

## **CONSERVATION CASEWORK LOG NOTES MARCH 2019**

The GT conservation team received 138 new cases in England and five cases in Wales during March, 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, 37 'No Comment' responses were lodged by the GT and 19 by CGTs in response to planning applications included in the weekly lists. The list also includes responses to some cases made by other like-minded organisations, with whom we keep in close contact.

SITE	COUNTY	GT REF	GRADE	PROPOSAL	WRITTEN RESPONSE
Frenchay Hospital	Avon	E18/1598	N	PLANNING APPLICATION Creation of new road and associated highway works. Roads 1 And 1 B, Former Frenchay Hospital, Frenchay Park Road, Frenchay, Bristol. ROAD	Thank you for consulting The Gardens Trust [GT], in its role as Statutory Consultee with regard to proposed development affecting a locally registered park and garden.  The Avon Gardens Trust is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.  The gazetteer entry describes the asset as follows:- 'Frenchay Conservation Area. C18 parkland now substantially built over by hospital: fine avenue and specimen trees; cedar, Wellingtonia, monkey-puzzle, holm oak; ha-ha; walled garden; entrance lodges. French Park House (LBII) mid C18, extended early C19; stableblock (LBII) mid C19. Major hospital and HQ of Frenchay Health Authority.' The Arboricultural Impact Assessment and Protection Plan submitted with the application states that four trees will require removal in order to accommodate the road, comprising two Category B tree and two Category C trees. It will also be necessary to carry out localised removal and hard

					pruning of trees within two further groups. A further three trees may require removal as a result of the works, all of which are Category A trees, and one of which is protected by a Tree Preservation Order.  The proposed development would be inappropriate in terms of its impact to existing trees and would conflict with the aims of Policy CS9 of the Core Strategy, which states 'ensure heritage assets are conserved, respected and enhanced in a manner appropriate to their significance' and Policy PSP17 of the Policies, Sites and Places Plan which states that 'Development proposals should serve to protect, and where appropriate, enhance or better reveal the significance of heritage assets and their settings.'  Consequently we object to the application, which would result in significant harm to the locally registered historic park and garden.  Summary: The Avon Gardens Trust objects to this proposal.  Yours sincerely Ros Delany (Dr)  Chairman, Avon Gardens Trust
Tyntesfield	Avon	E18/1746	*	PLANNING APPLICATION and Listed Building Consent Erection of metal fencing 1.75metre high as Deer fencing to enclose the Rose Garden. To include 1no. set of gates to the parapet wall to the south boundary of the garden and 2no. gates to the Deer fencing. Tyntesfield Rose Garden, Tyntesfield, Wraxall. BOUNDARY	CGT WRITTEN RESPONSE 21.03.2019  Summary: The Avon Gardens Trust has no objection to this proposal.  We are grateful for the opportunity to comment on this proposal. The proposed site for the fencing erection is within the registered Grade II*  Tyntesfield Estate, on Historic England's Register of Parks and Gardens of Special Historic Interest.  Having studied the application, the proposed works will protect the Rose Garden. Therefore we consider this proposal to cause less than significant harm to the registered garden.  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 planning applications in this context has now passed to Avon Gardens Trust.  Yours sincerely  Ros Delany (Dr)  Chairman, Avon Gardens Trust
Stoke Park	Avon	E18/1799	II	PLANNING APPLICATION Proposed restoration of an existing historic access route, and former carriage ride, with a self- binding gravel path surface. Stoke	CGT WRITTEN RESPONSE 26.03.2019  Thank you for consulting The Gardens Trust [GT], in its role as Statutory Consultee with regard to proposed development affecting a nationally registered park and garden.  The Avon Gardens Trust is a member organisation of the GT and works in

Wotton House	Buckingha mshire	E18/0110	1	PLANNING APPLICATION  PLANNING APPLICATION  Conversion of an existing barn to 1no. 3 bed dwelling. Grenville Cottage Barn, Ludgershall Road,	partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.  The site area is within the Stoke Park Registered Grade II, Historic Park and Garden. It is an C18 park laid out by Thomas Wright between 1748 and 1766, around a country house. The park is of considerable interest as the best documented and most complete surviving landscape design by Thomas Wright.  This application will support Policy BCS 22; Conservation and the Historic Environment, by restoring most of an historic carriage drive route along which are a number of designed viewpoints. Therefore we think that the up grading of existing paths will have a positive impact on the surrounding parkland. It will also be in keeping with the Stoke Park Conservation and Management Plan.  Summary: The Avon Gardens Trust supports this proposal.  Yours sincerely, Ros Delany (Dr)  Chairman, Avon Gardens Trust  TGT WRITTEN RESPONSE 31.03.2019  We are responding to the Appeal against the refusal of consent for conversion of an existing barn to create 1 x 3 bedroom residential dwelling as per 18/0016/REF above. Our comments are with specific reference to
				Wotton Underwood, Buckinghamshire HP18 ORU. CHANGE OF USE, BUILDING ALTERATION, RESIDENTIAL OUTCOME Refused APPEAL LODGED 07.03.2019	the 'Grounds For Appeal' (GFA) document prepared by Barker Parry in November 2018 and the 'Heritage Appeal Statement' (HAS) prepared by CGMS on October 2018. Historic England (HE), AVDC, the Gardens Trust (GT) and the Buckinghamshire Gardens Trust (BGT) all objected to both of the previous planning applications. The GT/BGT fully support the points made for the previous applications by the Heritage Officer for AVDC, that
				Appeal Ref APP/J0405/W/18/3216730 To be dealt with by way of the Written Representations	the application is in principle unacceptably damaging to the character and fabric of the designed landscape. It is not just the views of the building but the damage to the historic character of the designed landscape. The GT/BGT stands by the conclusions we drew in response to the two previous planning applications.
					The principle remains that conversion of this structure to residential use would substantially harm the design and character of the Grade I registered park which is of exceptional significance as defined by HE's register entry. This is not justified by the subjectivity of the applicant's presenting the proposals as 'improving' the aesthetic appearance of the

