



## CONSERVATION CASEWORK LOG NOTES MAY 2018

The GT conservation team received 161 new cases in England and 2 cases in Wales during May, 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, 19 'No Comment' responses were lodged by the GT and 8 by CGTs in response to planning applications included in the weekly lists.

Site	County	GT Ref	Reg Grade	Proposal	Written Response
<b>ENGLAND</b>					
National Planning Policy Framework		E18/0179	n/a	NATIONAL POLICY National Planning Policy Framework revision	<p><b>CGT WRITTEN RESPONSE 09.05.2018</b></p> <p>Buckinghamshire Gardens Trust (BGT) is a Registered Charity with over 20 years of conservation experience relating to designed landscapes in historic Bucks (including Slough and Milton Keynes Districts). Our advisory volunteers have included during those years, and still include, a number of professionals in the heritage and planning sectors with great depth of experience in the policies and practicalities of the conservation and restoration of both designed landscapes and buildings.</p> <p>We have reviewed the draft of the revised document with reference to the original NPPF and offer the following comments on the revised text of the NPPF. Comments are offered in the light of our experience and of engaging in many cases with those who are within and outside the heritage, development and planning sectors, their responses to guidance, and in particular the first edition of the NPPF.</p> <p>Under the headings addressed below we highlight the most obvious areas in the draft document in which it does not give full weight, or</p>

apply appropriately, to designed landscapes, which are a poorly understood and under-resourced historic asset type compared with buildings and monuments. If planning policy is to ensure in decision-making that designed landscapes, a heritage asset type that is seminal in English culture, receive full consideration and guidance, this document must include a much more explicit and frequently-stated approach.

1. Generally, we welcome the increased references throughout the NPPF to green infrastructure and open space, and also the increased protection afforded to ancient woodland/veteran trees. 2. Our most important general comment on the document in its entirety is a fundamental issue raised with regard to the relative status of heritage policy within the draft NPPF. The heritage policy itself seems largely the same, but the context within which it will operate is very different – see particularly new paragraph 11 and surrounding text: the definition of sustainable development is changed through the cumulative effect of a number of individually minor wording changes. The net effect promotes the economic element of sustainable development at the expense of the social and environmental. This major change in status of heritage policy will make it very difficult to ensure that heritage will be appropriately weighed in the balance (as it is/can be now) if this text is retained. RECOMMENDATION: Revisit wording changes to ensure that a strong approach to the historic environment is clearly and robustly set out.

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policy will make it very difficult to ensure that heritage will be appropriately weighed in the balance (as it is/can be now) if this text is retained. RECOMMENDATION: Revisit wording changes to ensure that a strong approach to the historic environment is clearly and robustly set out.

3. Reference to Designed Landscapes as Heritage Assets. Our most important specific comment is that there is virtually no reference to designed landscapes and that this should be rectified. This form of heritage asset, which as a heritage asset type is seminal in English culture, is already poorly understood and therefore easy to neglect or regard as peripheral or ancillary to a more easily identifiable historic asset (buildings). It is also particularly vulnerable in the planning system to a perception that it can be sacrificed more easily to ensure that the future of other heritage assets such as buildings, often of similar significance levels, is assured. We urge that RECOMMENDATION: Explicitly mention designed landscapes throughout this document to ensure that they are given specific consideration at the various relevant points.

4. Terminology throughout the document referring to historic designed landscapes is outdated. Reference throughout the document to 'parks and gardens' is outdated and ignores other recognised types of designed landscapes. These include cemeteries and crematoria, housing estates, civic landscapes, archaeological sites, model villages, plant collections, power stations, landscapes of transport, hospital and asylum grounds, memorial landscapes, and others.

RECOMMENDATION: Adopt the term 'designed landscapes' instead of 'parks and gardens' throughout the document, this being a more inclusive and relevant term.

5. Local Lists. Locally significant designed landscapes must be specifically mentioned as a type as of considerable value, and worthy of identification as part of local lists and in consideration in planning procedures as well as nationally significant sites which appear on the Historic England Register of Parks and Gardens. Both locally and nationally significant designed landscapes deserve far more weight and exposure because as a group they contribute a major part of the landscape character of both the urban and rural environment within

local character areas such as counties, and also more widely across the whole of England (and indeed the UK). BGT's own Research and Recording Project has recorded a wide range of over 60 locally significant sites since 2013 to a high and rigorous standard based on the Historic England Register methodology. The resulting site dossiers, used by Bucks County Council HER and by planning authorities to inform decisions, have proved that all the sites addressed have considerable county-wide interest, and a number are of national significance although not all are yet recognised as such by Historic England.

**RECOMMENDATION:** State clearly in Section 16, and elsewhere as relevant, the considerable importance of locally significant designed landscapes as a type. State that these sites are worthy of identification within local heritage lists and in consideration in planning procedures.

**6. Significance Categories Lack Definition.** We welcome the continued definition of the NPPF Significance categories (Architectural, Archaeological, Artistic and Historic Interests). However we urge that the definitions of these interests (which were defined in PPS5) are clearly reinstated to inform planning authorities and applicants. The current and draft versions of the NPPF define only archaeological interest in the Glossary, and the draft NPPF reduces that by half.

**RECOMMENDATION:** Reinstate in full the definitions of the 'Significance (for heritage policy)' categories in Annex 2 Glossary as per the first edition.

