the greater the weight that should be given to their conservation. It should be also noted that ‘substantial harm to a Grade II park or garden should be exceptional’. NPPF paragraph 133 states that ‘where a proposed development will lead to substantial harm to, or total loss of significance of, a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.’</p> <p>The benefits offered by the applicant include a management plan for the land in their ownership, a bluebell walk and educational visits. These benefits cannot be considered as substantial public benefit sufficient to outweigh the harm to the significance of the heritage asset.</p> <p>Oxton House is on the Historic England Heritage at Risk Register</p>
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					<p>because the estate is in divided ownership and it is in a generally unsatisfactory condition with major localised problems. The loss of trees, the arable use of the parkland and the lack of a conservation management plan for the estate all contribute to the decline of the landscape. The benefits offered by the applicant in respect of the proposed development do not address the wider conservation issues at Oxtan House.</p> <p>However, if your Council is minded to approve the application, we suggest that, there should be a S106 Agreement requiring the applicant to implement a landscape scheme before the proposed dwelling is occupied; that a landscape buffer is planted and maintained in accordance with good horticultural and arboricultural practice in perpetuity; and that the site is secured against future development in perpetuity in order to prevent further damage to the historic designed landscape.</p> <p>We note that details of external works such as garages, sheds, bin storage, clothes drying areas, etc. do not appear to have been submitted with the application. Such elements would be extremely damaging to the historic landscape and we advise that any such subsidiary development should be identified as an integral part of the planning application prior to its determination. We further suggest that it would be appropriate to impose a condition on the planning permission to remove the permitted development rights to control such subsidiary development in the future.</p> <p>In conclusion, the proposed development would cause considerable harm to the significance of the heritage assets of Oxtan House and therefore should not be permitted. We recommend that your authority should refuse consent for this proposal as it clearly conflicts with national planning policy with regard to the conservation of the historic environment, and with your local plan policies.</p> <p>Yours faithfully John Clark Conservation Officer</p>
The Hoe	Devon	E17/1507	II	PLANNING APPLICATION Section 73 application to modify conditions: 1 (plans), 10 (further	<p><b>CGT WRITTEN RESPONSE 13.03.2018</b></p> <p>Thank you for consulting The Gardens Trust on the above which affects The Hoe and the setting of Mount Edgcumbe, both of which are</p>

				<p>details), 11 (materials samples), 35 (deliveries and refuse collection) &amp; 36 (use of loading bays) of planning permission 17/00952/FUL to allow for various amendments to the external design of the scheme, amended hours for deliveries and reconfiguration of the service yard to incorporate staff car parking spaces. MICELLANEOUS</p>	<p>included by Historic England on the Register of Parks and Gardens of Special Historic Interest at Grade II and Grade I, respectively. The Devon Gardens Trust is a member of The Gardens Trust and acts on its behalf in responding to consultations in the County of Devon.</p> <p>The application is for various amendments to the planning permission 17/00952/FUL for the erection of a 11 storey hotel buildings and a15 storey apartment building on the site of the former Quality Hotel, The Hoe. The Garden History Society and the Devon Gardens Trust, as well as Historic England objected to the planning application as the proposed development would result in more than substantial harm to the significance of designated heritage assets. Despite our objections planning permission was granted.</p> <p>Historic England, in their letter of 19 February 2018 , made a number of comments about the application with which we concur.</p> <p>Yours faithfully John Clark Conservation Officer</p>
Coleton Fishacre	Devon	E17/1528	II*	<p>PLANNING APPLICATION and Listed Building consent Proposed covered outdoor seating area within the courtyard area of the caf��. Coleton Fishacre, Brownstone Road, Kingswear TQ6 0EQ. CATERING</p>	<p><b>CGT WRITTEN RESPONSE 13.03.2018</b></p> <p>Thank you for consulting The Gardens Trust on the above applications which affects Coleton Fishacre, which are included by Historic England on the Register of Parks and Gardens of Special Historic Interest at Grade II. The Devon Gardens Trust is a member of The Gardens Trust and acts on its behalf in responding to consultations in the County of Devon. The proposed development would have a less than significant impact on the Registered Park and Garden and therefore the Trust does not wish to object.</p> <p>Yours faithfully John Clark Conservation Officer</p>
The Royal Pavilion Brighton	East Sussex	E17/1485	II	<p>PLANNING APPLICATION Erection of a mixed use development between 4 and 8 storeys over</p>	<p><b>CGT WRITTEN RESPONSE 02.03.2018</b></p> <p>Thank you for consulting the Sussex Gardens Trust (SGT). The Trust has also been notified by The Gardens Trust; the statutory consultee on</p>

			<p>basement and a mezzanine level incorporating 19,304sqm of commercial space (B1) and flexible retail (A1/A3) and/or nonresidential institutions (D1). 168no residential dwellings (C3) with associated parking, hard and soft landscaping and access. Former Amex House, Edward Street, Brighton BN88 1AH. MAJOR HYBRID</p>	<p>matters affecting registered historic parks and garden landscapes. The Sussex Gardens Trust itself seeks to promote the protection, enhancement and appropriate management of designated designed historic park and gardens in Sussex, including therefore the grade II registered Royal Pavilion Gardens. The SGT has read the submitted plans and supporting documents with care, having followed the emerging American Express developments with interest these past few years. The Trust has also taken the opportunity to walk the site and its surroundings, with a view to understanding fully the impact of the proposed development on the setting of the Royal Pavilion Gardens.</p> <p><b>Significance</b> You will be aware of the significance of the pavilion gardens, which were restored in the late 20thC, and the importance previously given to the assessment of development impact on views across the Royal Pavilion gardens. These now serve to provide a public park in a regency period garden landscape style as befits the Royal Pavilion, grade I listed.</p> <p>Despite the pressures upon this garden from heavy usage, it continues to offer a place for quiet enjoyment and appreciation of the nationally important architecture of the Royal Pavilion and the Dome complex by residents and visitors alike. The gardens are inward looking with views within and across the garden, and garden spaces framed by mature trees. The effect is of garden ‘rooms’ from where the Pavilion and its features, including its silhouette can be experienced and appreciated, without intrusion or distraction.</p> <p>Regrettably, when walking through the gardens from the southwest to the north east, distant major developments on the higher land to the east and north east are now visible above and through the tree canopies, and there is now a heavy dependence upon the remaining Elms, to screen from view or at least minimise the impact of these modern developments on this contained historic landscape.</p> <p><b>Impacts</b> Regrettably the Sussex Gardens Trust must oppose this development, because of its excessive height, which in such near proximity to the</p>
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					<p>Royal Pavilion and its gardens is considered harmful to the Royal Pavilion Estate's skyline.</p> <p>The Trust had expected a greater stepping down in height of this development, toward Edward Street, following the relocation of the American Express building further north, and the demolition of the former Amex building. In terms of impact on the setting of the Royal Pavilion Estate, the Trust sees little in the way of improvement on what was there before the demolition of the old Amex building.</p> <p>Much is made of the positive screening effect of existing trees within the Royal Pavilion grounds; but in the absence of evidence of a forward thinking management plan for the Royal Pavilion Garden, and no assurances that any such plan is to be implemented, little weight should be given to the screening currently available during the summer months.</p> <p>Taking both developments together, ie that now proposed together with the recently constructed new Amex building to the north, the resultant infilling of the backdrop to the pavilion gardens, between the Dome and the Pavilion, will be a very noticeable intrusion on the skyline, and create an apparent continuous ring of medium high rise dense urban development above the trees between the Dome and the Royal Pavilion, such that these treasured landmarks will no longer be seen as 'stand alone' historic monuments in a garden setting.</p> <p>Conclusion.</p> <p>The harm caused to the setting of the Royal Pavilion Estate may be less than substantial, but nonetheless there needs to be both greater justification for the size of development proposed and greater thought given to mitigation measures. In the absence of appropriate mitigation, the Sussex Gardens Trust opposes any development that breaches the skyline illustrated below, and therefore objects to planning application BH2018/00340.</p> <p>Yours faithfully  Jim Stockwell On behalf of the Sussex Gardens Trust. CC: The Gardens Trust</p>
Stancombe Park	Gloucestershire	E15/1097	I	PLANNING APPLICATION Erection of three polytunnels. Bird Farm Stancombe, Dursley,	<p><b>TGT WRITTEN RESPONSE 28.03.2018</b></p> <p>Since your email to me of 8<sup>th</sup> November last year, and my subsequent response on 4<sup>th</sup> January 2018, I have not received any reply from Stroud</p>

				Gloucestershire, GL11 6AY. AGRICULTURE, HORTICULTURE	DC regarding possible enforcement action concerning the structures erected on Bird Farm (now called Hope Farm) directly across the road from Stancombe Park (Grade I). In the interim, the owners of Bird/Hope Farm have cut down the hedges around their field and when I visited Stancombe two days ago the structures were clearly visible from within the heart of the Grade RPG (photo attached). I would like to repeat my request that your enforcement team looks at this as a matter of urgency if they have not already done so. I understand from the North Nibley Parish Council that the owners of Bird/Hope Farm intend to submit an application for a garden centre/café/shop on the site. This would of course necessarily include provision for car parking, toilet facilities etc, and the Gardens Trust (as statutory consultees with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks & Gardens) will be examining this application carefully when it comes through. I would very much appreciate it if you could please let me know what action you have taken or are proposing to take. Yours sincerely, Margie Hoffnung Conservation Officer
Painswick House	Gloucestershire	E17/1501	II*	PLANNING APPLICATION Conversion of existing building to provide ancillary habitable accommodation & new car port. The Barn, Painswick, Stroud, Gloucestershire. RESIDENTIAL	<b>CGT WRITTEN RESPONSE 03.03.2018</b> ... the gist of this one is that the proposal has no real impact on the northern boundary of The Rococo Garden associated with Painswick House, as it is screened by a thick belt of mature trees. I also made an unwanted suggestion of how the scheme could be improved to overcome a witter from the Painswick Parish Council. Best wishes, David Ball
Kingcombe	Gloucestershire	E17/1665	N	PLANNING APPLICATION Full Application for Erect a glasshouse in curtilage of listed building at Kingcombe, Kingcombe Lane, Chipping Campden, Gloucestershire GL55 6UN. GLASSHOUSE	<b>CGT WRITTEN RESPONSE 19.03.2018</b> Thank you for consulting The Gloucestershire Garden and Landscape Trust (GGLT) regarding the insertion of a kitchen garden and substantial glasshouse within the grounds of Kingscombe, near Chipping Campden. This garden and house is an important example of a 20th Century country house reflecting the personality of the client, accompanied by a very carefully designed garden and landscape setting. One must accept that gardens do change to reflect the aspirations of