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				site and the structure. To present the proposal as improving the views
				between the site and the designed landscape is to misinterpret and
				misunderstand the character and significance of a C18 Arcadian landscape.
				Due to our fundamental opposition to the conversion of this agricultural
				building to residential use, we set out below the basis on which our
				objection both to the previous applications and to the Appeal is founded,
				and why we believe that this Appeal should not be permitted. We will
				respond to the various points made in the applications and Appeal
				documents, which attempt to justify the principals.
				In our letters of objection to the previous proposals for this site, the
				GT/BGT recommended that the applicant prepare a Heritage Impact
				Assessment and a Visual Impact Assessment. In the revised planning
				submission, they have addressed the impact of these proposals on a Grade
				I landscape in the HAS. The HAS states (5.24): 'The site is obscured from
				view by a cluster of trees and views from the site to Wotton House, and
				vice versa, are completely obscured. Where glimpsed views of the building
				are possible, the building is perceived as a degraded agricultural building
				which offers no historical value to the setting. It is considered that in its
				current form the building detracts from the historic value of the RPG,
				Conservation Area and the valued landscape.' Para 5.25 continues: 'The
				proposal would represent a change in use, character and appearance of
				the site, which forms a small part of the Wotton House Registered Park and
				Garden and the Wotton Underwood Conservation Area. However, this part
				of the heritage assets forms part of a discreet and distinct character area
				that already includes residential use and associated features. Furthermore,
				it is largely visually distinct from the wider parkland. It is the Appellants'
				opinion that the conversion would have a limited visual impact, not
				experienced from the majority of the Estate, and would have only a very
				limited change on the character of this immediate area and how this
				interacts with the wider Estate. The works would not diminish the ability to
				appreciate the wider design ideals, including the historic and artistic
				interest of the Wotton Estate and the current clear distinction between the
				land within the parkland and the peripheral land beyond, including the
				appeal site, which does not form a part of planned views and is not
				situated within the pasture land. '
				The impact is also covered in the GFA, Para 5.24, which describes the value
				and position of the barn : 'The site is obscured from view by a cluster of
				trees and views from the site to Wotton House, and vice versa, are
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completely obscured. Where glimpsed views of the building are possible, the building is perceived as a degraded agricultural building which offers no historical value to the setting. It is considered that in its current form the building detracts from the historic value of the RPG, Conservation Area and the valued landscape.'

This shows a lack of understanding of the significance of the designed landscape. Whilst views are highly significant and imposed interventions upon the landscape, there is more to a designed landscape than the direct views to and from the house. The fact that the trees now obscure some visibility to the specific site is irrelevant; the barn is clearly visible from many positions within the registered parkland (RPG) (see photo below). The fact that these buildings were part of the additional facilities intended to support the maintenance of the wider estate demonstrates that they are significant in this landscape. Whilst Grenville Cottage (formerly the Keeper's Lodge) always housed estate workers, the conversion of the barn is an inappropriate increase to the domesticity of this area. The barn sits adjacent to the boundary fence and is not tucked further back like Grenville Cottage and therefore will have a detrimental impact on the RPG. HE's advice is relevant here: 'Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number.' (p4)

The GFA statement also implies that the proposed conversion would be preferable to a degraded building which currently sits unobtrusively in the landscape. The GT/BGT disagree. In our opinion the existing building nestles into the woodland edge and evokes the agricultural heritage and Arcadian character of the designed landscape and adds to the borrowed views in the simple, functional way it sits in its setting. To convert this structure into residential use with an expanse of large new windows facing into the parkland will result in a contemporary structure that is clearly a modern conversion rather than a re-use or continuation of an existing agricultural building for its original function, subservient to the adjacent gamekeeper's cottage as a related service structure. If the structure is no longer in use and redundant and is itself of limited historic value, there is no heritage gain in converting it. The GT/BGT maintains that where

buildings are redundant from their previous use, the answer should not always be to seek a new use for them in residential form and we would recommend that alternative uses are sought for this structure which are nearer to its original use which would allow the retention of both the current structure in its original form and the character that it conveys. However, we note that in the Heritage Appeal Statement (point 2.3) the applicant's representatives contradict this previous statement saying that "it does form an integral part of the Estate and, together with Grenville Cottage, would have assisted in the running of the Estate since at least the nineteenth century." If the structure is now considered to be of historic use, then to convert it in the form being suggested would have a detrimental impact on the historic significance of the structure as well as the architectural hierarchy of the group of buildings and the wider character of the registered landscape.

The Summary of the HAS acknowledges (5.3) that 'The Appeal Scheme will change the appearance of the Appeal Site through the creation of a single, high-quality dwelling. This will help to preserve the nineteenth-century Barn, an integral and functional part of the Estate. Although this would introduce a more overtly domestic appearance, this will not change the character of the Appeal Site or its immediate surrounds. It will not affect the ability to appreciate or experience the historic character of the parkland or its high significance as an eighteenth-century planned landscape, designed by some of the most influential landscape designers of the century.'

Therefore the Appeal documents on one hand seek to confirm that the barn forms part of a group of buildings which were part of the wider estate and therefore a heritage asset, and yet at the same time the Appeal document suggests that there will be no impact from the domestic conversion of the barn just because it would be possible to distinguish between the 'planned' landscape and the wider site.

Para 4.3.4 of the Heritage Appeal Statement states "the potential changes to accommodate the change of use would not generally be noted from within the wider parkland. The proposals would utilise the historic existing access and parking from the northwest, which is shared with The Terrapin and Grenville Cottage, while any domestic paraphernalia, such as sheds could also be accommodated here. Therefore while the changes to the Barn itself, including the provision of additional glazing, would be evident from within the wider parkland, these associated changes to accommodate

the change of use would not and would remain obscured from the wider estate. As such, this presents no change from the existing use and appearance of this part of the RPG and Conservation Area." The GT/BGT note that this is a clear admission on the part of the applicant that there will be an increase in domestic paraphernalia resulting from the conversion of the barn. We suggest that once converted, there will be no way to control the extent or the position of this which has a clear potential impact on the RPG which could be avoided if this Appeal were to be rejected. Just because Grenville Cottage and The Terrapin are already domestic dwellings with the associated domestic paraphernalia does not mean it should be permitted to spread further. The photographs submitted in the HAS show only limited views of the barn and the views to and from the barn within the landscape. Plate 5 in particular appears to be taken from an angle which allows a large tree to minimise the visibility of the barn in the landscape. However, as the following photograph of the SE elevation (which will have the greatest amount of new glazing) shows, the barn and any future conversion would be extremely visible from within the RPG. There is more to a designed landscape than the direct views to and from the main house. The fact that the trees now obscure some visibility to the specific site is irrelevant; the site is clearly visible from many positions within the registered parkland. Further planting to mitigate the visibility impact within the designed landscape would not be appropriate solution as this would be a modern intervention in a registered landscape to conceal some other intrusion. In conclusion, the conversion of this building will fundamentally change its character and appearance in the landscape, will result in light emittence and reflection and will present as 'modern and tidy residential' which would not be appropriate in a Grade 1 landscape of exceptional historic significance. Finally, we believe that the application is contrary to several Paragraphs from the revised National Planning Policy Framework for the reasons given above, namely: Para 185a: 'the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation' 185c: 'the desirability of new development making a positive contribution to local character and distinctiveness' 185d: 'opportunities to draw on the contribution made by the historic