**7. Significance Categories Do Not Apply Well to Designed Landscapes.** From considerable experience, we have observed that the sector volunteers, professionals, heritage owners and managers that we deal with find the NPPF categories relatively clear and easy to understand. Even so, it should be noted that the NPPF categories do not relate comfortably to designed landscapes. They do not point towards the definition of the unique significance categories of landscapes particularly ornamental planting design, scientific and designed plant collections, man-made landform and water features, designed views and approaches. The Artistic Interest is the most closely applicable to designed landscapes but individual aspects including those noted above are not an easy fit. Again, designed landscapes do not receive the individual reference that they deserve. Given the international

				<p>influence and significance of English designed landscapes as a group (mentioned above), we urge an additional category is included covering this aspect. RECOMMENDATION: Introduce an additional category to the 'Significance (for heritage policy)' categories in Annex 2 Glossary, including a full definition, which is comparable to those of the other four categories (see item 6 above).</p> <p>8. Specific Omissions: We are disturbed to find that reference to certain aspects and paragraphs of the old edition have been omitted which have particular relevance to the historic environment including designed landscapes. This is of particular concern, as removing important information or signposting readers to other documents reduces the likelihood of particular issues being considered. If such references are harder to find, they will just be by-passed.</p> <p>Omissions of particular relevance to designed landscapes include references in the old paragraphs:</p> <ul style="list-style-type: none"> <li>• 9 (positive improvements in the built, natural and historic environment)</li> <li>• 157 (identifying land where development would be inappropriate because of its historic significance)</li> <li>• 169 (local plan evidence)</li> <li>• 170 (landscape character assessment)</li> </ul> <p>• Article 4 has been omitted along with the definition of the historic environment</p> <p>• In Chapter 2, the core principles have been removed and instead scattered throughout the document. See 182 for the conservation text, for instance. This is a considerable loss: setting them out together brought unity and a reminder of all key policy areas from the outset.</p> <p>The above matters should be clearly laid out in this document as core policies even if they are covered in other documents. We urge that coverage is reintroduced in the revised text. RECOMMENDATION: Reinstate old paragraphs 9, 157, 169 and 190, Article 4 and set out the core principles in Chapter 2.</p> <p>In addition frequently applicants include token reference to phrases in the NPPF or Conservation Principles in a Design and Access Statement without explaining how that relates to or influences their application and explaining their justification for specific changes which will damage the historic environment. RECOMMENDATION: Set out clearly the need for a sufficient and rigorously applied level of information in supporting information with applications. Where inadequate levels of information</p>
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regarding significance and impact are received guide planning authorities to insist on revisions and resubmission to provide this sufficient level of information.

9. Speed of Decision-Making & Advice from Statutory Consultees: We regret the reference in Para. 48 to decisions being made 'as quickly as possible' as this is likely to be damaging to the consideration of specialist information, including designed landscapes. Designed landscapes are quickly lost or compromised and cannot be as quickly repaired and rarely replaced. As part of the process, planning authorities should be guided to appraise such specialist information critically, including the level of detail required to understand fully the significance and impact on significance, and rigor of methodology adopted. As part of this they may take advice on these specialist matters from Statutory Consultees and local experts such as County Gardens Trusts. If the information supplied by the applicant does not fulfil the requirement to make a fully informed decision the NPPF should guide that the Planning Authority should as a matter of course insist on additional information. This will of course slow down the decisionmaking process but will ensure that irreversible mistakes in decision-making are avoided. RECOMMENDATION: In Para. 48 remove the phrase 'as quickly as possible'. Require applicants to research and prepare adequately and to justify why their proposals should be permitted where there is a significant impact, however subtle, on a designed landscape.

RECOMMENDATION: Emphasize the role of Statutory Consultees and other local expert bodies more explicitly as a valuable source of expert advice.

10. Summary of Our Comments: We welcome the revised document and its approach to heritage assets including to designed landscapes but find that: a) it does not offer the level of consideration and exposure that this heritage asset requires, and b) nor in the light of the changes to wider policy, does it give the appropriate weight to heritage matters more generally. Under the headings above we highlight the most obvious areas in which it does not give full weight, or apply appropriately, to designed landscapes, which are acknowledged as a poorly understood and underresourced historic asset type compared

					<p>with buildings and monuments. If the government is committed to the full consideration of designed landscapes in the planning process, which as a heritage asset type is seminal in English culture, it should consider seriously a much more explicit approach in the document. This need not take up significantly more space, but prevents designed landscapes continuing to be overlooked and often damaged unnecessarily as a result. RECOMMENDATION: Throughout the document increase proportionately the level of exposure, emphasis and consideration for designed landscapes alongside other heritage assets and within the wider context.</p> <p>We hope that you will be able to incorporate the recommendations made in these comments.</p> <p>Yours sincerely,  Dr Sarah Rutherford  Chairman, Bucks Gardens Trust, on behalf of the Planning Group</p> <p><b>TGT WRITTEN RESPONSE 09.05.2018</b></p> <p>I have seen the comments sent to you from the Buckinghamshire Gardens Trust with regard to amendments in the new draft text. It would be difficult to put it any better than Dr Rutherford, so I would like to endorse entirely the comments made by her. I am attaching another copy of her letter for convenience.</p> <p>Yours faithfully,  Margie Hoffnung  Conservation Officer  The Gardens Trust</p>
The park and garden to Brislington House (known as Long Fox Manor)	Avon	E18/0249	II	PLANNING APPLICATION Provision of a new sports pitch and associated site recontouring. St Brendans Sixth Form College, Broomhill Road, Bristol BS4 5RQ. SPORT/LEISURE, EDUCATION	<p><b>CGT WRITTEN RESPONSE 30.05.2018</b></p> <p>Thank you for consulting Avon Gardens Trust about this application for the provision of a new sports pitch and associated site re-contouring. The site was an early C19 landscape laid out to accompany a purpose built private lunatic asylum. The therapeutic use of the grounds at Brislington House and their layout were influential on the development of later C19 establishments for the treatment of mental illness. The site is identified as a Registered Park and Garden Grade II*. However, the Sixth Form College site, which encompasses the planning application area, used to form part of the Registered Park and Gardens</p>