					<p>subsequent owners. In this proposal, there is little conflict with the setting of both the main house or the key features of the important designed gardens associated with the house.</p> <p>Yours sincerely, David Ball, (on behalf of GGLT). GGLT would not wish to raise objection to this proposal</p>
Hatherop Castle	Gloucestershire	E17/1670	II	<p>PLANNING APPLICATION Demolition of Existing Dilapidated Glasshouses at Hatherop Castle School, Hatherop, Cirencester, Gloucestershire GL7 3NB. GLASSHOUSE</p>	<p><b>CGT WRITTEN RESPONSE 26.03.2018</b> My view was ( as a precis) that the Trust was not in a strong position to object:</p> <ul style="list-style-type: none"> <li>• The greenhouses are outside the Listing and Registered Park;</li> <li>• The context is heavily degraded, and the contiguous walled garden has a recent consent for an Astroturf sports pitch;</li> <li>• The pitch and greenhouses are incompatible uses;</li> <li>• The greenhouses are replacements probably built in the 1930's and are thoroughly derelict and dangerous.</li> <li>• The walled garden consent should achieve the reinstatement of the enclosing walls to the walled garden, and</li> <li>• I have suggested conditions to reinstate the South wall of the Listed stable court and the site of the greenhouses</li> </ul> <p>On this basis, I sent back a response that gave a neutral stance should the District choose to approve demolition, as the School was unlikely to accept replacing or restoring non original greenhouses where there was already a consent in place that jeopardised their continued existence.</p> <p>Best wishes, David Ball</p>
Wandsworth Park	Greater London	E17/0234	II	<p>PLANNING APPLICATION Change of use of the extension of the river walk in Wandsworth Park from Class D2 (assembly and leisure) to Class C3 (dwellinghouses) in order for the gardens of 105-115 Deodar Road to extend into the river walk. Area approx. 176 sqm. River Terrace abutting 105-115 Deodar Road SW15 2NU. GARDEN</p>	<p><b>CGT WRITTEN RESPONSE 02.03.2018 ADDITIONAL COMMENTS TO APPEAL</b> I write on behalf of the Planning &amp; Conservation Working Group of the London Parks &amp; Gardens Trust (LPGT). The LPGT is affiliated to The Gardens Trust (TGT, formerly the Garden History Society and the Association of Gardens Trusts), 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 gardens trust for Greater London and makes observations on behalf of TGT in respect of</p>

			<p>GROUND</p> <p>OUTCOME Refused  APPEAL LODGED 23.02.2018  Appeal Ref  APP/H5960/W/18/3195994  To be determined on the basis of  written representations</p>	<p>registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the London Inventory (see <a href="http://www.londongardensonline.org.uk">www.londongardensonline.org.uk</a>) and/or when included in the Greater London Historic Assets Register (HAR). The site is an area of public open space that forms part of Wandsworth Park, a Grade II listed Edwardian park. The site is known to us. The proposal would result in the loss of this area as public open space and absorb it into the adjacent private gardens. We support the Council's reasons for refusing the application. We agree that: "The proposed change of use would result in the long term privatisation of open space contrary to the strategic aims and objectives of in particular, the NPPF, policy 7.18 of the London Plan (2016), policies PL4 and PL9 of the Wandsworth Council's adopted Core Strategy (2016), DMO1, DMO3 and DMT3 of the adopted Development Policies Document (2016) and the Green Infrastructure and open environments: The All London Green Grid SPG (March 2012)."</p> <p>The proposal is contrary to the Wandsworth Strategy adopted March 2016.</p> <p>Core Policies for Places: Policy PL 4 - Open space and the natural environment states that:</p> <p>The Council will protect and improve public and private open space and Green Infrastructure in the borough, including Metropolitan Open Land, such as the major commons, parks, allotments, trees and playing fields as well as the smaller spaces, including play spaces, as identified in the Open Space Study and Play Strategy.</p> <p>Furthermore, the proposal is contrary to the London Plan (2016), Policy 7.18 that seeks to protect local open space.</p> <p>The Appellant states that the Reason for Refusal is incorrect in that "The proposed change of use would result in the long term privatisation of open space.....etc" and "The Applicants contend that the proposed change of use of the land under Class D2 (assembly and leisure) being changed to Class C3 (dwellinghouse) is merely semantics in this case." We disagree with this statement. The change of use from Class D2 to Class C3 cannot be regarded as senamtics. Clearly, if a change of use were to be granted, the area would no longer be public open space. The planning application stated that the area has been 'closed to the</p>
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					<p>public for some years due to antisocial behaviour of some users'. LPGT does not consider that this is justification for denying public access to this area into the future. We consider that the area should be maintained as public open space.</p> <p>LPGT respectfully request that the Inspector dismiss this Appeal for the reasons set out in the LPA's Reasons for Refusal, which are supported by representations submitted by third parties.</p> <p>Yours Sincerely Helen Monger Director For and on behalf of the Planning &amp; Conservation Working Group London Parks &amp; Gardens Trust</p>
Mayor of London's London Plan 2017	Greater London	E17/1598	n/a	LOCAL PLAN Mayor of London's London Plan 2017 consultation	<p><b>CGT WRITTEN RESPONSE 02.03.2018</b></p> <p>... Our response As is recognised in the draft plan, London's green spaces and public parks – around 3,000 throughout greater London – are a vital resource for the capital. They offer not only health and wellbeing benefits, but also mitigation against air pollution, noise pollution and flooding. Despite this, they are undervalued and under-resourced. We welcome the introduction of Natural Capital Accounting to demonstrate the true extent of their contribution, but we would like to see the Mayor go further by encouraging planning authorities to take the opportunity to build in additional funding at this stage through CIL and other Infrastructure payments to contribute to not only capital costs but to improving and increasing good quality green infrastructure through funding management and maintenance.</p> <p>The Trust is keen to see that the National Park City deliver real benefits to London by protecting and enhancing green space. If by becoming the first National Park City a mechanism for generation of funding across all London (similar to the Lea Valley Park) to invest in Green Infrastructure through a statutory contribution in tax that can adequately fund high quality management and maintenance of existing and new parks and GI, then it would achieve a tangible success.</p> <p>Similarly if a method can be devised for allowing local authorities to convert Community Infrastructure Levy (CIL) money into management and maintenance of parks, this would help counteract the current reductions in Central Government funding resulting and cuts to parks</p>