Stowe	Buckingha	E18/1614	1	PLANNING APPLICATION	TGT WRITTEN RESPONSE 06.03.2019
					Conservation Officer
					Margie Hoffnung
					Yours sincerely,
					b) We advise that this Appeal be rejected
					Registered site.
					residential use causes substantial harm to the character and fabric of the
					Arcadian character is paramount, and that the proposed conversion to
					landscape of this nationally significant designed landscape where an C18
					a) The site of this Appeal is of considerable significance within the
					In summary we consider
					Section 72 of the (Listed Buildings and Conservaiton Areas) Act 1990.
					District Local Plan, the effect upon the Wotton Conservation Area and
					reasons for refusal in relation to various policies within the Aylesbury Vale
					requirements of the revised NPPF. We concur with your own Authority's
					In our opinion this proposal does not comply with several of the
					was put in place. This application is in direct contravention of that aim.
					was sold to the Applicant, a Covenant prohibiting conversion to a dwelling
					our opinion mainly a private gain. We also understand that when the site
					Cottage and The Terrapin as well as Grenville Barn so it would appear in
					particularly as it has been stated that the Applicant already owns Grenville
					per Para 196 we do not believe that the public benefit outweighs the harm,
					very significant and, as the proposal is to create an additional dwelling, as
					As the asset is the Grade 1 registered Park and Garden, the asset is clearly
					conservation'
					medium term through appropriate marketing that will enable its
					195B: 'no viable use of the heritage asset itself can be found in the
					site'
					195a : 'the nature of the heritage asset prevents all reasonable uses of the
					setting), should require clear and convincing justification'
					asset (from its alteration or destruction, or from development within its
					194: 'Any harm to, or loss of, the significance of a designated heritage
					to local character and distinctiveness'
					192c : 'the desirability of new development making a positive contribution
					conservation'
					of heritage assets and putting them to viable uses consistent with their
					190 and 192a: 'the desirability of sustaining and enhancing the significance
					environment to the character of a place'

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mshire	Reserved matters application	Thank you for consulting The Gardens Trust (GT) in its role as Statutory
	persuant to outline planning	Consultee with regard to proposed development affecting a site included
	permission 17/01840/AOP	by Historic England (HE) on their Register of Parks & Gardens, as per the
	layout, scale, external	above application. We have liaised with our colleagues in the
	appearance, the access, and the	Buckinghamshire Gardens Trust (BGT) and would be grateful if you could
	landscaping of the site.	take our comments into consideration when deciding this application.
	Silverstone Motor Racing Circuit,	The applicant has provided a substantial number of documents to support
	Silverstone Road, Biddlesden,	the application but nothing that specifically addresses the impact on the
	Buckinghamshire NN12 8TN.	hugely important and significant Registered Park & Garden (RPG) at Stowe
	MISCELLANEOUS	which immediately abuts the application site. Given the scale of this
		project and the investment involved, we are disappointed that these have
		not been provided.
		Our main concern relates to the proposed new structures, especially in
		Zones K and M1/M2 which will potentially be visible from within the RPG
		and could potentially compromise the setting and views from the Great
		Riding (one of the key views at Stowe) along its entire length, including
		from the Wolfe Obelisk at the south end. This view has already been
		adversely affected by the poorly positioned Wing building at the northern
		extremity. We feel that planting a tree screen would not be appropriate
		here as the whole point is an uninterrupted long vista running unbroken
		into the horizon. The proposed new hotel is 5 storeys high and obviously
		will be lit up with internal lighting, and have external signage etc, so there
		is the chance it will be visible in the landscape when daylight is low. We
		have looked at the photo montages for this proposal and these indicate
		that it will not be visible from the ride, but obviously it does not show the
		structure illuminated at night when it might be visible through the existing
		tree screen. The GT/BGT do not have the capacity to review all the
		documents or to make their own assessment on site, so we hope very
		much that the proposed structure will not be visible from the RPG. We
		urge AVDC officers to ensure that this is the case before deciding this
		application. It is crucial that nothing compromises the northern vistas
		further. If the applicants do not have a document that proves this
		rigorously and reliably to everyone's satisfaction, this should be provided
		before any decision is made. Should your officers find that the northern
		vistas are further compromised in any way the GT/BGT would OBJECT to
		the application.
		It is clear from the online documentation that there are many other
		applications which have come through in relation to Stowe, as there are
11		approximate dama time dama

				various applications for Silverstone and/or adjacent privately owned properties which we have not been consulted on. Please can we remind you of your duty to send all such applications to the GT as statutory consultees?  Yours sincerely, Margie Hoffnung Conservation Officer
Stowe	Buckingha mshire	E18/1689	PLANNING APPLICATION Variation of Condition 1 - The building hereby permitted shall be removed and the land reinstated to its former condition on or before 31st May 2019 relating to 17/00861/APP. Condition to be extended for a further 3 years (new expiry of 31st May 2022). Stowe School, Stowe Park, Stowe, Buckinghamshire MK18 5EH. MISCELLANEOUS	TGT WRITTEN RESPONSE 06.03.2019 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 Buckinghamshire Gardens Trust (BGT) and would be grateful if you could take our comments into consideration when deciding this application. Looking back at the various planning applications for the portakabin/security gatehouse, it appears that this is the renewal of a 2017 application to replace an existing temporary building with another temporary building of similar style. The replacement 'temporary' building provided waste and water services, allowing the removal of the chemical toilet to the rear, thereby reducing the negative impact on the RPG. Whilst it was recognised that this was another temporary structure to be put in place whilst the applicant developed a permanent solution, the consent included a time limitation which is now about to expire.  However, we also note that there had been an application in 2016 (16/01728/APP) for a permanent security office with accompanying barrier and vehicular access. It would appear that this application had been supported in heritage terms but was withdrawn for some reason.  The GT/BGT does not object to this necessary proposal, but does question why a permanent solution has not yet been found. The 'temporary' structure has been in this position for so long that it has itself become fairly 'permanent'. Whilst the current security cabin is a lightweight structure which sits on an easily removable concrete pad, its temporary nature is not really fitting in an RPG when it has been in position for so long.  The GT/BGT would urge the school to resolve this matter to find a long term, appropriate solution and would be keen to comment on the various options for a permanent structure in any pre-app discussions. It is clear from the online documentation that there ar

Toft Hall	Cheshire	E18/1786	N	PLANNING APPLICATION CONVERSION OF VACANT STABLE BLOCK TO FORM THREE RESIDENTIAL UNITS, DEMOLITION OF EXISTING EXTENSION AND REPLACEMENT EXTENSION TOGETHER WITH ASSOCIATED WORKS. STABLE BLOCK, TOFT HALL, TOFT ROAD, TOFT, CHESHIRE WA16 9PD. BUILDING ALTERATION, CHANGE OF USE	not been consulted on. Please can we remind you of your duty to send all such applications to the GT as statutory consultees? Yours sincerely, Margie Hoffnung Conservation Officer  CGT WRITTEN RESPONSE 18.03.2019 Cheshire Gardens Trust (CGT) is grateful for the opportunity to comment on this application. CGT works with The Gardens Trust as the national statutory consultee. For further information see http://thegardenstrust.org/planning-leaflet.html and http://www.cheshire-gardens-trust.org.uk/?Aims We have no objection to the proposed conversion of the stable block to three residential units. However, we note that the stable block forms part of a collection of historic buildings within an important historic designed landscape where designer John Webb (1754–1828) was involved 1810 -1813. Features that Webb designed are recorded in estate documents held in
					John Rylands Special Collections and remain extant on site. These documents include a pencil plan of the stables (Toft Muniments 624), and an account book 1804 (Toft Muniments 727) records stones for the stable yard and expenditure for paving the stable yard, for levelling ground about the stables and planting 1812 (Toft Muniments 729 (1-5). There is likely to be further information about the stables in these records which we believe to be very relevant to this proposal.  The site is the subject of our ongoing research into the designed landscape and is proving of considerable interest. We therefore ask you to take into careful consideration any effects which these proposals may have on the historic designed landscape.
					If you have any further queries, please contact the writer. Susan Bartlett Planning & Conservation Coordinator Cheshire Gardens Trust
The Hoe	Devon	E18/1690	II	PLANNING APPLICATION Statue to commemorate Lady Nancy Astor. Grassed Area In Front Of Elliot Terrace, Plymouth. SCULPTURE/MONUMENT	CGT WRITTEN RESPONSE 04.03.2019  Thank you for consulting The Gardens Trust on the above application which affects The Hoe, an historic designed landscape of national interest which is included by Historic England on the Register of Parks and Gardens of Special Historic Interest at Grade II.  We are happy to support the proposals.