					<p>designation. This has since been removed from the designation. The Grade II listed buildings associated with Brislington House are well screened from the site by mature trees. We therefore consider that the proposals will lead to less than substantial harm to the significance of the heritage asset. Consequently we raise no objection to this application. However, if you have any further queries, please contact us at the address at the head of this letter.</p> <p>Yours sincerely        Ros Delany (Dr)        Chairman, Avon Gardens Trust</p>
Warmley House	Avon	E18/0261	II	PLANNING APPLICATION Construction of 8no hardstanding bases for caravans. Kingsway Park Tower Lane, Warmley, Bristol, South Gloucestershire BS30 8XW. CAMPING	<p><b>TGT WRITTEN RESPONSE 28.05.2018 (INTERIM COMMENT)</b></p> <p>The above application has just been drawn to our attention. It is unfortunate that South Glos failed to notify us, as the Gardens Trust is the statutory consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. Since this application came out some time ago, and as far as I can see, has not yet been decided, I would be most grateful if you could please give us an extension to enable us to respond appropriately? We would appreciate the normal 21 day period. I will liaise with my colleagues in the Avon Gardens Trust and have also notified the Folly Fellowship about this application. I am attaching a copy of our leaflet The Planning System in England and the Protection of Historic Parks and Gardens - Guidance for Local Planning Authorities.</p> <p>Best wishes,        Margie Hoffnung        Conservation Officer        The Gardens Trust</p>
Burton Manor	Cheshire	E18/0132	II	PLANNING APPLICATION Change of use of Burton Manor to offices, construction of 17 new dwellings, demolition of accommodation block, community cafe/shop and associated landscaping works. Burton Manor College, The Village, Burton, Neston CH64 5SJ.	<p><b>TGT WRITTEN RESPONSE 22.05.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development within a site included by Historic England on their Register of Parks &amp; Gardens, as per the above application. We have liaised with our colleagues in the Cheshire Gardens Trust (CGT) and we would be grateful if you could please take our comments into consideration when deciding this application. We are glad that serious efforts are being made to establish a viable</p>

				CHANGE OF USE, RESIDENTIAL	<p>future for Burton Manor, a property which encompasses a number of Heritage assets and whose future has been of concern to us since the Association of Gardens Trusts visited Burton Manor as part of its Annual General Meeting in 2014.</p> <p>We appreciate that the scheme involves repair, restoration and demolition, and new development to fund the conservation deficit. The scheme has been carefully considered, seeks to conserve significance and ensure the sustainability of the historic buildings and designed landscape. We support this application in principle but have some concerns regarding the following:</p> <ul style="list-style-type: none"> <li>• From information available it appears that proposed houses 12, 13 and 14 lie very close to the rockery, their gardens encompassing the rockery path. This path is not shown as being a 'Friends of Burton pedestrian route access' on the Sketch Master Plan. We consider this path to form part of the circuit whereby visitors can experience the full diversity of the gardens. It is an area that contrasts with the formal garden spaces designed by Mawson.</li> <li>• The arboricultural survey identifies two 'notable and unusual specimens' of tree rhododendron (224 and 225), as well as other category A1 trees and many trees of lesser quality or ones requiring work. It is not clear from the information provided which trees are to be lost due to construction, and whether trees 224 and 225 are amongst them. The proposed housing encroaches on the woodland far more than the existing buildings and there is a lack of clarity concerning proposals for replacement or mitigation.</li> </ul> <p>We would request that any approval is conditional on the submission of detailed landscape proposals and a comprehensive landscape management plan appropriate to a Registered Park &amp; Garden, as well as conditions to control future alterations to the houses and their boundaries so that landscape character is respected and the quality of the development maintained.</p> <p>Yours sincerely,  Margie Hoffnung  Conservation Officer  The Gardens Trust</p>
Doddington Hall	Cheshire	E18/0181	II	PLANNING APPLICATION Outline	<b>TGT WRITTEN RESPONSE 21.05.2018</b>

			<p>application for development of 12 no. sites for residential development for 112 no. dwellings with means of access and layout included, but with all other matters reserved, for a 10 year phased release and delivery period and associated community betterment (parking overspill next to School, enhanced parking next to Church permissive pedestrian paths, play space, public access, community orchard, educational contribution and affordable housing). [Resubmission of 16/5719N : addition of extra 2.81 ha of land and 10 no. dwellings].</p> <p>DODDINGTON ESTATE, BRIDGEMERE, NANTWICH, CHESHIRE CW5 7PU. MAJOR HYBRID</p>	<p>Thank you for consulting The Gardens Trust in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England on their Register of Parks &amp; Gardens, as per the above application. We have liaised with our colleagues in the Cheshire Gardens Trust and would be grateful if you could please take our comments into consideration when deciding this application.</p> <p>We considered the previous application 16/5719N and commented 8th January 2017.</p> <p>The Masterplan indicates that proposed housing site 1 lies adjacent to the boundary of the Registered Park and Garden (RPG). Appendix 5, Viewpoint photographs, indicates that proposed sites 1 and 3 will be visible from the RPG. Though the applicant has stated that it was agreed that 'new development must not encroach on heritage assets' (p.16), we consider that these sites will encroach visually and have a negative impact on the significance and character of the historic landscape and setting of the Grade I listed Hall.</p> <p>We repeat our comment made previously that decision making on this application would be more accurately informed if the "full Historical Assessment of the historic park and garden, detailing, inter alia, the involvement of Capability Brown in the original design, layout and construction, by a suitably qualified expert" as conditioned under application 14/5654N item 14 were made available.</p> <p>The Gardens Trust feel that the notice of refusal for the previous application also applies in this revised application: "It is considered that the positive planning benefits for the conservation of the heritage assets does not outweigh the harm that would be caused by the proposed residential development in the open countryside and by the lack of social/community benefits to be provided by the development. This will result in an unsustainable form of development that is contrary to policies PG7 Open Countryside, SC5 Affordable Housing, and IN2 Development Contributions of the Cheshire East Local Plan Strategy, RES.5 of the Crew and Nantwich Replacement Local Plan, and the National Planning Policy Framework."</p> <p>We therefore OBJECT to this application and would be grateful if you could please let us know the outcome of this application.</p> <p>Yours sincerely,</p>
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					Margie Hoffnung Conservation Officer The Gardens Trust
Littley Park	Essex	E18/0141	N	PLANNING APPLICATION and Listed Building Consent Conversion of four existing partially attached agricultural barns to single dwelling house including, two single storey rear extensions, single storey glazed link and internal and external alterations. Site At Barns North Of Littley Park Lane, Great Waltham, Chelmsford, Essex. RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 03.05.2018</b></p> <p>The Essex Gardens Trust, representing The Gardens Trust, the statutory consultee on historic gardens, parks and landscapes, objects to application 18/00680/FUL and 18/00681/LBC.</p> <p>Littley Park is recorded from the 13th century. It was one of the parks of Pleshey Castle. With the castle, the park passed from the de Bohun family to the duchy of Lancaster in the 15th century, but by the 16th seems to have been in the possession of the Warner family who owned an adjacent manor. In the 1550s, it was acquired by Richard Lord Riche who extended it northwards to connect it to his mansion at Leez Priory, increasing its area to about 260 hectares. The southern part of the park had been converted to farmland by the early 18th century, and the rest had become a tenanted farm by the end of that century. The park, however, remains a landscape feature, its perimeter respected by the surrounding road system and recognisable from traces of banks and ditches. From south to north it is traversed by the Causeway, the ceremonial approach laid out by Lord Rich to Leez Priory, and now a bridleway. This was given prominence by being on a low raised bank which assisted with the crossing of the Chelmer flood plain and enhanced the views on the approach to Leez Priory. One of Lord Rich's descendants in the 17th century planted it with an avenue of elms, of which some huge dead pollards survive. The grade II listed Littley Park Farm, dating from the 15th century, is the former park lodge. With its farm buildings, it is the principal, indeed the only, building within the former park. The 16th century Crowgate Cottage at the southern end of the Causeway was probably built for a ranger or gatekeeper.</p> <p>Although not on the national register of historic landscapes and gardens, Littley Park is included in the Essex Gardens Trust Inventory for the City of Chelmsford of landscapes which make a valuable contribution to the county's landscape and heritage. It is an undesignated heritage asset and a material consideration in determining planning applications. The heritage statement attached to the application shows only a very limited understanding of the</p>