					<p>maintenance budgets leading to a decline in quality and quantity of green infrastructure. Such investment would deliver tangible benefits that could be measured.</p> <p>It also needs to champion environmental education and research working with providers such as the Field Studies Council.</p> <p>National Park City Status should imply certain associated planning powers in order to promote and protect green spaces, but this is not clearly stated in the policies and should be included if the National Park City is to deliver something tangible. Currently for example, even Grade II parks and gardens, which may be adversely impacted by planning applications, aren't currently even considered by Historic England (H.E) and thus have very little protection. Similarly we see ongoing encroachment and commercialisation of green spaces, with little by way of planning protection – these encroachments, even temporary, can have a substantial impact on the uses of parks and their beneficial effects in terms of wellbeing in a city that needs to become denser to meet the growing population projections. We would suggested advising planning authorities to include all listed landscapes in conservation areas in addition to other planning protection. Other suggestions for adequate protection should be specifically discussed with statutory consultees such as ourselves, and H.E.</p> <p>A National Park normally has planning officers to deliver additional policies and protection. We would like to see the GLA consider employing these in any National Park City designation, and carry out capacity building to encourage volunteers to help respond.</p> <p>As a general note, the Trust observes this is a long document without mention to special protection for the Royal Parks (which are a huge tourist draw) and designated historic parks and landscapes over and above greenspace, playing fields etc. There is an important distinction here.</p> <p>The Trust has restricted it's comments to focus only on matters which affect green space and historic landscapes. Moving onto the specific policies.</p> <p>Chapter 3 • Policy D1 A7 and A9 The Trust welcomes the principle of making sure Development Plans address the location of green and open spaces are conveniently located for social interaction but would urge</p>
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					<p>more tie in with the fact that parks help prevent or mitigate the impacts of noise and poor air quality as well as flooding.</p> <p>Page 3</p> <ul style="list-style-type: none"> <li>• Policy D1 B Development Designs - 5 we suggest a rewrite as follows: 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water and absorption of air pollution and noise pollution</li> </ul> <p>The Trust endorses statement 3.1.4 but urges the Mayor to note that a green corridor is not a substitute for provision of well designed landscapes of a more significant size that enable children to play.</p> <ul style="list-style-type: none"> <li>• Policy D4 Private outside space</li> </ul> <p>The Trust welcomes a minimum standards definition and the need for space to be of sufficient utility (para 3.4.6) but does not think these measures will deliver on the intent. An inner courtyard measuring 1.5m by 1.5m without daylight will not be a conducive open space – the Trust recommends a minimum daylight standard incorporated into this measure.</p> <ul style="list-style-type: none"> <li>• Policy D7 Public Realm</li> </ul> <p>The Trust is pleased to note paragraph H but prefers a re-write as follows:</p> <p>H Incorporate Maximise green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat, provide informal play for children and increase biodiversity.</p> <p>Comment 3.7.11 – We welcome the aspiration to place free drinking water fountains within parks but urge that careful attention be paid to location and detailed design, most especially in historic designed landscapes. The Trust therefore suggest that these would best be encouraged either in new parks and designed green landscapes; or as part of a restoration of an existing park where a fountain existed previously so as to respect the historic integrity of the designed landscape.</p> <ul style="list-style-type: none"> <li>• Policy D8 Tall Buildings</li> </ul> <p>C Impacts para 1, a, iii) We welcome this paragraph but believe a re-write would be beneficial as follows:</p>
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					<p>Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy. Care should be taken to minimize the impact of overshadowing on public parks and green spaces, particularly on summer afternoons for those spaces with children’s play facilities, seeking to achieve a minimum BREEAM standard access to sunlight of 2 hours between 3pm and 6pm.</p> <p>Para 3 Environmental Impact, a and c are particularly welcomed by the Trust. However, the use of open space needs to include reference to adjacent historic parks and green landscape.</p> <p>The Trust is pleased at the proposals for 3-D modelling but would wish these models to include assessments on sunlight and shadowing.</p> <p>Comment 3.13.6 Why does the Mayor delegate the definition of Tranquil Areas to Local Authorities? The Trust believes these should be designated by the London Plan in accordance with the rest of the spatial planning maps provided and would urge that the land identified by DEFRA should be designated for protection now. The Trust notes that the Heathrow Expansion public consultation is currently underway and believes that designation of these spaces by the Mayor would have a significant influence on the chosen flight paths and the impacts on biodiversity.</p> <p>Chapter 4. The Trust supports comment 4.2.9.</p> <p>Chapter 5 • Policy S3 Education and childcare facilities</p> <p>B Development proposals for education and childcare facilities 9) locate facilities next to parks or green spaces, where possible</p> <p>The Trust notes the above policy and agrees with Comment 5.3.10 that the design of education and childcare facilities is critical to the creation of a good learning environment but is concerned that locating a school next to a park or other green space may be seen as a substitute for providing on-site play areas, which should maximize opportunities for introducing biodiversity and green landscape.</p> <p>The Trust therefore recommends a rewording as follows of the previous</p>
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					<p>paragraph:</p> <p>8) ensure that facilities incorporate suitable accessible outdoor space onsite, ideally at ground level, which provide as much green space as possible for contact with nature and increasing biodiversity</p> <ul style="list-style-type: none"> <li>• Policy S4 and S5</li> </ul> <p>In recommending this wording above for Policy S3 B 8, the Trust notes that both policy S4 and S5 mention off-site provision. For both off-site and on-site provision we recommend that consideration be given to the quality of the design of these spaces. If play space is not well designed, play-areas can have quite an impact on the character and visual amenity of historic landscapes and other open spaces, adding clutter in the form of brightly coloured equipment, fencing, gates and CCTV etc. This is compounded in smaller open spaces. The Trust particularly welcomes Policy S4, para B 2,d) incorporating trees and/or other forms of greenery into play schemes.</p> <p>Policy GG1 in Chapter 1 discusses making the best use of land and promotes high-density, mixed-use development favouring brownfield land and surplus public sector land among other sites. This has potential to impact London’s historic landscapes in terms of increased footfall and associated demand for facilities and amenities. As land gets segregated to accommodate the additional uses this could result in fragmented parts of historic landscapes which in turn can lead to de-valuing the landscape and designing in social problems. The Trust strongly recommends that the Mayor works with HE to mitigate against this outcome by adding in a statement to support the maintenance of the historic character and significance of a landscape (see link with Comment 7.1.7).</p> <ul style="list-style-type: none"> <li>• Policy S7</li> </ul> <p>There is no specific mention of the social and cultural heritage evident in London’s cemeteries, yet Comment 5.2.8 earlier on discusses co-location of facilities. In particular the Trust believes several major historic cemeteries’ deserve special protection including the ‘Magnificent Seven’ (Brompton, Highgate, West Norwood, Tower Hamlets, Abney Park Cemetery, Kensal Green and Nunhead) amongst other historic cemetery landscapes.</p> <p>The Trust believes that in general when considering the re-use of burial</p>
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					<p>space thought should be given to the significance of the existing memorial. In seeking to increase burial space, boroughs should consider the landscape design intentions of the cemetery as a whole. The pressure for more space should not lead to the erosion of historic landscape design by the infilling of paths or other specifically designed open features. Guidance is provided, in particular in Chapter 8, by Technical Guidance on the Re-Use and Reclamation of Graves in London Local Authority Areas (October 2013) by London Environment Directors Network.</p> <p>Chapter 7 The Trust notes the policies proposed for Heritage and Culture and supports Comment 7.1.7 about setting of historic places playing an important part in the heritage significance. The Trust also strongly welcomes Comment 7.1.8 and recommends that Local Authorities are encouraged to monitor this situation and use their powers of intervention (including compulsory purchase).</p> <p>The Trust believes Table 7.1 Designated Strategic Views takes insufficient account of the views from parks, in particular in relation to the Royal Parks and some other areas of rare open space within the Central London zone. Equally important views from parks include views adjacent to Battersea Park, Bishop’s Park in Fulham, Syon Park, Duke’s Meadow, Hampton Court and Kew as well as Victoria Tower Gardens. The Trust therefore would encourage the introduction of protection for all views from the Thames river bank (blue space) adding iconic views such as the one of Battersea Power Station from Vauxhall.</p> <p>Chapter 8 The Trust endorses the views expressed by Parks for London for re-writing some of the policies. The absence of specific reference to London’s specific cultural heritage in terms of the Royal Parks and especially the network of London’s squares is remarkable – they are a huge tourist draw. The network of historic landscapes (designated by Historic England) also contribute significant to both wellbeing and environmental mitigation. The Trust also sees a vital role for recognizing the River Thames and the land adjacent to it as a historic landscape forming part of the Green Infrastructure (see response to Policy SI 14).</p> <ul style="list-style-type: none"> <li>• Policy G4</li> </ul> <p>Many local green and open spaces are not designated heritage assets and are often at risk if not identified in Local Plans. The Trust through</p>
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				<p>it's Inventory has been working hard to research and document the historic importance of these spaces as well as their social value. We endeavour to encourage local authorities to include these spaces in their Local Plans but would welcome further strengthening of this aspiration by the Mayor. The Trust would also strongly recommend the introduction of measures not only in relation to the quantum but the quality of open space and protection of it's setting, which the current policy as drafted has omitted.</p> <p>The Trust also notes there is a tendency for new memorials to chose to be sited in public parks and green spaces. This can alter their character and detract from the recreational value and in some instances their contribution to biodiversity and the environment. The Trust urges an additional policy is introduced encouraging new memorials to be placed in areas other than local green and open spaces.</p> <ul style="list-style-type: none"> <li>• Policy G5 The Trust welcomes this policy but would add that we also need green infrastructure such as rain gardens, green walls and green roofs that are appropriate to their historic setting. This policy should also encourage better management and maintenance of parks and other green spaces so they can reach their full Green Infrastructure potential. With the right management parks can help cool the city but the evapotranspiration systems can't work if sites are parched, have inappropriate planting, are compacted or paved over with hardstanding to cope with the levels of over-use in areas of open space deficiency. In that light we also urge greater care is taken to make sure that new space is given over to full public access rather than as private development which are often under-used and exacerbate the surrounding impact on existing public green space. Examples include the area along Nine Elms and near St George's Wharf where landscapes are kept locked mainly for viewing and are rarely used, and where planting does not offer as much environmental mitigation as possible. With this in mind, the Trust queries the values placed in Table 8.2 and disagrees with the weighting for Amenity Grassland being of less value than Green Walls or Standard trees planted in pits with soil volumes less than two thirds the project canopy area of the mature tree, as we believe the social value and potential for use as informal play area has been overlooked in these calculations.</li> </ul>
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					<ul style="list-style-type: none"> <li>• Policy G7</li> </ul> <p>The Trust is concerned that the tree planting programmes may lead to tree canopy increase in existing open spaces to the detriment of other habitat types. Many of London’s small open spaces are compromised already by too much dense tree cover that makes them dark and uninviting. This loss of access to light has been amplified by the increase in tall buildings particularly in the centre of London detracting from the unique sense of calm and relaxation that parks can afford. This often leads to a fear of anti-social behaviour, real or perceived. These spaces are often planted with good intentions but then not managed due to lack of funds, and sometimes understanding.</p> <p>The Trust fully supports increasing the number of large canopy street trees as part of the Healthy Streets guidance/agenda. However, there has been historically many trees planted in historic landscapes, parks and open spaces which has been inappropriate to their character.</p> <p>Either as spaces become so densely treed, or planted with inappropriate species that can destroy views and sense of place – and these are often the aspects people love about parks and gardens. As the city seeks to urbanize and densify occupation further, the need to preserve areas for tranquillity and improvements to mental health and well-being will become ever more important.</p> <p>The Trust believes greater clarity should be given about what constitutes strategic locations and urges protection of historic landscapes as a caveat to this policy but welcomes protection of ‘veteran’ trees.</p> <p>Chapter 9 Policy SI14 The Trust notes that although there is reference to the strategic importance of the Waterways there is no definition of this role. These are important spaces and deserve designation in their own right as blue spaces that also have an impact on biodiversity and well-being.</p> <p>Chapter 10 The Trust supports prioritizing walking and cycling but believes there needs to be greater protection of green spaces often impacted by cycling infrastructure and would welcome clarity over how this can be managed.</p> <p>Sent by: Helen Monger Director on behalf of the Trust</p>
Heathrow	Greater	E17/1716	n/a	GENERAL CORRESPONDENCE	<b>CGT WRITTEN RESPONSE 29.03.2018</b>