					Yours faithfully John Clark
C	D	540/4740	<b> </b>	DI ANNUNC APPLICATION	Conservation Officer CGT WRITTEN RESPONSE 25.03.2019
Castle Hill	Devon	E18/1740		PLANNING APPLICATION ERECTION OF 15 RESIDENTIAL DWELLING (INCLUSIVE OF FOUR AFFORDABLE DWELLINGS). LAND ADJACENT FILLEIGH VILLAGE HALL, FILLEIGH. RESIDENTIAL	Thank you for consulting The Gardens Trust on the above pre-application proposal which affects Castle Hill, an historic designed landscape of International importance included by Historic England on the Register of Parks and Gardens of Special Historic Interest at Grade I.  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. We have previously visited the site. We do not object to the proposed development. Yours faithfully John Clark Conservation Officer Devon Gardens Trust
Bicton	Devon	E18/1773		PLANNING APPLICATION Proposed siting of two floating holiday accommodation units, including the construction of associated floating jetties, log/recycling/refuse store, luggage trolley store and other associated works. Bicton College, East Budleigh, Budleigh Salterton EX9 7BY. HOLIDAY ACCOMMODATION	CGT WRITTEN RESPONSE 25.03.2019  Thank you for consulting the The Gardens Trust on the above application. Bicton is a site of national importance, as signified by its inclusion on the English Heritage Register of Parks and Gardens of special historic interest. This is a highly selective list, comprising just under 1600 sites. As a grade I site, Bicton is in the top 10% and is of international importance. The National Planning Policy Framework sets out that Registered parks and gardens are designated heritage assets of the highest significance.  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 to consultations on its behalf in the County of Devon. We have visited the site and have studied the application documents on your website. We would ask you to consider the following comments.  One of the core planning principles of the NPPF is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.  NPPF states that the more important the heritage asset the greater the weight that should be given to their conservation. NPPF states that assets of the highest significance, notably scheduled monuments, protected

					wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.'  NPPF also 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.' The proposed development cannot be considered to be a substantial public benefit.  The Gardens Trust considers that the proposal for the siting of two floating holiday accommodation units, including the construction of associated floating jetties, log/recycling/refuse store, luggage trolley store and other associated works would cause substantial harm to the significance of the the grade I Registered landscape. We urge your Council to refuse consent for this proposal as it clearly conflicts with national planning policy with regard to the conservation of the historic environment. Yours faithfully  John Clark  Conservation Officer  Devon Gardens Trust
Civic Centre, Plymouth	Devon	E18/1803	II	PLANNING APPLICATION Internal and external works to convert building, including part demolition, glazed extension, alterations to elevation including new cladding, public realm works and associated works. Civic Centre, Armada Way, Plymouth PL1 2AA. BUILDING ALTERATION	CGT WRITTEN RESPONSE 25.03.2019  Thank you for consulting The Gardens Trust on the above which affects The Civic Square which is 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.  We are happy to support the application.  Yours faithfully  John Clark  Conservation Officer
Riffhams	Essex	E18/1623	11	PLANNING APPLICATION Entrance gates with piers and wing-walls. Good Graces, Graces Lane, Little Baddow, Chelmsford, Essex CM3 4AX. ACCESS/GATES	CGT WRITTEN RESPONSES 06.03.2019  Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. The Essex Gardens Trust (EGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.

This response pertains to the proposal for the addition of entrance gates with piers and wing walls at the property Good Graces, Little Baddow. The site is located within the immediate setting of the Grade II Registered Park and Garden, Riffhams (HE Ref 1000239), accessed off Graces Lane to the west of the park. Riffhams Park and Garden is early nineteenth century, comprising of a Repton landscape laid out in 1815, and Cedar Park located to the north of Graces Lane. Graces Lane crosses the Park and Garden from east to west. separating Cedar Park from the formal gardens and parkland to the south. Graces Lane is characterised by its rural features; it is a narrow road, flanked by grass verges, hedgerows and the wooden fence boundary of Riffham's Park. The principal house of the park, Grade II listed Riffhams, is accessed from Graces Lane through a pair of stone gate piers fronting onto the lane. There is a second entrance to the west of this which leads to a courtyard. Both these entrances are simple in their design, with low wooden fencing painted white, leading to the capped stone piers at the main entrance. It is considered that the proposed entrance gates with piers and wing walls are out of character with the current rural setting of the Registered Park and Garden, predominantly due to their height and massing. The new wing walls and piers are 2.540 metres in height, grand in their design, and impermeable. Currently, Graces Lane is characterised by the rural landscape, and simple boundary treatment and entrances to the park. The proposed gates have the potential to impact our appreciation of these features of Riffham's Park, particularly when approached from the west. The proposed gates are more ornate, prominent, and taller than those it is replacing, and those which are in the park and its setting. As such, they

may contend with the entrance to Riffhams and features of the park. The rural landscape contributes to the character and setting of Riffham's Park and Garden. In rural areas, 'post and rail, simple park railings and hedges are the most common and appropriate' (Essex County Council, Conserve: Typical Details for Historic Buildings and Conservation Areas, 2010). Considering Paragraph 196 of the NPPF, the introduction of this entrance, more urban in character, may impact our understanding of the Registered Park and Garden. It is recommended that the height of the gate and piers be reduced to reflect the height of existing gates and piers within the park, and the connecting walls are constructed in a permeable material

similar to the wooden fencing within the park.