					<p>landscape, which should be more fully assessed.</p> <p>In principle, there is no objection to the conversion to this historic group comprising a timber stable, a brick building of apparently Tudor date to judge from its brickwork, an 18th/19th barn with an attached single storey blockwork shed. These are established features of the landscape. The brick building looks like a non-standard structure which was probably associated with the use of the park, and hence is potentially of great interest and importance, and should be fully recorded and assessed before any conversion takes place. The building is not a stable as suggested in the heritage statement, which contains several inaccuracies. These buildings, including the equipment in the barn, should be properly recorded prior to any works. Whilst conversion should ensure the preservation of these buildings, it is important that is sensitive to avoid damage to their character as well as to the landscape setting. I do not consider that it achieves that, and would recommend the refusal of the application in its present form.</p> <p>I would make the following points:</p> <ul style="list-style-type: none"> <li>' Re-roofing all the buildings in slate would neither be appropriate or attractive</li> <li>' Large areas of glazing are proposed, which can look alien in a rural setting</li> <li>' The same observation applies to the glazed link to the Tudor brick building</li> <li>' There seems little justification for enlarging the footprint of the barn with a second glazed conservatory in view of the size of the potential accommodation in the buildings</li> <li>' Since there would be no garaging or storage, it would seem obvious to use the southern brick and block 'cow shed' as a garage, to avoid any subsequent need for outbuildings</li> </ul>
Littley Park	Essex	E18/0142	N	PLANNING APPLICATION Conversion of 3 barns to 3 dwelling houses. Site At Barns North Of Littley Park Lane, Great Waltham, Chelmsford, Essex. CHANGE OF USE, BUILDING ALTERATION, RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 03.05.2018</b></p> <p>The Essex Gardens Trust, representing The Gardens Trust, the statutory consultee on historic gardens, parks and landscapes, objects to application 18/00679/FUL.</p> <p>Littley Park is recorded from the 13th century. It was one of the parks of Pleshey Castle. With the castle, the park passed from the de Bohun family to the duchy of Lancaster in the 15th century, but by the 16th</p>

seems to have been in the possession of the Warner family who owned an adjacent manor. In the 1550s, it was acquired by Richard Lord Riche who extended it northwards to connect it to his mansion at Leez Priory, increasing its area to about 260 hectares. The southern part of the park had been converted to farmland by the early 18th century, and the rest had become a tenanted farm by the end of that century. The park, however, remains a landscape feature, its perimeter respected by the surrounding road system and recognisable from traces of banks and ditches. From south to north it is traversed by the Causeway, the ceremonial approach laid out by Lord Rich to Leez Priory, and now a bridleway. This was given prominence by being on a low raised bank which assisted with the crossing of the Chelmer flood plain and enhanced the views on the approach to Leez Priory. One of Lord Rich's descendants in the 17th century planted it with an avenue of elms, of which some huge dead pollards survive. The grade II listed Littley Park Farm, dating from the 15th century, is the former park lodge. With its farm buildings, it is the principal, indeed the only, building within the former park. The 16th century Crowgate Cottage at the southern end of the Causeway was probably built for a ranger or gatekeeper. Although not on the national register of historic landscapes and gardens, Littley Park is included in the Essex Gardens Trust Inventory for the City of Chelmsford of landscapes which make a valuable contribution to the county's landscape and heritage. It is an undesignated heritage asset and a material consideration in determining planning applications. The heritage statement attached to the application shows only a very limited understanding of the landscape, which should be more fully assessed. The conversion of the three modern farm buildings at Littley Park Farm would in effect create a small settlement at the heart of the former park and would affect its character. It is argued in the application that the Farm would be diminished without its buildings. However, the listed building is already part of a sizeable complex of buildings which read as a farmstead, never mind the range of old curtilage listed buildings which are the subject of a separate application. The conversion of the buildings would leave them no longer legible as a farmstead, but as a group of structures with wide spans and low roof pitches clad in