Airspace Principles	London			Airspace Principles Consultation Document	<p>RESPONSE TO AIRSPACE PRINCIPLES CONSULTATION  Submitted online by Helen Monger, Director  At Heathrow, the majority of flights take place during the daytime and evening and for this reason most of the questions (Questions 1-5) relate to flights between 7am and 11pm. Question 6 in this form relates specifically to flights between 11pm and 7am, which is classified by Government as the night period. While there are significantly fewer flights during this period, we know that they can be particularly disruptive to local residents.</p> <p>Q1. Principle 1: Flight Paths  Please read pages 12 and 13 of the Airspace Consultation Document before answering this question. Please select one of the options a-c, and provide any comments in the box below. A trade-off exists between these three principles and we would like to understand which principle you prefer.</p> <p>When designing airspace, Heathrow should:  Please select one box only</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> a) Minimise the total number of people overflown, with flight paths designed to impact as few people as possible</li> <li>b) Minimise the number of people newly overflown, keeping flight paths close to where they are today, where possible</li> <li>c) Share flight paths over a wider area, which might increase the total number of people overflown but would reduce the number of people most affected by the flight paths as the noise will be shared more equally</li> </ul> <p>Please provide any comments you have on flight paths in the box below  Minimizing the total number is not the only part of the solution. It is also about following 'noise corridors' such as existing trunk roads where existing noise means a differential will be less noticeable. This isn't an option provided in your questionnaire.</p> <p>Q2. Principle 2: Urban and rural areas  Please read page 14 of the Airspace Consultation Document before answering this question. Please select one of the options a-b and provide any comments in the box below.</p> <p>When designing airspace, Heathrow should:  Please select one box only</p>
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					<p>✓ a) Prioritise routing aircraft over urban areas, recognising that urban areas have higher general noise levels</p> <p>b) Prioritise routing aircraft over rural areas where fewer people live Please provide any comments you have on overflight of urban or rural areas in the box below</p> <p>Even within urban areas there are differentials of noise. Parks offer tranquility within the urban framework and should be protected - they also provide biodiversity and fragile eco-systems. Roads and other transport infrastructure already provide background noise and can easily be followed.</p> <p>Q3. Principle 3: Urban areas Please read page 15 of the Airspace Consultation Document before answering this question. Please select one of the options a-b and provide any comments in the box below. When designing airspace in urban areas, Heathrow should: Please select one box only</p> <p>a) Prioritise routing aircraft over parks and open spaces rather than residential areas</p> <p>✓ b) Prioritise routing aircraft over residential areas, avoiding aircraft overflight of parks and open spaces Please provide any comments you have on parks and open spaces in urban areas in the box below</p> <p>This is a loaded question. Parks are of primary importance to enabling dense living whilst allowing for health and well-being benefits. Parks in London are already under considerable pressure. Routing aircraft over residential areas does not always mean flying over housing, but instead can be filtered along existing transport corridors and over industrial areas. Special consideration should be given also to the status of historic landscapes such as Richmond Park and Kew Gardens which are currently blighted by inappropriate aircraft noise.</p> <p>Q4. Principle 4: Noise and emissions Please read page 16 of the Airspace Consultation Document before answering this question. Please select one of the options a-b and provide any comments in the box below. When designing airspace, Heathrow should: Please select one box only</p>
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				<p>a) Design flight paths that prioritise the reduction of aircraft noise for local communities over those that reduce fuel burn and emissions*</p> <p>✓ b) Design flight paths that prioritise a reduction in fuel burn and emissions* over those that reduce noise for local communities</p> <p>Please provide any comments you have on noise and emissions*: The shortest route ultimately means the minimum amount of disturbance for local communities as well as being more economically and environmentally sustainable.</p> <p>*Note that emissions refer to those impacting climate change, not health.</p> <p>Q5. Principle 5: Technology and innovation Please read page 17 of the Airspace Consultation Document before providing any comments on the statement below. In order to deliver any of these design principles, all aircraft will need to be equipped with the latest technology. We will not design flight paths to accommodate aircraft with older navigation technologies and there may be parts of the design where aircraft with the highest specification of navigation technology have an advantage. Please provide any comments you have on technology and innovation in the box below Not our area of expertise. We hope technology will not only reduce noise impact, but light pollution, and maximise energy efficiency.</p> <p>Q6. Principle 6: Night flights Please read page 18 of the Airspace Consultation Document before providing your response to the question below. Heathrow has made good progress over the last few years in reducing the number of late running flights that operate from the airport and, with expansion, we have committed to a six and a half hour ban on scheduled flights in the night period (sometime between 11pm and 7am). However, some aircraft will need to use Heathrow late at night or early in the morning: what key principles should we apply to the design of flight paths for arrivals and departures during these times? (You may like to consider the design principle options set out in Questions 1-5). Please provide any comments in the box below There should be no distinction in the adoption of principles between</p>
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					<p>night time and daytime flight paths. We welcome the extension of the flight ban and hope it can go further. The supporting infrastructure (train, tube, bus etc.) does not at present serve Heathrow well at the extreme ends of the flight patterns as passengers seeking a flight at 7am need to check in by 5am and few transport operators run through the night meaning a reliance on roads.</p> <p>Please note: Heathrow's future plans include a six and a half hour ban on scheduled night flights between 11pm and 7am – we are consulting on this in our expansion consultation, please see section 4.2 of our Expansion Consultation Document for more information.</p> <p>Q7. Please provide any other comments you would like to make about our approach to airspace change, and let us know if there are any other design principles we should consider.</p> <p>Please provide any comments in the box below</p> <p>The Consultation as presented suggests that airport expansion and aircraft usage is inevitable. The addition of a new runway is likely to lead to some 250,000 extra flights - the case for this as a necessity over and above the environmental and health impacts has not been demonstrated and as yet the proposals are a 'preferred option' and not agreed. Setting up false choices between rural and urban; parks and residential is not helpful when there are far greater subtleties at play in relation to chosen routes and desirability of expansion proposals.</p>
Heathrow Airport Expansion	Greater London	E17/1717	n/a	GENERAL CORRESPONDENCE Heathrow Airport Expansion consultation	<p><b>CGT WRITTEN RESPONSE 29.03.2018</b></p> <p>RESPONSE TO AIRPORT EXPANSION CONSULTATION</p> <p>Submitted online by Helen Monger, Director</p> <p>1. Expanding Heathrow</p> <p>The expansion of Heathrow will be one of the largest infrastructure projects in the UK and developing our final plan will be a complex process.</p> <p>We now need your feedback which, together with our on-going design work and the findings of more detailed surveys and assessments, will be used to develop a preferred scheme for Heathrow's expansion.</p> <p>1a. Please tell us what you think about Heathrow's plans to expand the airport.</p> <p>I write on behalf of the Planning &amp; Conservation Working Group of the London Parks &amp; Gardens Trust (LPGT). The LPGT is affiliated to the</p>