					Kind Regards,
					Essex Gardens Trust
Thorndon Hall	Essex	E18/1672	II*	PLANNING APPLICATION	CGT WRITTEN RESPONSE 16.03.2019
				Construction of single storey	Whether or not the proposed outbuilding within the garden can be built
				outbuilding. Green Keepers	under the terms of the GDPO, it would be large and represent a further
				Cottage, Thorndon Gate, Ingrave,	suburban intrusion into the registered landscape, as well as the Green Belt
				Essex CM13 3RQ.	and the Conservation Area. I would ask you to take this impact on the
				MAINTENANCE/STORAGE/OUTBU	heritage assets into consideration when determining this application. i.e.
				ILDING	pretty much as previous application.
					David Andrews
					Essex Gardens Trust
The Anvil, Great	Essex	E18/1733	N	PLANNING APPLICATION Outline	CGT WRITTEN RESPONSE 22.03.2019
Hallingbury				application with all matters	Thank you for consulting The Gardens Trust (GT) in its role as Statutory
				reserved except access for 1 no.	Consultee with regard to proposed development affecting a site listed by
				dwelling. The Anvil, Anvil Cross,	Historic England (HE) on their Register of Parks and Gardens as per the
				Church Road, Great Hallingbury.	above application. The Essex Gardens Trust (EGT) is a member organisation
				RESIDENTIAL	of the GT and works in partnership with it in respect of the protection and
					conservation of registered sites, and is authorised by the GT to respond on
					GT's behalf in respect of such consultations. This response pertains to the
					revised proposal for one detached dwelling, within the current garden at
					the property The Anvil, Anvil Cross Church Road Great Hallingbury Bishops
					Stortford CM22 7UB. The property is located within the parish of Great
					Hillingbury, notable for its rural character and ancient pattern of scattered settlement which has survived to the present day. The site is located within
					the western side of the former Hallingbury Park. Hallingbury Park (SMR
					Number 19517) is a significant eighteenth-century parkland, designed by
					Capability Brown with later alterations and additions by Repton and
					Wallace, with a surviving lake, earthworks and planting. The park boundary
					is still discernible in the modern landscape through substantial tree belt
					planting, the Ladywell Plantation, scattered tree clumps and the central
					lake. Built development surrounding the parkland is limited, the Victoria
					County History noting that 'Hallingbury Place, one of Essex's greatest
					houses, came to dominate the parish' and that 'the existence of the park
					may have restricted development in the centre of the parish, but by the
					later 18th century there had been a little building'. The park is currently set
					within a rural countryside landscape, with minimal modern development
					within its environs, the Great Hallingbury Conservation Area to its north,
					Hatfield Forest to its east, and arable fields to its north, west and south

(albeit severed partially from the parkland by the M11). Within the west of
the park, it is noted that two lanes inside Hallingbury Park were closed in
the nineteenth century as part of the park's 'improvement': this included
the lane from Hallingbury Hall to West Drive, which has now become a
footpath. A further footpath also crosses the park to the west of this. These
routes form part of the designed landscape, and now allow for the park to
be accessed by the public. The introduction of a modern dwelling on the
proposed site has the potential to affect the parkland character; the park is
currently still discernible in the landscape, and has retained a strong
boundary and planting to the west. It is considered that the rural setting to
the parkland contributes to the Brownian character of Hallingbury Park. In
line with Paragraph 189 of the NPPF, applicants are required to 'describe
the significance of any heritage assets affected, including any contribution
made by their setting. The level of detail should be proportionate to the
assets' importance and no more than is sufficient to understand the
potential impact of the proposal on their significance'. Paragraph 197
highlights the requirement for assessment of non-designated assets. The
current application does not consider the heritage significance of
Hallingbury Park, its setting, or the potential impact on the heritage asset
by the proposed development. There is potential for the proposed
development to impact the current character of the park, as modern
development is currently sparse and dispersed within the park and its
setting, allowing for
the predominant character in the west to be of open parkland and the
rural setting beyond. However, it is considered that the proposed dwelling
is sympathetic in its design, and it will have a minimal impact; the new
property is set within a generous plot, appropriate in its proposed height,
and its design largely in keeping with the rural character of the area. It is
also located such that it will be largely concealed from view from within
the park and surrounding tracks by existing buildings and outbuildings on
the site, existing planting that will be retained, and new screening planting.
While it is unlikely that the proposal will affect Hallingbury Park, it is
recommended that views from within the park are addressed, particularly
from the Public Rights of Way, to ensure that the proposed development
would not have a negative impact on fortuitous and intended kinetic views
from the paths across the parkland towards the countryside. It is also
considered that the sympathetic design of the elevation submitted is key in
assessing potential for impact to the heritage asset; if approved, it is

				recommended that the design is retained to ensure the house is sensitive to the rural character of the area.  Kind Regards, Essex Gardens Trust
Sherborne House	Glouceste rshire	E18/1683	PLANNING APPLICATION Full Application for Proposed single storey extension and new window at Bourton Lodge, Sherborne, Cheltenham, Gloucestershire GL54 3DS. BUILDING ALTERATION	TGT WRITTEN RESPONSE 21.03.2019 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 Gloucestershire Gardens & Landscape Trust and have a few additional comments to make to add to their response. We have studied the documentation online and are surprised to see that there appears to be absolutely no mention whatsoever that this property sits in the centre of the Grade II Sherborne registered parkland or indeed that Bourton Lodge itself is listed Grade II, as are the adjoining gate and gate piers. We suggest that before your officers are able to determine whether or not the proposed extension and alteration are appropriate, you ask the applicants to provide a far more detailed heritage and visual access statement which considers the effect that the proposed works may have on the surrounding RPG and its setting. We are glad to note that should this proposal be accepted, that the new works will be in matching materials to the existing building. Yours sincerely, Margie Hoffnung Conservation Officer  CGT WRITTEN RESPONSE 21.03.2019 Thank you for consulting The Garden Trust regarding this application for the extension to Bourton Lodge, adjacent to and integral with the Grade 11 registered park to Sherbourne House. The Garden Trust has further consulted the Gloucestershire Gardens and Landscape Trust (GGLT) to respond on its behalf. Regarding the current setting of the Lodge, any alterations and additions to the Lodge will have some visual impact on the wider parkland setting to Sherbourne, However, in the GGLT's opinion, the proposed addition of a new dining room extension will have a marginal impact on the massing to the Lodge in this setting. So long as the Council can ensure that the detailing and materials are

					precisely in accord with the existing structure; in spite of the rather mechanical computer generated renderings, the proposal should fit into the wider parkland setting.  Yours sincerely, David Ball, (on behalf of GGLT)
St Mary's, Painswick	Glouceste	E18/1696	II	PLANNING APPLICATION Construction of car port, garden pavilion, decking, privacy fencing, kitchen store, two garden sheds, glazing of pool pergola, pool cover and new stone wall to pool area. Court House, Hale Lane, Painswick, Stroud. HYBRID	CGT WRITTEN RESPONSE 21.03.2019  Thank you for consulting The Garden Trust regarding these proposals. The Garden Trust, as a Statutory Consultee, has asked The Gloucestershire Garden and Landscape Trust (GGLT) to respond on its behalf.  As a key Listed Building, Court House has been subject to a whole range of alterations and additions in the relatively recent past. Its siting in the heart of Painswick, adjacent to the churchyard, gives the setting of this building and its impact on the wider built environment considerable prominence. The fact that this application now seeks to regularise some of these changes is to be welcomed. GGLT would not wish to become involved with the very detailed aspects of the design solutions. However, the Trust would wish to ensure that design quality and consistency of craftsmanship in the use of traditional materials is achieved across the whole site in order to reestablish the quality and character of Court House.  Yours sincerely, David Ball, (on behalf of GGLT)
North London Waste Plan	Greater London	E15/0559	n/a	LOCAL PLAN Consultation on Draft North London Waste Plan	CGT WRITTEN RESPONSE 07.03.2019  I write as Secretary to the Planning & Conservation Working Group of the London Parks & Gardens Trust (LPGT). The LPGT is affiliated to The Gardens Trust (TGT, formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (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 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 www.londongardensonline.org.uk) and/or when included in the Greater London Historic Assets Register (HAR).  We have considered the information that you have provided and on the basis that the proposals prioritise the use of brownfield sites we do not wish to comment on the proposals.