					<p>materials alien to the rural setting, apparently representing a new incongruous development. The impact on the setting of the landscape and the listed buildings would increase with the use of amenity areas, parking and the access road. The plans are not very informative about the amount of hard standing around the proposed buildings. No provision is made for outbuildings or storage, and it is predictable that there would in future be a demand for cartlodges or similar. It is difficult to believe that the development would comply with local policy DC2 in having a materially lesser impact on the openness appearance and character of the surrounding area. For the same reasons, it can be argued that it would be contrary to DC57, to which it can be added that the permanence of the cow barn is questionable, that the lack of storage means the conversion cannot be achieved within the existing envelopes, and that the appearance of the reclad buildings, particularly as a group, would not be in keeping with the rural setting. The proposed development would also affect the setting of the listed farmhouse, challenging its dominant role in the park landscape, inasmuch as the houses would no longer be read as agricultural buildings. In terms of the National Planning Policy Framework, the planning authority has to weigh damage to the significance of heritage assets, which here lies particularly in their setting, against any public benefits which here are difficult to identify.</p>
The Manor House, Stansted	Essex	E18/0195	N	PLANNING APPLICATION Outline application, with all matters reserved except for access, for 1 no. dwelling with associated parking. The Manor House, Church Road, Stansted. RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 16.05.2018</b></p> <p>Stansted Hall or Manor is a grade II listed building set in a parkland setting which was enhanced by Humphrey Repton, whose anniversary falls this year. The landscape is not registered on the National Heritage list, but is included in the Essex Gardens Trust's Inventory for the Uttlesford District. We wish to object to this application. Outline applications are generally not regarded as acceptable in principle in sensitive settings such as this. No indication is given as to what type of house might be constructed, but it is predictable that the aspiration would be for as large a one as possible. The site of the tennis court has presumably been selected as it could be considered 'brownfield'. However, it would have a footprint which projects assertively into the land associated with the Hall, such that a house in this location would be an intrusion into the landscape, reading as quite separate from the</p>

					complex of structures round the Hall and also the lane. Regards David
Westonbirt	Gloucestershire	E18/0178	I	PLANNING APPLICATION Full Application for Retention of two temporary classroom buildings (Variation) of condition 1 of permission 15/01551/FUL to retain the buildings for a further period of 3 years) at Westonbirt School Westonbirt Tetbury Gloucestershire GL8 8QG. EDUCATION	<b>CGT WRITTEN RESPONSE 10.05.2018</b> Dear Ms.Donnelly, This proposal for a three year extension of the original three year temporary consent for two temporary classrooms at Westonbirt School, has been referred to the Gloucestershire Gardens and Landscape Trust (GGLT) for comment. As I recall, the Trust was not overly enthusiastic when consulted in 2015, but one can appreciate the problems of the School funding well designed permanent buildings. The Trust would not wish to raise an outright objection, but there comes a time when these buildings will assume a permanent status. CDC should bear this in mind when conditioning this further extension of time. Yours sincerely, David Ball, (on behalf of GGLT)
Hatherop Castle	Gloucestershire	E18/0280	II	PLANNING APPLICATION Proposed erection of fishing lodge. Land To East Of River Coln, Quenington, Gloucestershire. MISCELLANEOUS	<b>CGT WRITTEN RESPONSE 30.05.2018</b> Gloucestershire Gardens and Landscape Trust (GGLT) has been consulted on this proposed development via The Garden Trust, which is the Statutory Consultee for proposals that might have impact on Listed and Registered gardens and Landscapes. The fishing lodge is to be sited against the woodland on rising ground that separates this area of Hatherop Castle's parkland from the eastern section. Within the wider Colne landscape this proposal should not create an undue visual impact on the riverside environment or the overall Hatherop listed parkland. Any decision will depend on the Planning Committee's judgement on the detailed design of the fishing lodge. Yours sincerely, David Ball, (on behalf of GGLT)
Broomfield House	Greater London	E18/0220	II	PLANNING APPLICATION Creation of a wetlands area (1500sqm) involving increase in height of bund by 0.8m, restoration of	<b>TGT WRITTEN RESPONSE 28.05.2018</b> The Gardens Trust (GT) was notified about this application by Historic England rather than by Enfield. We are disappointed that despite our Statutory Consultee role with regard to proposed development

			<p>water feature together with associated landscaping to the south east corner of the park. Broomfield Park, Broomfield Lane, London N13 4HE. WATER FEATURE</p>	<p>affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, Enfield failed to notify either us or the London Parks &amp; Gardens Trust (LPGT) of this application which is actually within an RPG. We are attaching a copy of our leaflet The Planning System in England and the Protection of Historic Parks and Gardens : Guidance for Local Planning Authorities, and would be very grateful if you could ensure that in future we are notified of any similar applications. We have liaised with our colleagues in the LPGT and would be grateful if you could take our joint comments into consideration when deciding this application.</p> <p>The Park is included on the LPGT Inventory :</p> <p><a href="http://www.londongardensonline.org.uk/gardens-online-record.php?ID=ENF005">http://www.londongardensonline.org.uk/gardens-online-record.php?ID=ENF005</a></p> <p>This entry shows that not only is the Park itself Grade II listed but is the setting of several grade II* historic features including Broomfield House; remains of C16-18th east wall with attached early C18th pavilion/garden house &amp; stableblock. Additionally the site is part of Metropolitan Open Land and in a Nature Conservation Area of Local Importance.</p> <p>It is not apparent from the documentation online why Broomfield Park was chosen as the site for this SUDs scheme. There is nothing to indicate whether other less sensitive sites were considered, even if they were eventually deemed unsuitable, and if so for what reason(s). The two proposed SUDS wetland cells and their and decking bridge sit uneasily in relation to the historic walls (Visualisation Fig 3, Planning Statement, p5) and the formal lime avenue, and are alien in character and appearance to the smooth 'parkland' grass which currently borders these features. Indeed the Heritage Statement 3.6.16 stresses the "relationship between the House, formal gate and parkland form the setting of Broomfield House. The setting makes a high contribution to the importance of Broomfield House." Introduction of wetland cells with their associated informal bog/damp planting/landscaping would considerably alter this key historic setting, and therefore would have a correspondingly negative effect upon the significance of the RPG. We disagree with Para 4.1.6 in the Heritage Statement which states that "it is considered that there will be no impact upon the setting of the</p>
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surrounding heritage assets, including Broomfield House (Grade II\*), walls associated with Broomfield House/Park Grade II) ..." The undoubted harm caused to the Grade II RPG (see NPPF Para 132) is not given any clear and convincing justification within the application documents. The GT/LPGT remain unconvinced that "The public benefit of the flood alleviation scheme to reduce flood risk ... is considered to outweigh the minimal harm caused to the Heritage Asset." (Heritage Statement 4.1.7.).