					<p>Gardens Trust (GT) , 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.</p> <p>The LPGT is the gardens trust for Greater London and makes observations on behalf of the GT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the London Inventory (see <a href="http://www.londongardensonline.org.uk">www.londongardensonline.org.uk</a>) and/or when included in the Greater London Historic Assets Register (HAR).</p> <p>We welcome the opportunity to take part in this consultation. The Trust is concerned about the likely environmental impacts (in particular noise and air pollution) as a result of increased flights and questions the need for additional air traffic in particular for freight. The Trust has commented separately on the air space principles and the likely impact on historic parks and gardens across London.</p> <p>2. Runway, Terminals and Aprons</p> <p>Runway</p> <p>The new runway will be located to the north west of our two existing runways. Runway options in this area have been identified that vary in length from 3,200m to 3,500m and their east-west position. Before answering this question please read Section 2.1 of the Airport Expansion Consultation Document.</p> <p>2a. Please tell us what you think about the options for the new runway. Our main concern relates to the green space and historic landscape within the London Boroughs of Hillingdon or Hounslow. We note that Harmondsworth is likely to be significantly affected, impacting on conservation areas, similarly but to a lesser extent Colnbrook and Sipson. A smaller runway will allow greater land for water runoff (as noted in the consultation documents about preparing for weather extremes).</p> <p>2b. What factors do you think should be important in fixing the precise location and length of the runway?</p> <p>We can see that a range of option 'Families' have been considered. Any options which can minimise impacts on the locally important Green Belt</p>
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					<p>and nature designations should be a priority.</p> <p><b>Terminals and Aprons</b>  To serve the increased number of passengers and aircraft that will use the expanded airport, new terminal and apron infrastructure will be required. Before answering this question please read Section 2.2 of the Airport Expansion Consultation Document.</p> <p>2c. What factors do you think should be important in locating new terminal and apron space?  We question the ruling out of expansion of T3 and the need for such a large proposed northern area, which will have the greatest impact on historic landscapes in the vicinity.</p> <p><b>Taxiways</b>  A well-designed taxiway system must provide efficient and safe links that deliver predictable journey times for passengers, lower operating costs for airlines, and greater efficiencies which will help us deliver on our commitments around noise and air quality.  Before answering this question please read Section 2.3 of the Airport Expansion Consultation Document.</p> <p>2d. What factors do you think should be important in deciding the location of new taxiways?  On the basis that expansion is necessary in the proposed location, the Trust accepts that (Around the End Taxiways) ATETs are best placed nearest the M25 to minimise noise disruption to local communities and the surround historic landscapes.</p> <p><b>3. Roads and rivers</b>  <b>M25 Alignment and Junctions</b>  The construction of a new north west runway will extend the airport to the west. This will affect the route of the M25 between Junctions 14 and 15 and the operation of Junctions 14 and 14a. Before answering this question please read Sections 2.4 and 2.5 of the Airport Expansion Consultation Document.</p> <p>3a. Please tell us what you think about the re-positioning of the M25.  The Trust has no expertise in this area but recognises the ingeniousness of the engineering proposal which enables the M25 to continue whilst building a tunnel. The Trust objects to proposals for 'collector-distributor' roads which will further increase the use of land and is likely</p>
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					<p>to encourage greater road usage.</p> <p>3b. Please tell us which family of options you prefer for the alterations to Junctions 14 and 14a and the reasons why.</p> <p>The Trust does not have expertise in this area but reiterates it's response to 3a.</p> <p>Local Roads</p> <p>The expansion of Heathrow will affect local roads. There are a number of options for replacing these roads, transferring traffic on to other routes and re-establishing local connections. Before answering these questions please read Section 2.6 of the Airport Expansion Consultation Document.</p> <p>3c. Please tell us which option you prefer for the diversion of the A4 and the reasons why.</p> <p>The Trust does not have expertise in this area.</p> <p>3d. Please tell us which option you prefer for the diversion of the A3044 and the reasons why.</p> <p>The Trust does not have expertise in this area.</p> <p>3e. Please tell us which option you prefer for the Stanwell Moor junction and the reasons why.</p> <p>The Trust does not have expertise in this area.</p> <p>3f. Please tell us what you think about the options to improve access to the Central Terminal Area.</p> <p>The Trust does not have expertise in this area.</p> <p>River Diversions and Flood Storage</p> <p>The expansion of Heathrow will affect local rivers and areas of flood plain. There are a number of options for the diversion of these rivers and the replacement of flood storage. Before answering these questions please read Section 2.7 of the Airport Expansion Consultation Document.</p> <p>3g. Please tell us what you think about the options for the diversion of rivers and the approaches to replacement flood storage.</p> <p>The Trust welcomes the approach in section 4.6 seeking to prioritise: Biodiversity; Water Environment; and Landscape and Visual Amenity. The Trust would like to see the airport consider social amenity of landscapes too – enabling some public access where possible to some of the natural habitats that will be created or maintained. As an</p>
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					<p>overarching principle, the Trust would recommend that the airport seeks to maintain as much as possible of what is already present rather than re-creating/creating new habitats.</p> <p>Until further details are explored about the proposals for flood storage it is difficult to comment but we would prefer an option that seeks to minimize extending the land buried under water and Approach 1 although more costly to deliver offers a way of achieving this to the benefit of the natural environment. The Trust suggests that the use of Natural Capital Accounting be used as a way of offsetting the cost of investing in particular options versus the long term benefits to have a fuller picture of the cost-benefit analysis.</p> <p>4. Additional land</p> <p>To support the operation of an expanded airport we will need additional land outside the airport boundary. This will include land for construction sites, car parking and commercial facilities, as well as new landscaping. We will also need land to accommodate businesses that need to be relocated. Before answering these questions please read Sections 2.8 to 2.11 of the Airport Expansion Consultation Document.</p> <p>4a. Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport supporting facilities.</p> <p>The Trust does not have expertise in this area.</p> <p>4b. Please tell us what you think about our approach to providing car parking and the potential site options we have identified.</p> <p>The Trust does not have expertise in this area but would prefer to see as much parking kept within the boundaries of the airport and greater consideration of public transport as the primary method for approaching the airport.</p> <p>4c. Do you have any comments on the land uses that will be affected by Heathrow's expansion?</p> <p>The Trust does not have expertise in this area. The Trust is interested in the areas intent for landscaping and planting to reduce the potential effects of expansion which have yet to be specified. The Trust would urge horticultural variety for visual amenity and to mitigate against air pollutants and water runoff.</p> <p>4d. Please tell us what you think about the sites identified for the</p>
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					<p>relocation of the Immigration Removal Centres? If you have a preference, please tell us why.</p> <p>The Trust does not have expertise in this area.</p> <p>4e. Please tell us what you think about the locations and sites that we have identified as being potentially suitable for airport related development.</p> <p>The Trust does not have expertise in this area.</p> <p>4f. Do you have any views on how the demand for additional airport related development such as hotels and offices might best be delivered?</p> <p>The Trust does not have expertise in this area.</p> <p>4g. Please tell us how you think we should best bring the various components together to build our masterplan for the expansion of the airport and what factors you think should be most important in our decision-making.</p> <p>The Trust questions the overall scale of the expansion and would prefer to see as much development confined within the envelope of the airport site. The Trust urges further consideration of the visual intrusion from nearby historic landscapes such as Cranford Country Park; Victoria Lane Burial Ground; St Mary's Churchyard, Harmondsworth Burial Ground and Harmondsworth Village Green which are designated historic landscapes.</p> <p>4h. Please tell us what you think about the sites we have identified as potential construction sites, and the approaches we are considering to manage the effects of construction.</p> <p>The Trust does not have expertise in this area.</p> <p>5. Managing the effects of expansion</p> <p>The expansion of Heathrow must happen in the right way. We have developed a number of approaches to ensure that the effects associated with the construction and operation of an expanded Heathrow are effectively managed. You can find relevant information on these approaches in Section 4 of the Airport Expansion Consultation Document.</p> <p>Property Compensation, Property Hardship and Land Acquisition</p> <p>We recognise that people who live in or own property near Heathrow will be affected by its expansion. Section 4.1 of the Airport Expansion</p>
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					<p>Consultation Document and our Property Policies Information Paper sets out our proposals to ensure that those affected are fairly compensated.</p> <p>5a. Please tell us what you think about our Property Policies. The Trust does not have expertise in this area.</p> <p>Noise</p> <p>Noise is one of the most significant concerns for communities living close to airports. Section 4.2 of the Airport Expansion Consultation Document and Our Approach to Noise set out options to reduce, minimise or mitigate the effects of noise arising from the expansion of Heathrow.</p> <p>We would like to know your views on Our Approach to Noise, in particular:</p> <p>5b. A noise envelope is a package of measures that can be used to reduce noise. Please tell us your views on the objectives of the noise envelope and the timeline for its development.</p> <p>The Trust notes that Heathrow's committed goal is to expand while affecting fewer people with noise and the achievements reducing existing noise levels. We feel that the goal should be extended to affecting people with less noise overall (not just fewer people) - this is pertinent to wildlife benefits too. The Trust acknowledges proposals for working with a Community Noise Forum but questions what powers they will have in the decision making process if they are to be effective. The Trust welcomes use of quieter planes, noise insulation and ban on night flight. The Trust has commented separately on the Airspace Principles Consultation - but urges a re-think on flying over parkland particularly designated historic spaces. The Trust believes that as well as compensating householders, the airport should compensate local authorities for loss of amenity value in park land by setting up a fund for public parks as part of any compensatory measures and that this has been overlooked.</p> <p>5c. Is there anything further we should be considering to reduce noise? No further comments.</p> <p>5d. Please tell us what you think about our suggested approach to the provision of respite.</p> <p>The Trust welcomes any respite afforded, particularly for the benefit of</p>
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				<p>natural areas of land.</p> <p>5e. Please tell us what you think of our proposals for noise insulation and phasing of delivery.</p> <p>See comments in 5b – the Trust believes the amenity value of public parks and open land has been overlooked and that a fund should be set up in perpetuity for surrounding London Boroughs to enable them to invest in other public parks in their areas to compensate for the loss of amenity value for their residents.</p> <p>5f. A 6.5 hour night flight ban on scheduled flights is required sometime between 11pm and 7am. Our current preferred option for this is from 11pm to 5.30am. Please tell us when you think the night-flight ban should be scheduled and why.</p> <p>The Trust has no expertise in this area but would recommend further thought is also given to natural considerations such as impact on birdsong. Additionally the Trust would want to see public transport fully integrated into the preferred options so that if people needed to check in for early flights they can easily get there.</p> <p>Surface Access</p> <p>Section 4.3 of the Airport Expansion Consultation Document and Our Approach to the Development of a Surface Access Strategy set out our priorities and targets for the ways in which passengers, visitors, workers and commercial traffic will access the expanded airport.</p> <p>We would like to know your views on Our Approach to the Development of a Surface Access Strategy, in particular:</p> <p>5g. Please tell us what you think about our priorities and initiatives we propose to use to develop our surface access strategy.</p> <p>The Trust does not have expertise in this area but welcomes all transport that minimises environmental impacts.</p> <p>5h. Please tell us what you think about the options to use road-user charging to reduce emissions and to manage vehicular access to the airport.</p> <p>The Trust does not have expertise in this area.</p> <p>Air Quality and Emissions</p> <p>Section 4.4 of the Airport Expansion Consultation Document and Our Approach to Air Quality set out options and approaches to reduce or mitigate the potential local air quality effects that may arise due to the</p>
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					<p>expansion of Heathrow.</p> <p>We would like to know your views on Our Approach to Air Quality, in particular:</p> <p>5i. Please tell us what you think about the measures proposed to manage emissions. Are there any other measures that we should consider?</p> <p>The Trust welcomes the 'triple lock' but also urges greater consideration is given to horticulture as a means of carbon sequestration and other air pollutant capture.</p> <p>Carbon and Climate Change</p> <p>Section 4.5 of the Airport Expansion Consultation Document and our Approach to Carbon and Climate Change set out potential options and approaches that could be used to reduce or mitigate the carbon and climate change effects anticipated to arise as a result of the expansion of Heathrow.</p> <p>We would like to know your views on Our Approach to Carbon and Climate Change, in particular:</p> <p>5j. Do you have any comments on our approach to limiting carbon emissions from the design, construction and operation of an expanded Heathrow?</p> <p>There are insufficient details to comment on at present but the Trust urges as much use of green infrastructure (living walls, grass amenity areas, interesting planting) as possible to seek carbon reduction and also enable water absorption to avoid flooding.</p> <p>Natural Environment</p> <p>Section 4.6 of the Airport Expansion Consultation Document and Our Approach to the Natural Environment set out the key design considerations and provide our likely response to the natural environment as part of the expansion of Heathrow.</p> <p>We would like to know your views on Our Approach to the Natural Environment, in particular:</p> <p>5k. Please tell us what you think about our approach to natural environment issues.</p> <p>The Trust warmly welcomes these measures. The Trust is aware of a number of environmental initiatives taking place at the airport including beekeeping. The Trust would welcome more opportunities for the</p>
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					<p>public to visit the proposed landscaped areas taking into account needs for security and safety. Participation in events such as Open Garden Squares Weekend with guided pre-booked tours would go some way to allowing the public a greater understanding of the natural landscape around the airport.</p> <p>5l. Are there any opportunities that the expansion of Heathrow could provide to enhance the natural environment?</p> <p>From the documentation provided it looks as if almost all avenues have been explored on site. However, the Trust believes insufficient account has been taken of the loss of amenity value for many of the surrounding parkland and nature rich areas as a result of the increased air traffic. As previously mentioned, the Trust believes that an endowment fund; grant scheme; or additional flight levy should be set up for London's public Parks to support their maintenance and enhancement in the surrounding boroughs most impacted by the airport development, so that public amenity can be supported/or provided elsewhere.</p> <p>Historic Environment</p> <p>Section 4.7 of the Airport Expansion Consultation Document and Our Approach to Historic Environment set out the key considerations and provide our likely response to the historic environment as part of the expansion of Heathrow.</p> <p>5m. Please tell us what you think about our approach to historic environment issues.</p> <p>The loss of heritage assets such as the Longford Conservation Area are irreplaceable and whilst way finding and cycle paths are helpful for the remainder there is an undeniable cost. Whilst capital investment is welcome, a better option would be to set up an ongoing levy or other mechanism to fund and sustain other heritage assets (and in particular parks and historic gardens across London which are not supported through any statutory funding). This would bring a huge benefit across the capital and provide a unique way of supporting and offsetting the damage being caused in perpetuity.</p> <p>Other considerations</p> <p>6. Having considered everything you have read, do you have any further comments in relation to our proposals for the expansion of Heathrow?</p>
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					<p>No further comment.</p> <p>7. Please tell us your views on this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and feedback form etc.).</p> <p>The Trust acknowledges that this is a very complex development proposal that inevitably has led to substantial documentation. Nonetheless it was frustrating to have to cross-refer with the Emerging Plans and other documents that did not always follow the same sequence - it would have been better to have single subject booklets eg. conservation; noise; pollution; airport logistics etc. Many of the questions were technical and the opportunity to skip sections would have been helpful. The maps were inadequate with changing scales dependent on the subject. The heritage and environment discussion would have benefitted from a mapping of the the conservation areas and historic building being lost and those in the noise envelope to better understand the issues.</p> <p>The exhibition in areas some distance away but nonetheless impacted, such as the display in Vauxhall is welcomed.</p>
Gadebridge Park	Hertfords hire	E17/1602	N	PLANNING APPLICATION REMOVAL OF PLAY AREA AND INSTALLATION OF CAR PARK. GADEBRIDGE PARK CAR PARK, QUEENSWAY, HEMEL HEMPSTEAD HP1 1HR. PARKING	<p><b>CGT WRITTEN RESPONSE 17.03.2018</b></p> <p>We would need to see the planting proposals, which are not shown on the plan supplied, before we can comment in detail. It would appear that at least 2 trees will have to be felled, although this is far from clear from the plan. If that is the case then replacement trees should be planted to maintain the tree cover in this part of the historic parkland of Gadebridge (on Hertfordshire Gardens Trust Local List). Until such time as we have further information and can comment in detail we will lodge an objection to the scheme as proposed.</p> <p>Kate Harwood</p>
Gobions (Gubbins)	Hertfords hire	E17/1619	II	PLANNING APPLICATION Erection of a 4-bedroom dwelling following the demolition of existing stables and outbuildings. Land rear of Nos 10-18 Mymms Drive, Brookmans Park, Hatfield AL9 7AF. DEMOLITION, RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 31.03.2018</b></p> <p>Thank you for consulting Hertfordshire Gardens Trust, a member of The Gardens trust, statutory consultee for historic parks and gardens. The site of the application is within the boundary of Gobions Park, listed at Grade II on the Historic England Register. It is one of Hertfordshire's important early 18th century gardens about which much more has recently been discovered since the Register was compiled. Further map evidence of the role of Charles Bridgeman, the most import early 18th</p>