					We would however emphasise that this does not in any way signify either our approval or disapproval of the proposals.  If you have any further queries, please contact us at this email address.  Yours faithfully  Helen Morris
Bexley Local Plan	Greater	E18/1624	n/a	LOCAL PLAN Consultation on preferred approaches to matters to be contained within the new Local Plan	Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee. The London Parks and Gardens Trust (LPGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations. Response to Regulation 18 stage consultation paper (February 2019) S97 Heritage assets The London Parks and Gardens Trust welcome recognition of value of Bexley's heritage assets (para 4.39 & SP7(1)). We would also look for a policy approach which values, protects and conserves the borough's wider heritage assets of designed landscapes such as public parks, grounds of historic houses, and sites, churchyards, cemeteries, London Squares and town squares. The current Local List does not include non designated heritage assets of designed landscapes and so these will not be taken into account when determining planning applications. Para 4.46 refers to "locally listed buildings reviews" but not to the inclusion of landscapes. Para 4.61 again focuses on buildings whereas The nominations procedure is correct. Criteria: designed landscape interest Description: locally important historic designed landscapes, parks and gardens that may relate to their design or social history.  http://www.bexley.gov.uk/sites/bexley-cms/files/2017-09/Local-List-NominationsProcedure.pdf  There are references to "Historic Environment Record" but this cannot be found on the Council's website. References to Danson Mansion should also specifically include its parkland which is also "listed" eg SP7(1a) insert "and park" after Danson Mansion.  London Parks & Gardens Trust's Inventory London Gardens Online is the London Parks & Gardens Trust's Inventory of public parks, gardens, squares, cemeteries, churchyards and other green spaces of local historic interest. Whereas the English Heritage Register of Parks and Gardens of Special Historic Interest is for designed landscapes that make a great contribution

and gardens of local heritage interest in Greater London. Sites on the LPGT Inventory have some element of formal layout or landscape design, or have important social history attached to it. It can be filtered by borough. We request the Borough urgently reviews the local list to ensure that valued designed landscapes are included to be protected by the revised local plan. http://www.londongardensonline.org.uk/ SP11 Green Infrastructure General support DP11 Building heights The London Parks and Gardens Trust believes the Council should ensure that significantly taller buildings do not have a damaging effect on the design nor on the experience of being within public green spaces. DP13 Development proposals affecting a heritage asset The London Parks and Gardens Trust (LPGT) request stronger protection be given to Bexley's few high quality heritage assets. LPGT object strongly to the omission of valued designed landscapes in particular the four sites on the register of historic parks and gardens: • Danson Park • Foots Cray Place • Hall Place and Gardens • Lamorbey Park DP13 (2)Insert "or landscapes" after locally listed buildings. DP13 should: • include detailed policies which apply not only to development within and adjacent but also which potentially impact on designed views into, as well as from, the landscape and setting, their landscape character and defined significance. Policy approach DP12, Protected views, only protects specific views. • The Change of use clause should also include criteria for considering temporary development and events and to ensure subsequent restoration. • require the submission of management and maintenance plans to ensure the ongoing protection of landscape character and defined significance. Developers should be required to refer to the GLHER and the LPGT inventory when drawing up proposals and justify their approach through a heritage impact assessment. DP26 Access to open space Policies should require developers to consider design, landscaping and provision of amenity space, etc in new

					development and how it will contribute to green landscapes of the future, for future residents. The London Parks and Gardens Trust believes it is important that new development that benefits from proximity to existing open space contributes to its ongoing upkeep and makes capital investment to ensure the park can cope with increased use.  DP27 Urban open space DP27 (2d) insert "landscape design".  The Proposals Map The Local Plan should contain a list and map of registered sites and other heritage assets.  Helen Monger, Director On behalf of the London Parks & Gardens Trust Planning and Conservation Group London Parks & Gardens Trust
Hertfordshire Minerals Local Plan	Hertfords hire	E18/1434	n/a	LOCAL PLAN PUBLICATION OF THE PROPOSED SUBMISSION MINERALS LOCAL PLAN & OMISSION SITES CONSULTATION	Please provide detailed comments explaining why you consider the plan is not legally compliant and/or unsound.  Preferred Area 1 - The Briggens Estate (Olives Farm). NPPF 205b requires that there are no unacceptable adverse impacts on the historic environment. HCC Policy 15 states that the historic environment will be protected, conserved and where appropriate enhanced. The area within the proposed boundary is an AAS with finds in local museums and the British Museum as well as the site of a WWII place crash. It abuts the recently scheduled monument of Hunsdon Fish Ponds which is the first recognized feature of the great Henry VIII park at Hunsdon, the majority of the area is the former 17th century park of Stanstead Bury and as such will contain the archaeology and other remains pertaining to these parks. The site is adjacent to 2 parks Registered by Historic England, one of which, Briggens has recently been added to the Heritage At Risk Register. A further undesignated historic landscape, at Bonningtons, lies on the northern boundary. There are over 50 Listed buildings as well Powered by Objective Online 4.2 - page 1 as undesignated ones of local importance within 100m of the boundary. All these heritage assets will be adversely affected. There will be serious harm to the settings of listed buildings, especially those at Olives Farm and to the Registered Parks. Setting is not just visual but how a heritage asset is experienced, i.e. noise, traffic, pollution are all factors. The archaeological evidence of the site will be totally destroyed.  The Site Selection for this site rated it Red on Heritage assets , although the scheduled monument is not included in the assessment, nor is the HAR designation for Briggens landscape. It is difficult to see why the SA does not

					accord it the same weight. This site has been proposed contrary to the NPPF and the HCC policies to protect, conserve and enhance and thus fails the soundness tests as above Question 4 Please give details of what change(s) you consider is(are) necessary to make the Minerals Local Plan 'sound' / legally and procedurally compliant, having regard to the test(s) of soundness you indicated in Part 4 above. You will need to state why your proposed change will make the document sound. Where appropriate, you should include your suggested wording of paragraph(s) or site brief(s). (Please be as precise as possible) Removal of the Briggens site from the Proposals, not only due to failing the national and local policies on heritage but failing to take into account the cumulative loss of heritage assets in this area with the Gilston development, destroying parts of Gilston Park , Hunsdon Old Park, Hunsdon New Park, Sayes park and Pisho (not Pishio at Sawbridgeworth) Park with other earlier archaeology as well as the medieval and Tudor park remains
169 Knightsfield, Welwyn Garden City	Hertfords hire	E18/1528	N	PLANNING APPLICATION Erection of a two-storey building 10 x dwellings and dance studio with underground parking space following demolition of existing building. 169 Knightsfield, Welwyn Garden City AL8 7QG. DEMOLITION, RESIDENTIAL	CGT WRITTEN RESPONSE 18.03.2019  Thank you for consulting the Gardens Trust, of which HGT is a member.  The revisions now contained in this planning application do not address the concerns we noted on our comments on 18/2/19. Our previous comments therefore stand and we are still concerned about the impact on this historic landscape.  Kate Harwood
27 Woodland Rise, Welwyn Garden City	Hertfords hire	E18/1675	N	PLANNING APPLICATION Fell 1 x Bay tree (T3). 27 Woodland Rise, Welwyn Garden City AL8 7LJ. TREES	CGT WRITTEN RESPONSE 05.03.2019  Thank you for consulting the Gardens trust, of which HGT is a member.  We are unclear as to why an application has been made to fell this tree as the form states it is not causing harm and is not in a dangerous condition.  As no reason has been advanced for this, we would be in favour of retaining the tree unless there is good reason given to fell it.  Kate Harwood
Goldings	Hertfords hire	E18/1739	II	PLANNING APPLICATION Restoration and conversion of a water tower to 2 No bedroom dwelling. Water Tower, Goldens Way, Hertford, Hertfordshire SG14 2WH. RESIDENTIAL,	CGT WRITTEN RESPONSE 18.03.2019  Thank you for consulting The Gardens Trust, of which Hertfordshire Gardens Trust is a member.  We have studied the plans for this application and are disappointed that there is no heritage impact assessment, either for the surrounding parkland, Registered at Grade II or the mansion, Listed at Grade II*.