The GT/LPGT are unclear as to the level of flood alleviation/water storage required. We would have liked clarification of the capacity of the existing lakes and stemming from this, a SUDs scheme designed proportionately so that the RPG and its constituent fabric/features are not harmed (NPPF Para 132 – great weight should be given to the conservation of irreplaceable heritage assets). The impression given by the available documentation is that this scheme is SUDs-driven rather than considering the overall benefits, which include public amenity value. Broomfield House and its Stable Block are already on the HAR register for London, and any further erosion to their fragile setting can only have a negative impact upon their significance.

The GT/LPGT also have concerns relating to the ongoing management of the area and the provision of funding for the future maintenance of the decking/bridge. We can see this potentially falling into disrepair in a short timescale (it will attract vandalism). Since the Friends of Broomfield Park already undertake much of the maintenance of the Park and do not have capacity to take on more responsibility for core maintenance tasks we would like assurance that Enfield has sufficient budget for the increased maintenance this potential new feature will entail.

The GT/LPGT would prefer to see the funding from Thomas21 and the Mayor of London being put to use for a SUDs scheme in a less sensitive site, or with a scheme that involves proper consideration of the heritage sensitivities of this site. We therefore OBJECT to the application as it currently stands.

Yours sincerely,  
Margie Hoffnung  
Conservation Officer

					The Gardens Trust
Hatfield House	Hertfordshire	E18/0140	I	PLANNING APPLICATION Submission of details pursuant to condition 1 (painting of external walls), 2 (areas for treatment to be marked), 3 (details regarding repairment), 4 (no removal of historic lime plaster), 5 (details of timescales) and 6 (historic timbers), on planning permission 6/2017/1247/LB. Bush Hall Hotel, Chequers, Hatfield AL9 5NT. MISCELLANEOUS	<b>CGT WRITTEN RESPONSE 18.05.2018</b> Have a ticked the 'Support' box for 6/2018/1062/COND for restoring historic fabric. Bush Hall has a little local landscape of its own but is in the setting of Hatfield House. Herts Gardens Trust
Princes Park, Liverpool	Mersey side	E18/0172	II*	PLANNING APPLICATION To install new bridge between the main park and the island and to erect a permanent public memorial to Nelson Mandela on the island. Princes Park, Ullet Road, Liverpool 8. BRIDGER, SCULPTURE/MONUMENT	<b>CGT WRITTEN RESPONSE 29.05.2018</b> Thank you for consulting The Gardens Trust on the above application. 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 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 at <a href="http://www.thegardenstrust.org">www.thegardenstrust.org</a> . The Lancashire Gardens Trust (LGT) therefore responds in this case. We have reviewed the application documentation, but not visited the site. It is noted that the application site occupies a prominent location within the Grade II* Registered Princes Park, which lies within the Sefton Park Conservation Area. The LGT supports the investment Liverpool City Council is making in restoring and enhancing Princes Park. We also support the aspirations of the current application and welcome the processes through which the proposals have emerged. However this is a Full Planning Application and there are a number of points of detail which are not adequately resolved. Our principal comments are as follows: <ul style="list-style-type: none"><li>• Bridge design on drawing 1708 is unresolved and no indication is given of abutment detail, structural members and handrail fixings and</li></ul>

					<p>the deck surface is an unresolved option of either concrete or york stone. Drawing 1701 Bridge Elevation B01 does indicate abutments and foundations but with no explanatory notes or detail.</p> <ul style="list-style-type: none"> <li>• Drawing P01 does not show any connections between the proposed bridge and existing and proposed paths.</li> </ul> <p>These details should be resolved before any grant of full planning permission.</p> <p>If there are any matters arising from this letter please contact me.</p> <p>Yours faithfully  Stephen Robson  S E Robson BSc BPhil MA(LM) DipEP CMLI MRTPI Chair, Conservation &amp; Planning Group</p>
Temple Grounds	North Yorkshire	E18/0230	II	<p>PLANNING APPLICATION Full Planning Permission for Conservatory Extension. 17 Hermitage Court, Richmond, North Yorkshire DL10 4GE.</p> <p>BUILDING ALTERATION</p>	<p><b>CGT WRITTEN RESPONSE 18.05.2018</b></p> <p>Thank you for your email to Dr Richard Lawson of 14th May 2018 concerning the application to erect a conservatory onto the east face of 17 Hermitage Court.</p> <p>I have assisted Dr Lawson and the late Mrs Lawson in the repair and conservation of Temple Grounds, and also acted as monitoring agent, for very many years. Temple Grounds, a site of national importance included on the Historic England Register of Parks and Gardens of Special Historic Interest, is the subject of a Heritage Landscape Management Plan under the direction of Natural England (formerly the Countryside Agency) National Heritage Unit. The Heritage Landscape Management Plan implementation began in 1995. Temple Grounds is also designated as being of outstanding scenic, scientific and historic interest and the National Heritage Unit works with the owner Dr Lawson, in helping him fulfil his duty to maintain the land and preserve its character. It is also a designated SINC (Site of Importance for Nature Conservation, North Yorkshire County Council).</p> <p>I would like to underline the comments from Dr Lawson on this planning application. 17 Hermitage Court is on the northern boundary of the Registered park and garden where changes can adversely affect the setting of Temple Grounds. When the Convent site was developed in c.2000, one of the conditions of the planning application was the prohibition of alterations to the facades of the buildings. This condition was introduced to try to minimise the effect the development would</p>