					<p>century landscape designer, confirmed by landscape surveys by the HGT, add much to the evidence of this being a key national site at the time. Much still remains within the woodland and elsewhere, including key designed views from the period.</p> <p>We object to the application as it harms the rural nature of the parkland, thus harming the significance of this heritage asset, contrary to the NPPF and WHBC's policies (SADM 15). We consider that the harm to the Registered landscape considerably outweighs any benefits accruing from the building of one house.</p> <p>We note that there is no Heritage Statement, Heritage Impact Assessment, or Archaeological Assessment attached to the application which takes no consideration of the historic views, and remaining garden fabric (including buried remains).</p> <p>We urge you to refuse this application</p> <p>Kate Harwood Conservation &amp; Planning</p>
Moor Park	Hertfords hire	E17/1672	II*	<p>PLANNING APPLICATION Demolition of existing dwelling and construction of a new dwelling house comprising of two storey and loft conversion with basement and associated landscape works. 9 Park Close, Rickmansworth, Hertfordshire. RESIDENTIAL</p>	<p><b>CGT WRITTEN RESPONSE 26.03.2018</b></p> <p>The Gardens Trust have sent me the planning application details for 9 Park Close Rickmansworth (18/0145/FUL). These I received on 22 March but when I tried to comment today I found that a decision had been made on 19 March 2018 to approve this. I am somewhat confused by this, as you will understand.</p> <p>I did make comments on the application at pre-app stage (17/2446/PREAPP) on 26 November 2017. I indicated that, although we had no objections to the proposals per se, we were concerned about the about of glass and the screening it would require to prevent the setting of Moor Park Registered landscape being harmed.</p> <p>Kind Regards Kate Harwood Conservation &amp; Planning Hertfordshire Gardens Trust</p>
Wendover Lodge, Welwyn	Hertfords hire	E17/1688	N	<p>PLANNING APPLICATION Fell and replace 2 x Scots Pine trees (T1) covered by TPO 823 (2018). Wendover Lodge, 11A Church</p>	<p><b>CGT WRITTEN RESPONSE 31.03.2018</b></p> <p>Thank you for consulting The Gardens Trust, of which HGT is a member. We consider these trees are important in the historic landscape, marking the entrance to the village of Welwyn, and formerly part of the</p>

				Street, Welwyn AL6 9LR. TREES	Danesbury historic parkland.. Although the property is not within the Conservation Area, it is part of the setting of this heritage asset. The loss of these trees will adversely affect the village setting. However, as we understand from the application that both trees are in poor condition and will be replaced, we have no objection to this application. Kate Harwood
6 Newitt Court, Welwyn	Hertfords hire	E17/1695	N	PLANNING APPLICATION Fell T1x Willow Oak and replace with the same covered by TPO 450 T82. 6 Newitt Court, Welwyn AL6 9FY. TREES	<b>CGT WRITTEN RESPONSE 31.03.2018</b> Hertfordshire Gardens Trust have no objection to the felling of this tree, providing it is replaced to provide screening to the remainder of this historic landscape. Kate Harwood
Gobions (Gubbins)	Hertfords hire	E17/1703	II	PLANNING APPLICATION Erection of a single storey front extension. 31 Great North Road, Brookmans Park, Hatfield AL9 6LB. BUILDING ALTERATION	<b>CGT WRITTEN RESPONSE 31.03.2018</b> The application pertains to a property lying on the edge of Gobions Park, Registered at Grade II, and as such part of the setting of the historic park. On the basis of the information contained within this application, we do not consider that the proposals will harm the setting, and thus the significance of the Registered parkland. We therefore have no objections to the proposals as given in this application. Kate Harwood
Denton Conservation Area	Lincoln shire	E17/1664	n/a	LOCAL PLAN Conservation Area Appraisal: Review	<b>CGT WRITTEN RESPONSE 16.03.2018</b> Thank you for recently consulting Lincolnshire Gardens Trust (LGT) for comment re the above. LGT is a conservation and education charity dedicated to promoting awareness of the significance of historic parks, gardens and designed landscapes in Lincolnshire, their heritage value and their enjoyment, to local communities. Since LGT is an associate member of, and works closely with, the national amenity society /charity, The Gardens Trust, I have copied this letter to their conservation staff. Please ensure that they are copied in to any future consultation concerning Denton Park. We welcome that key views of the Denton area have been taken into consideration in this latest appraisal. Also, considering, Denton Park, a Georgian-designed landscape with notable surviving architectural features, views and planting, LGT agree and indeed support that it should be put forward for listing in The Register of Parks and Gardens held by Historic England. LGT would be able to assist background