			BUILDING ALTERATION	We would welcome assurance that the current tree planting around the water tower is to be retained and augmented if necessary to prevent harm to the Registered landscape and any views.  Kate Harwood  Conservation & Planning  Hertfordshire Gardens Trust
Thwaite Hall	Humbersi de	E18/1666	PLANNING APPLICATION Residential Development for 95 dwellings comprising the conversion of existing buildings into 34 flats and 27 town houses and erection of new buildings to provide 9 flats and 25 town houses following demolition of ancillary buildings. University Of Hull, Thwaite Hall, Thwaite Street, Cottingham, East Riding Of Yorkshire HU16 4RE. RESIDENTIAL, BUILDING ALTERATION	CGT WRITTEN RESPONSE 19.03.2019  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, at grade II 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.  Thwaite Hall (formerly Thwaite House) is important as a rare survival of an impressive 19th century villa garden in an urban setting at Cottingham, and is recognised as such by its inclusion on the Historic England Register of Historic Parks and Gardens (NHLE: 1000137). In the mid 20th century (c,1948), the hall was extended and the gardens developed as botanic and experimental gardens by the University of Hull.  John William Hentig, a Hull merchant, built Thwaite Hall in 1803-7 and by 1839 had created a garden. The ship owners David and Charles Wilson (later Lord Nunholmburne), whose wealth came from the expanding port of Hull, subsequently bought the estate and during 1870-80s developed the garden, pleasure grounds and small parkland. Cottingham was a favoured rural retreat, located away from the city of Hull, where the wealthy had space to build villas and lay out gardens. Albert Rollitt, a solicitor and Mayor of Hull, bought the estate and during his ownership, as President of the Hull Botanic Garden, the gardens were well maintained. He sold it on to Colonel Goddard, who by 1928 sold it to University College, now the University of Hull. They extended the house renaming it Thwaite Hall and established a botanic and experimental garden. This almost certainly resulted in its survival as many contemporary villas and gardens at Cottingham were built over in the 20th century. While most of these villas had relatively small gardens (1 to 2 acres), Thwaite House was considerably larger (31 acres), which gave more

the larger landscape gardens associated with more substantial properties that designers such as Humphry Repton was working on at the time. The second phase of landscaping during the 1870-80s, particularly the sinuous lake, shows influences from the more informal style as advocated by William Robinson later in the century. The 19th century villa garden was a sign of social status. It reflected the owner's taste and influences and this makes them unique. Few were designed by professionals, but influenced by garden design at the time and mostly consisted of a lawn and specimen trees. Occasionally they would have quirky buildings, winding paths and shrubbery to create the idea of a larger space. The sense of space, within the encroaching urban scene, is still an important aspect of the current garden layout. Today Thwaite Hall Gardens is an important green oasis in an increasing urban environment, as Cottingham is now enveloped within the suburbs of Hull. The gardens are a significant component of the Cottingham Conservation Area, which enhances its beauty and environmental quality. Its woodland and lake provide an important wild life habitat. Establishment of the botanic gardens added further interest to the setting, by introducing rare species of plants, shrubs and trees and those surviving are documented. Thwaite Hall Gardens is valued locally as evidenced by the Cottingham Civic Society having been a driving force in getting it listed (Grade II) on the Register of Parks and Gardens of Special Historic Interest. Under the tenure of the University of Hull it provided a valuable environment for students living in the halls of residence, those studying and advancing research in biological science and horticulture, also a stimulating environment for school teachers and children. Friends of Thwaite Gardens are an active group, who now help maintain the gardens – a valuable community asset. Thwaite Hall Gardens has a history of exotic planting and we understand that a member of the Friends has been working with the 'Tree Register Of Britain and Ireland' (TROBI) whose job it is to gather and collate records of all tree species grown in the British Isles. From this data they are able to ascertain the largest individual examples of any species in the UK. These are designated 'Champion' status - National Champions, or County Champions on the basis of height or girth or both. About 80 trees in the Thwaite collection were assessed by TROBI who considered no fewer than 37 to be "remarkable" in some way. Of these, 31 were confirmed to be Yorkshire Champions and 6 were National Champions. These have been checked by visits from TROBI officers. This list does not include many other

trees which, although not 'remarkable' are nevertheless highly admired like the Redwoods and Foxglove Tree. Chief recorder for TROBI - Dr. Owen Johnson (author of Collins Tree Guide) described the Thwaite collection as "After Thorp Perrow, it's perhaps the most interesting collection of mature rare trees in N.E. England". The whole of the application site (apart from Southlands) is within the boundary of the Registered park and garden which includes the hall and all the other non-designated buildings. The GT and YGT welcomes the retention and re-use of Thwaite Hall and its later sympathetic extensions. However, we have serious concerns regarding the impact of the proposed new buildings and the associated hard landscaping and car parking on the registered park and garden and the Cottingham Conservation Area. We consider that the proposal is over-development of this historic site. In addition, we consider that the application does not adequately address the National Planning Policy Framework, NPPF February 2019. The application site is also not allocated for residential purposes in the Cottingham Neighbourhood Plan and Design Guide. Notwithstanding this we consider that there may be the potential for some new development on the site without causing harm to the heritage assets affected but this should not detract from the open character and ornamental nature of the site and the qualities of the Conservation Area. The reduction of the amount of new development would have the added benefit of reducing the need for harmful areas of parking and hard landscaping and allow more of the green character of the registered gardens to be retained and enhanced. We note in the Design and Access Statement on the Landscaping that 'It is intended to comprehensively landscape the whole site, renovate the existing gardens and provide a long-term management regime for the whole.' However, we have read the Landscape Strategy and Maintenance Statement and the Heritage Impact Assessment and have serious reservations about their objectives and proposals: Heritage Impact Assessment p34 states that 'New tree planting to be native species with selected fruit and nut bearing trees to support wildlife'. And, 'The planting design has been developed to respond to the site context and the overall selection of plants favours native species.' Whilst the GT and YGT consider this to be a commendable aim we consider that due to Thwaite's history and design, that any new tree planting priority should not be native species but also include ornamental species as the original design intention and continued during the ownership of the University of Hull. Many non-native ornamental trees and shrubs give valuable food and excellent wildlife habitat. Landscape Strategy and Maintenance Statement '1.2 Objective The landscape strategy for the proposed residential development at Thwaite Hall has been developed to respond to the unique and varying context of the overall site and the collective landscape elements that exist within the site. There are two main distinctive sections to the site: the southern curtilage of the hall where the extent of new residential development will be contained and the listed garden to the northern margin. The approach to the landscape strategy will require a sensitive landscape design response that considers the various landscape elements of the site with a clear understanding of their significance from an ecological and historical perspective. The right level of landscape design intervention is required, developed in collaboration with the project Ecologist and Arboriculturalist to devise a comprehensive and appropriate landscape enhancement planting strategy. The challenge and objective of the landscape proposal is to reconcile and mitigate the transitional areas between new development and existing landscape, with particular focus on the loss of existing trees and any likely disruption to existing habitats, whilst setting out a clear strategy for replacement planting that will support and enhance biodiversity.' We also note sections 3.1 The overall objectives for the maintenance and management of the existing and new landscape elements of Thwaite Hall is to conserve and appropriately manage the existing features of the listed garden, retaining ecological interest whilst ensuring wildlife habitats are protected; for new landscape elements, a comprehensive maintenance and management routine is equally important, to promote the establishment of new planting species that will contribute positively to the diversity of wildlife habitats on site. And 3.7 'Element: New Shrub & Ornamental Planting Objective: The primary objectives for the proposed ornamental planting areas is to enhance the external appearance of the built environment by 'softening' the hard landscape edges of development, define the boundaries of public & private spaces and also introduce pollinator plants within the development.' It seems that the documents fail to properly recognise the botanical and arboricultural value of Thwaite Hall Gardens and we consider that such a