					<p>have on Temple Grounds and its setting so that the designed landscape's historic integrity could be conserved. Since the Temple Grounds Heritage Landscape Management Plan began implementation there have been numerous planning applications on the northern and eastern boundaries of Temple Grounds including of course the major development nearing completion at 'The Orchard'. The erection of a conservatory on the neighbouring property to No 17 several years ago, was not welcome in terms of the Management Plan and the setting of Temple Grounds but as the owner pleaded illness of their spouse as the reason for the application, and that the addition to the property would improve that person's quality of life, the application was approved.</p> <p>As Dr Lawson has said this current application is not in itself a major development and is likely to have little visual effect on Temple Grounds but it is yet another erosion of this special landscape's setting and views and therefore we do not approve of this application.</p> <p>I would just like to mention that the Gardens Trust (GT) formerly the Garden History Society, is the Statutory Consultee for parks and gardens and should be consulted by a Local Planning Authority on any planning application affecting a registered site. As far as I am aware there have not been any consultations regarding Temple Grounds.</p> <p>Yours sincerely Val Hepworth</p>
Thoresby Park	Nottinghamshire	E18/0161	I	PLANNING APPLICATION Relocate existing events car park to part cleared woodland north of the Thoresby Roundhouse. Thoresby Courtyard, Thoresby Park, Perlethorpe, Perlethorpe Cum Budby. PARKING	<p><b>TGT WRITTEN RESPONSE 23.05.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. We have liaised with our colleagues in the Nottinghamshire Gardens Trust and would be grateful if you could please take our comments into consideration when deciding this application.</p> <p>It is clear from the online documentation that the Thoresby Estate has given some serious thought as to how to alleviate the overall impact of cars on the immediate setting of the Courtyard and house. Dealing with cars is a very significant issue for parklands and is particularly acute for the 'Dukeries' of Sherwood which are quite poorly served by public</p>

transport. Thoresby is some distance from the urban centres of Worksop and Mansfield, and the estate itself is poorly connected to the established Sherwood cyclepath network which is well used. This leaves visitors little option but to arrive by car.

The relocation of parking away from the stable yard and into the Rookery will lessen the overall impact of cars on the immediate setting of the listed building. However, it is worth considering that if effort were made to improve vehicular access and facilities at other parts of the park as well, it would help dilute the intensity of car parking at the stable yard. The Planning Statement states that 200 spaces are needed and in response to HE's query as to whether alternative sites had been looked at, the reply was that other sites were too far from the Courtyard and/or too intrusive in the historic landscape. Concentrating all the new car parking facilities in one area will not spread the impact of car visits at all and will ultimately invite more car visits to an already very busy part of the site.

Thoresby Park estate is a Grade I registered parkland and really does deserve a comprehensive access and transport plan that focuses on alleviating the impact of visitor numbers. We would suggest that for instance, the estate village of Perlethorpe is within easy walking distance of the stable yard and could accommodate a new parking facility without any significant impact on the design landscape. Bridleways could be opened up to link to the network to the south and the Clumber Park network of paths to the north, encouraging people to visit by foot or cycle and reducing impacts of cars on the grade I registered parkland. At present bridleways literally stop dead at the Thoresby boundary, and not because of any physical hindrance. Visitors from Ollerton (the nearest large community) could quite easily walk or cycle the 3 miles to the stable yard facilities if there was a pleasant route through the parkland to use. We appreciate that this may not suit all visitors, but it would at least provide some alternative access routes. The NT, for example, has recently been proactively opening carefully sited new trails to encourage visitors to arrive by bicycle. Small car parks in carefully selected sites on the edges of the park would encourage those who merely want to walk their dogs for example, not to encroach on the core areas.

					<p>The absence of any examination of a strategic approach to the issue of visitor access is an issue. It is fair to criticise the present application for this omission and we would suggest that the local planning authority (under the requirements of the NPPF paragraph 129) carefully consider whether this proposal does enough to mitigate the impact of cars on the conservation of the registered parkland. Ultimately, any scheme that seeks to increase car parking provision within the registered parkland without a comprehensive consideration of alternative options has not considered the issue of sustainability that is a requirement of the NPPF paragraph 131.</p> <p>Yours sincerely,  Margie Hoffnung  Conservation Officer  The Gardens Trust</p>
The Deepdene (including Chart Park)	Surrey	E18/0170	II*	PLANNING APPLICATION Erect extensions to provide 5 No. new apartments at roof level. Kuoni House, Deepdene Avenue, Dorking, Surrey. BUILDING ALTERATION, RESIDENTIAL	<p><b>CGT WRITTEN RESPONSE 16.05.2018</b></p> <p>In terms of increased massing this is much less than the earlier proposals and I thought it acceptable from HP &amp; G point of view. However, I am unclear how far this application opens up the scope to pursue the previously identified conservation issues for the Register site and simply suggested that if possible they should be reconsidered.</p> <p>Best wishes  Don Josey</p>
Warwick Castle	Warwicks hire	E18/0227	I	PLANNING APPLICATION Retrospective application for the development of a Maze attraction, including a Viking ship and other themed structures, pathways, landscaping and associated infrastructure. Warwick Castle and Grounds, Castle Hill, Warwick. VISITOR ATTRACTION	<p><b>TGT WRITTEN RESPONSE 30.05.2018</b></p> <p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks &amp; Gardens, as per the above application. We have liaised with our colleagues in the Warwickshire Gardens Trust (WGT) and would like to submit these joint comments for the above retrospective application.</p> <p>Merlin Entertainments' planning applications for new visitor facilities at Warwick Castle appear with some regularity. They always stress their strong commitment to enhancing and preserving the designed heritage assets within their care, in this instance (Planning Design and Access Statement (PDAS): 'the proposal has sensitively considered the significance and setting of Warwick Castle and other heritage assets. The proposal is small in scale and well screened from important</p>

vantage points by dense vegetation.'