					<p>research including, if permission of the owner will allow access, by undertaking a site survey to inform the necessary significance information.</p> <p>Regarding Paragraph 20 of this Review, 'Useful Contacts', it would be helpful to include Lincolnshire Gardens Trust website address, <a href="http://www.lincolnshiregardenstrust.org.uk">www.lincolnshiregardenstrust.org.uk</a> for contact details, as also those of The Gardens Trust:</p> <p>The Gardens Trust, 70 Cowcross Street, London EC1M 6EJ Tel (+44/0) 207 608 2409  Email <a href="mailto:conservation@thegardenstrust.org">conservation@thegardenstrust.org</a>  Yours sincerely,  Steffie Shields, Chairman, Lincolnshire Gardens Trust</p>
Alnwick Castle	Northumberland	E17/1648	I	<p>PLANNING APPLICATION Play village comprising cabins, chapel, hall, play structure and ancillary accommodation in a landscaped setting. Land North Of The Treehouse, The Alnwick Garden, Denwick Lane, Alnwick, Northumberland NE66 1YU. PLAY AREA</p>	<p><b>CGT WRITTEN RESPONSE 27.03.2018</b></p> <p>The Gardens Trust have forwarded correspondence regarding this resubmitted proposed development in March 2018. Analysis of the available historic mapping and other documentary sources shows that the valley where the development is proposed was clearly a significant part of the pleasure ground and parkland to the east of the castle from the second half of the eighteenth century onwards, making best use of the varying topography to display the changing views from the access rides out to the wider parkland along the river valley. A large built development in the heart of the eastern pleasure ground would sever the historic circulation routes; disrupt the historic division between pleasure ground and parkland; occupy an area intended to be open space in contrast to the planted surroundings; and is clearly not in the interest of preserving the physical remains and understanding of the historic designed landscape and the Northumbria Gardens Trust consequently objects to the proposal.</p> <p>The Archivist's Statement of January 2018, tacked onto the end of Appendix B of the Design &amp; Access Statement accompanying the planning application, is a welcome addition to the understanding of the evolution of the development site and its wider context. It is encouraging to see that use is increasingly being made of the important archive still held at Alnwick which will hopefully inform future development plans. The Archivist's Statement includes an account of 1785 by Peter Wadell of the circulation within the eastern pleasure</p>



					<p>ground, which combined with contemporary and later mapping gives a good idea of the intention behind the laying out of this part of the designed landscape.</p> <p>The Ordnance Survey Town Plan for Alnwick of 1851 [Old Maps website] shows two ponds in the valley to the east of the walled garden, presumably the piece of water with several foreign water fowl on it mentioned in the 1785 account and perhaps corresponding with the Gold Fish Pound and the uppermost fish pound in Barneyside mentioned in Thomas Call's 1769 letter to the Duke describing ongoing works [Archivist's Account, Appendix B, D&amp;A Statement ]. The ride eastwards from the castle along Barneyside remains within the northern boundary of the pleasure ground and passes into the valley to the north of the larger pond before turning southwards to the gate on Denwick Lane. A spur ride leaves this on the eastern side of the large pond and leads away north eastwards to circuit "Oak Grove" the further extent of the pleasure ground towards Denwick Bridge. A path winds upwards from the ride, presumably to the small rustic seat mentioned in the 1785 account, which as the account describes, would have had an excellent outlook back towards the castle and the river valley parkland and would indeed present a scene which at once charms and delights the spectator.</p> <p>[1785 manuscript 'Description of Alnwick Castle' by Peter Waddell - extract (p.22) in article by Dr Peter Willis in 'Capability Brown and the Northern Landscape', Tyne and Wear County Council Museums, 1983]</p> <p>Mackenzie confirms the effect of a walk through this part of the pleasure ground:</p> <p>A neat Gothic gate, on the eastern side of the castle, leads to Barnside, where a spacious gravel walk winds along a fine high ground, which to the left commands a wide and beautiful prospect. The right side is decorated with shrubs and flowers, through which a path leads to the gardens belonging to the castle, in which the forcing-houses are disposed in the most modern and approved style, and contain a choice collection of exotic fruits and flowers. Passing the gardens, the walk is inclosed on each side with overhanging trees; but to the right the eye is suddenly presented with an opening of a semicircular form, in which are two fish ponds and beautiful bowers. Leaving this sweet recess, the</p>
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					<p>walk passes through a pleasing grove of oaks, then turns to the left and leads to the margin of the AIn, on the opposite side of which is a neat corn mill, with castellated walls and in the Gothic style; and a little below is an elegant stone bridge with one light circular arch. [Mackenzie E. View of the County of Northumberland 2nd edition, vol.1, 1825]</p> <p>The mid nineteenth century sees some significant changes to the arrangement of the pleasure ground and parkland to the east of the castle with the addition (or at least mapping, given the earlier description, above) of rides crossing the parkland; some alteration of the boundary between pleasure ground and parkland and the removal of the ponds in the valley and re-alignment of the ride through the valley floor to the Denwick Lane gate.</p> <p>The First Edition of the Ordnance Survey 1:10.560 map [Northumberland (Old Series) Sheet XXXII, surveyed 1861 to 1864, published 1867] shows the rides in the pleasure ground and further rides across the parkland to the east of the castle which were laid out to provide a variety of views as the visitor moved around the designed landscape. One of the eastward rides is contained in the pleasure ground and leads towards the walled garden, providing shelter when required and no doubt a more intense scheme of planting along the way. The northern ride enters the parkland above "Barney Side" and runs eastwards along the contour, giving extensive views of the river valley and the parkland beyond. Where it starts to turn southwards, into the valley proposed for the current development, a branch leads off to the north to pass below "Barney Side" in the direction of the Lion Bridge. As the eastwards ride continues into the valley another branch leaves northwards to follow the contour along the eastern valley side below "Leek's Hill" before turning westwards to pass along the riverside close to the cascade and on to the Lion Bridge underpass. Within the valley the ride continues southwards into the pleasure ground and on to the gate on the Denwick road. Before it reaches the gate the ride within the pleasure ground leaves running north eastwards to circuit the higher ground to the east of Leek's Hill as before.</p> <p>The Second Edition of the O.S. plan [Northumberland (Old Series) Sheet XXXII.9 1897] shows the boundary of the pleasure ground extended</p>
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					<p>northwards to absorb the northern ride and some simplification of the drives (or at least their mapping) in the parkland to the south of the river. The subsequent edition [Northumberland (New Series) XXXV.2, Revised 1921, published 1923] shows additional planting in the valley advancing out to the revised boundary between pleasure ground and parkland.</p> <p>Yours sincerely, Harry Beamish, Chairman, Northumbria Gardens Trust</p>
Allerton Park	North Yorkshire	E17/1591	II	<p>PLANNING APPLICATION Erection of Agricultural Building. Allerton Grange Farm, Braimber Lane To Allerton Park Interchange, Allerton Park HG5 0SE. AGRICULTURE</p>	<p><b>CGT WRITTEN RESPONSE 14.03.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on behalf of both Trusts. We would be grateful if you could please take our comments into consideration when deciding this application.</p> <p>The application site lies within the Grade II registered park surrounding Allerton Castle, and we are pleased to see that the applicant has included a Heritage Statement for these applications. The Heritage Statement acknowledges that the proposed development will cause some minor harm to the historic landscape for at least half the year and the proposed building is still high (7.132m to ridge height) compared with the height of the walled garden which are traditionally in the region of 3m high, however this is a better located scheme than the previous application (17/05093/FUL; 17/05095/FUL; 17/05096/FUL). Any structure in the park setting or near a Listed Building will inevitably have some impact on the heritage assets but the proposed agricultural building, which is dark green clad with an anthracite coloured roof, will partly screen some other less desirable modern agricultural buildings.</p> <p>The YGT and GT neither objects nor supports this application but welcomes the slightly better location and the assessment of the Heritage Statement.</p> <p>Yours sincerely,</p>

					Val Hepworth Chairman
Allerton Park	North Yorkshire	E17/1592	II	PLANNING APPLICATION Erection of Agricultural Building. Allerton Grange Farm, Braimber Lane To Allerton Park Interchange, Allerton Park HG5 0SE. AGRICULTURE	<b>CGT WRITTEN RESPONSE 14.03.2018</b> See above
Blenheim Palace	Oxford shire	E17/1549	I	PLANNING APPLICATION Erection of storage barn. Park Farm House, Blenheim Park, Woodstock. AGRICULTURE	<b>CGT WRITTEN RESPONSE 19.03.2018</b> Thank you for the opportunity to comment on the above application. The Oxfordshire Gardens Trust has no objection in principle to the construction of a general storage barn in this location. However given that Blenheim Park is registered Grade I and has World Heritage status we consider that the opportunity should be taken, in relation to this development, of re-instating the missing trees to the gap in the shelter belt to the west of the site. As this is in line with the suggestion made (p.11) in the Heritage Statement accompanying the application we would strongly recommend that the re-planting of this gap with appropriate tree species should be made a condition of planning approval in this instance. Yours sincerely, Peter Edwards (on behalf of Oxfordshire Gardens Trust)
Hatch Court	Somerset	E17/0435	II	PLANNING APPLICATION Construction of Ha-Ha, reconfiguration of driveway and repositioning of fencing at Hatch Court, Frost Street, Hatch Beauchamp. BOUNDARY, ACCESS/GATES  OUTCOME 29.11.2017	<b>GT WRITTEN RESPONSE TO BRITISH DEER SOCIETY 13.03.2018</b> ... It would be intrusive and inappropriate for the Gardens Trust to presume to tell owners how to manage their deer herds, but where we could reasonably be expected to have a view, is the effect that deer numbers or their culling has on the management and landscape of historic deer parks. These parks have been specifically managed often for centuries, and their design and layout reflects this. Any substantial change to the status quo regarding the deer has a corresponding effect upon the landscape. I think that the way forward is for us to try to work together with appropriate organisations such as Historic England, the National Trust, The Georgian Group etc to formulate a protocol for any future planning applications which might conceivably affect a deer park. In such instances the BDS should also be notified to comment or advise