The HE entry for Warwick Castle states : "The principal historic interest of the Park and Gardens is in their association with 'Capability' Brown.... and also Robert Marnock and Harold Peto, who designed mid-19th and early-20th century gardens respectively. Together these layers of history which illustrate the improvements and tastes of the various owners ... contribute to the significance of the Grade I grounds." Robert Marnock's work at Warwick Castle was begun in the mid nineteenth century under the patronage of George and Anne Greville, the 4th Earl and Countess of Warwick. His significant work at Warwick was summarised by Paul Edwards in Country Life (February 16, 1984, pp. 420-424), and was described in the Gardener's Chronicle (Jan 1892) as a "charming and secluded rosery, also a piece of Marnock's work, and it is well worthy of him". The rose gardens, including their modern reincarnation (officially opened in 1986 by the late Diana, Princess of Wales), are specifically mentioned in the HE list entry. The GT suggests that to remove a designed heritage asset, mentioned in the listing entry, without applying for planning consent, shows a flagrant disregard rather than a commitment to conservation and we would not be examining this retrospective application had its removal not been brought to the attention of WDC by Dr Chris Hodgetts. Indeed, the destruction of the rose garden and its replacement with a maze is covered in just three paragraphs (2.7-2.9) within the PDAS, and the Rose Garden itself merits just two sentences (Para 2.9), whereas the justification for their removal and replacement with the Maze covers several pages. We would have liked to have seen an Options Appraisal suggesting what alternative sites were considered which might have avoided destroying completely an important part of Warwick Castle's heritage.

The GT has been in communication with Adam Busiakiewicz, an art historian and doctoral candidate at the University of Warwick, whose PhD thesis looks at the artistic achievements and patronage of Anne Greville (1829-1903), 4th Countess of Warwick. Mr Busiakiewicz's research into the significantly understudied Warwick Castle Archive (now owned by the Warwickshire County Record Office) has uncovered large amounts of correspondence between Marnock and the 4th Earl

					<p>that includes drawings and designs for this particular garden. The 4th Earl and Countess of Warwick's contribution to the Castle and its grounds were unquestionably undertaken with great attention to detail, and continued the highly sympathetic and thoughtful improvements made by successive owners since the seventeenth century, including Capability Brown's work there in the mid eighteenth century. By contrast, the new 'Horrible Histories Maze' is filled with new fast growing laurel hedges, themed displays and a Viking long boat. It is entirely out of keeping with the setting, despite being hidden by trees and hedges. Merlin Entertainment's installation of this attraction, without consulting the WDC, is indicative of their disregard for the designed heritage assets in their care as well as the correct planning protocols, in favour of commercial development.</p> <p>The RPG is a highly selective designation. Warwick is one of only 145 internationally important Grade I designed landscapes in England, from a total of 1658 designated parks and gardens. This puts Warwick on a par with places such as Stowe and Stourhead, so it is incumbent on Warwick DC to robustly uphold the NPPF which makes it very clear that harm to such heritage assets should be wholly exceptional and any adverse impact on key views and settings should be very strongly resisted. Indeed NPPF Para 132 states that "... great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. ... Substantial harm to or loss of designated heritage assets of the highest significance notably ... grade I ...registered parks and gardens ... should be wholly exceptional." We would also suggest that the obliteration of the rose garden is contrary to NPPF para 133, 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..."</p> <p>The GT/WGT OBJECT to this application and we would urge WDC to refuse this retrospective application.</p> <p>Yours sincerely,        Margie Hoffnung        Conservation Officer        The Gardens Trust</p>
St Ives Estate	West	E18/0138	II	PLANNING APPLICATION	<b>CGT WRITTEN RESPONSE 21.05.2018</b>

	Yorkshire			<p>Reserved matters application for 28 dwellings approved by outline permission 15/01039/MAO requesting consideration of the layout, scale, appearance and landscaping: RE-CONSULTATION - REVISED DRAWINGS &amp; SUPPORTING INFO. Land At Harden Road And Keighley Road, Harden, Bingley, West Yorkshire. RESIDENTIAL</p>	<p>Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee regarding the proposed development affecting St Ives Park, a public park included by Historic England (HE) on their Register of Parks &amp; Gardens. The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and YGT is responding on behalf of both Trusts regarding this application. We would be grateful if you could please take our comments into consideration when deciding this application.</p> <p>St Ives Estate is a nationally important designed landscape, which was in the ownership of the Ferrand family for nearly 300 years. Between 1858 and 1889 it was developed by William Busfeild Ferrand as a romantic wild landscape "imbued with a variety of historical and mythical associations linking the past with the present. Conscientious enhancement of a naturally dramatic landscape reflects the fashion of the time for nature as a powerful force. It manifests in physical form its association with the philosophy of an important C19 Tory radical, a close friend of Disraeli and a leading member of the young England movement".</p> <p>This proposed site for housing, which bounds St Ives Estate, currently makes a positive contribution to the estate's significance through its rural character and is an important part of its setting as seen from Harden Road and Keighley Road in Harden village. It is a prominent location and any development will particularly affect the setting of the western section of St Ives Estate which W B Farrand was still improving in 1886 and where he noted 'his plantations were very fine in 1888', the year before he died.</p> <p>The layout and house types in this planning application appear to have been imported as standard designs without any attempt to relate them to the local architecture and their proximity to a Registered park and garden. We also consider that the proposed development would have an adverse impact on the setting through its position and scale. Particularly the proposed designs of the 3 storey houses for plots 12-17, 20- 25, which are dominated by garage doors on the front elevation, would result in an urbanisation of this rural site.</p> <p>We therefore consider that the proposed development would harm the significance of the Registered landscape of St Ives Estate due to the proposed urbanisation of its rural setting, and object to this</p>
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					application. Yours sincerely, Val Hepworth Chairman
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Yours sincerely,  
Val Hepworth  
Chairman