					<p>the owners accordingly. Our remit here is not with the deer but at least if the BDS and BDFPA are alerted they can act as they see appropriate since they have the specialist knowledge required.</p> <p>My view is that we have to use this sad case as a marker which has alerted us to a threat we had not really considered previously and now work together to ensure that nothing similar happens in future.</p> <p>With many thanks again,</p> <p>Best wishes Margie Hoffnung Conservation Officer The Gardens Trust</p>
Sheffield General Cemetery	South Yorkshire	E17/1565	II*	<p>PLANNING APPLICATION</p> <p>Conservation works to listed/non-listed historic features; walls/catacombs; and to listed/non-listed monuments, improvements to site entrance points, landscape improvements including general footpath improvements, installation of wayfinding signage, management of trees/vegetation, and improvement/inclusion of new amenities, lighting, and car parking. Sheffield General Cemetery, Cemetery Avenue, Sheffield S11 8NT. HYBRID</p>	<p><b>CGT WRITTEN RESPONSE 23.03.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on behalf of both Trusts. We would be grateful if you could please take our comments into consideration when deciding these applications.</p> <p>We are very pleased to support in principle these applications for the proposed conservation works to listed and non-listed historic site infrastructure and monuments in this outstanding example of a Victorian cemetery, which due to its condition has been included on the Heritage at Risk Register. We welcome the many excellent proposals which have emerged from a long and detailed study. However we do have serious concerns about the proposal for a car park to be sited within the grounds of this cemetery and the proposed future café associated with the car park.</p> <p>The proposed car park and café is in the north eastern section of the cemetery - the Anglican cemetery/New Cemetery - where 7,800 headstones/memorials were cleared in 1980 forming a 'public park' area, and we understand that the graves remain below ground. We consider that this proposal to site a car park on top of graves would be to many people highly disrespectful. Cemeteries were designed in the nineteenth century to "create sites fit for the dead and to evoke meaning and sacredness", also to create an idealized landscape, a</p>

					<p>"paradise". Whether there are graves in the site of the proposed car park or not, a new car park would completely fail to meet these criteria. In addition this area of the General Cemetery is currently a much appreciated green space; an important green lung for the many residents in this part of Sheffield who can walk to it and enjoy its quiet nature. This facility would be severely damaged by the proposals for a fourteen- vehicle car park and potential cafe. We note that the car park is proposed to be 'Pay and Display' which begs the question of the use of cemetery land for local authority income generation at the detriment of a peaceful historic green area of high community value.</p> <p>On the historic design, it seems likely that Robert Marnock, in addition to providing planting plans, advised William Flockton on the layout of the Anglican area so that his planting (Marnock's) would have maximum effect. (Conservation Plan 3.3.3). Certainly its path layouts, as shown in both the published 1852/3 OS map, and the later 1855 OS map (see the National Library of Scotland website), are characteristic of his style. The 1852/3 OS map shows the "bulbous" shape turning area that terminated the eastern end of the new principal central carriage drive. This feature had been removed by at the latest 1854 due to the carriage drive extension towards the eastern boundary, which met a new boundary path to the pedestrian entrance. In our view this shaped termination feature, which Marnock used in other places such as in his plan for Buckland in Surrey, 1871 (ref: The Garden, Dec 2 1871, p29), would be a more sympathetic design than the circular 'Feature Seating Area' proposed near the Montague Street entrance. This circular area lacks the subtlety of the c.1850 layouts which were based on asymmetry about the central axis east - west, (Central Avenue/Sandford Walk) with a sinuous perimeter path and similarly sinuous internal paths in a picturesque manner. It is not in a complimentary style to that of Marnock or the original 1850's layout, or to be a new feature that would preserve or enhance the character of this highly significant historic landscape.</p> <p>The Trust considers that the proposed car park would have a detrimental impact on the extension of the north eastern section boundary walk, which is shown routed through the proposed car park. In addition the proposed planting plan would only provide partial</p>
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					<p>screening of the car park and thus the car park would undoubtedly have a negative impact on the cemetery's historic landscape.</p> <p>We welcome the proposal to replace the present gate piers with "high quality ashlar sandstone piers" but in our view adding a new vehicle entrance nearby for the proposed new car parking will further downgrade this historic entrance. We suggest that the boundary walls could curve in to the entrance – this is currently somewhat the case with the northern arm into the entrance.</p> <p>Robert Marnock often designed junctions of paths with interesting tree and shrub planting; could this design feature be used again at Sheffield General Cemetery for example instead of the rather crude circle shown on the Masterplan in the south eastern corner at the junction of the paths?</p> <p>Although we understand the need for some disabled access in the cemetery and the difficulties of the steep gradients, we hope that a sensitive solution can be found for these users of the cemetery.</p> <p>The Trust is disappointed at the general lack of detail and information in these planning applications regarding tree removal and planting, hard landscaping, views etc particularly in relation to the proposed changes at the eastern end of the cemetery. Despite the cemetery being on the Historic England Register of Parks and Gardens of Special Historic Interest in England at Grade II* no assessment of the negative impact appears to be included in these applications.</p> <p>In conclusion, although we welcome many of the proposals which have the potential for significant enhancement of the Sheffield General Cemetery, we cannot support these applications for the reasons noted above. The Gardens Trust and the Yorkshire Gardens Trust wishes to register their objection.</p> <p>Yours sincerely, Val Hepworth Chairman</p>
Old Newton	Suffolk	E17/0391	N	PLANNING APPLICATION Outline planning application with Access, Landscaping and Layout to be considered for the erection of up to 56 dwellings with vehicular	<p><b>CGT WRITTEN RESPONSE 16.03.2018</b></p> <p>Thank you for alerting the Suffolk Garden Trust to this by your e mail dated 23 February. We are writing to object to this application. Our principal objections sent to Ian Ward on 12 July 2017 still comply and we would draw your attention to them and our original objection</p>

			<p>access from Finningham road, Old Newton. Appearance and Scale to be the subject of a Reserved Matters application. Finningham Road, Old Newton IP14 4EG. RESIDENTIAL</p>	<p>to the application 3814/16. Please consider these and bring them to the attention of any who may be considering this latest application. In summary :-</p> <ol style="list-style-type: none"> <li>1. The application does not comply with either local or national planning policy</li> <li>2. Our concern at the effect on Rookery Farm and its moats, surroundings in terms of the local landscape has been emphasised by the recent designation of the Rookyard Farm Moat as a Scheduled Ancient Monument</li> <li>3. There are other available sites in the village which provide better sustainability and better access.</li> </ol> <p>As before we urge your Council to reject this application. Yours faithfully Stephen Beaumont For and on behalf of the Suffolk Gardens Trust</p> <p><b>TGT WRITTEN RESPONSE 14.03.2018</b> The Gardens Trust wrote a response to the original outline planning application in November 2016 (copy attached). Despite the recent amendments our views are unchanged so we would be grateful if your officers could please include our original letter in the decision making process. Since then the moats have been listed as Scheduled Ancient Monuments which adds an even greater level of significance to an important historical site. The revised drawings we note were submitted just prior to the SAM designation (22<sup>nd</sup> January 2018). Online it is not easy to calculate the exact distances from the plans, and although the drawings show the development has been moved closer towards the village, at the SW corner of the moat they are still only approx 15m away. This will still have a very detrimental effect upon the setting and views back to and from the moat. The setting of the SAM and Grade II listed Rookyard Farm are further compromised by the entrance to the development being only 30m from the edge of the moat with large visibility splays, combined with the existing entrance to the field being only approx 10m further along, giving a very busy cluttered feel to what had previously been a rural situation. The Gardens Trust objects to this application.</p>
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					Yours sincerely, Margie Hoffnung Conservation Officer The Gardens Trust
Sutton Place	Surrey	E17/1671	II*	PLANNING APPLICATION and Listed Building Consent Erection of a replacement brick wall and timber gates following demolition of existing wall and gates. Ladygrove Farm House, Sutton Park, Sutton Green, Guildford, Surrey GU4 7QL. BOUNDARY	<b>CGT WRITTEN RESPONSE 23.03.2018</b> This comment is made on behalf of Surrey Gardens Trust a member of the Gardens Trust, the Statutory Consultee. The submitted Heritage Statement adequately addresses the Registered site of Sutton Park and its conclusion that there would be no significant impact from the historic parks and gardens point of view is accepted. Don Josey Surrey Gardens Trust
Sutton Place	Surrey	E17/1700	II*	PLANNING APPLICATION Provision of two new car parking spaces. Orchard House, Sutton Park, Sutton Green, Guildford, Surrey GU4 7QL. PARKING	<b>CGT WRITTEN RESPONSE 31.03.2018</b> This comment is submitted on behalf of the Surrey Gardens Trust. The proposed car parking spaces are within the established residential cluster and will have no significant impact on the historic parks and gardens interests. Don Josey
Cannon Hill Park	West Midlands	E17/1635	II	PLANNING APPLICATION Construction of a Memorial to the Victims of the 2015 Sousse and Bardo Terrorist Attacks within Cannon Hill Park, Birmingham incorporating a permanent sculpture and hard and soft landscaping works to the surrounding area. The purpose of the Memorial is to provide a permanent tribute to those who lost their lives in the atrocious attacks in Sousse and Bardo and to offer a place of remembrance, commemoration and reflection for all those affected. The design for the memorial was chosen following a design competition	<b>GT WRITTEN RESPONSE 13.03.2018</b> Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks & Gardens, as per the above application. We have liaised with our colleagues in the Parks Agency, and feel that the proposed sculpture would not be widely visible in this sheltered location. We would suggest that the access path to the site be in a suitably high quality material, but apart from that, we are happy to support the siting of this memorial. Yours sincerely, Margie Hoffnung Conservation Officer The Gardens Trust

				<p>run by the Foreign &amp; Commonwealth Office with input from a panel of experts including representatives from Birmingham City Council Parks Department. Cannon Hill Park, Russell Road, Moseley, Birmingham B13 8RD. SCULPTURE/MONUMENT</p> <p>OUTCOME 14.03.2018 Approved</p>	
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