landscape strategy although helpful is not adequate for a registered historic park and garden. The registered area covers the whole site and includes the southern area the curtilage of the hall and additional buildings. It was designed as an entity with the house, and later incorporated the University buildings and Botanic Gardens. The proposed strategy does not underpin the designed historic nature of the site and although it is important to have collaboration with an ecologist and arboriculturist, a historic park and garden expert familiar with such a site is fundamental to understanding the heritage asset and how it can be taken forward. We advise that this could be achieved in the form of a formally adopted Conservation Management Plan (CMP), produced by a heritage professional familiar with this type of historic garden. The CMP should be developed in conjunction with expertise from Historic England (HE) and the Friends of Thwaite Gardens and the University of Hull. Such a document would give substantial enhancement to the site over a period of years and should encompass paths and their surfaces, ornamental and wildlife planting, seating, management of the lake, as well as road and car parking surfaces etc. Thwaite Hall Park and Garden appears on HE 'Heritage at Risk Register' with a trend of its condition having significant localised problems, high vulnerability and with a trend of declining. A CMP would contribute to Thwaite Hall's removal from the 'Heritage at Risk Register', significantly enhance the environment for residents and importantly also ensure that any heritage harm will be outweighed by public benefits (NPPF para 184,196). In conclusion we have serious concerns regarding this application on heritage grounds. We do not consider that the application as submitted meets the requirements of NPPF paragraphs 184, 193, 194, 196 and 197. We also note the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas and section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. Thwaite Hall and its historic designed landscape is a rare survival of a large 19th century villa garden in a built-up area much appreciated by the local community. Yours sincerely

				Val Hepworth Chairman cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust
Gisburne Park	Lancashire	E18/0773	PLANNING APPLICATION Reinstatement works to stabilise and retain existing building. Erection of a temporary marquee to the rear for up to 28 days per year for use as a wedding venue. Dog Kennels by River Ribble Approximately 90 metres North East of Gisburn Bridge, Gisburn Park, Gisburn BB7 4HX. MARQUEE, MISCELLANEOUS	CGT WRITTEN RESPONSE 12.03.2019  Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. The Lancashire Gardens Trust (LGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.  We responded initially to this application by letter of objection dated 23 September 2018. In this we explained briefly the importance of Gisburne Park and the significance of the designed landscape of which the Dog Kennels are an integral part. We also highlighted the rarity of such structures both in their survival and original occurrence.  Further information has been provided by the applicant in the form of an internal Historic England memo dated 22 April 2015. It is noted that this memo recommends taking down of decayed parts of the structure, and storage of salvaged stone to enable a phased approach to the repairs. The memo does not give any indication of a permanent reduction of the structure. The Method Statement submitted in the original application remains unchanged, with no indication of any intentions to rebuild dismantled elements of the structure. This will amount to the partial demolition of the Kennels. Our objection stands.  LGT's support for refurbishment of the building remains, as well as raising its profile by establishment of a temporary marquee for wedding use. However no further details have been provided to indicate how much of the Dog Kennels building will actually remain following the stabilising works. At worst, it is possible that more than half of the upper structure will have to be taken down and lost. This is not acceptable.  No further details have been provided in relation to the marquee, and its access and servicing. We previously asked about capacity of the existing car park, details o

				application means that LGT's objection still stands.  If there are any matters arising from this letter please contact me  Yours faithfully  Stephen Robson S E Robson BSc BPhil MA(LM) DipEP CMLI MRTPI  Chair, Conservation & Planning Group
Ashton Gardens	Lancashire	E18/1588	PLANNING APPLICATION REPLACING EXISTING WOOD SHED WITH WOODEN PAVILLION. ASHTON GARDENS BOWLING GREEN CLUB GREEN 2, ST GEORGES ROAD, LYTHAM ST. SPORT/LEISURE	CGT WRITTEN RESPONSE 11.03.2019  Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. The Lancashire Gardens Trust (LGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.  The current application lies within the Grade II Registered Park and Garden (RPG) at Ashton Gardens, in a very prominent position which can be seen from much of the site. We have a number of concerns about this application, and whilst LGT could support the principle of replacement and/or relocation of the present timber structures, we object to the application as it currently stands, for the following reasons.  We note that a revised drawing 2019/FY/WH/PL/005 has only recently been uploaded to the planning application website. This shows the roof pitch of the proposed pavilion at 15°. Such a roof structure would be out of context in its historic setting. A roof pitch of at least 30° would be characteristic of structures dating from the time of the design of this landscape in the early twentieth century. Although the existing retained shed is a shallow monopitch, the visual impact of this would not be significant in comparison to the considerably larger proposed new pavilion.  We also have concerns about a lack of detail of the treatment of the change of level, which appears to be intended as a blockwork retaining wall. This is out of keeping with the quality of the very sensitive early 20th Century design of this site. Suitable materials and details for copings etc are required. In addition, 'pavings' are indicated on Drawing 003 where presumably new surfacing is intended. There is no description given and these proposals appear not fully thought through. As a Grade II RPG, this site requires

					For the above reasons, we therefore recommend that this application is refused as it stands. Further details, and the use of appropriate materials are required. If there are any matters arising from this letter please contact me  Yours faithfully Stephen Robson S E Robson BSc BPhil MA(LM) DipEP CMLI MRTPI Chair, Conservation & Planning Group
St Helens Local Plan	Mersey side	E18/1474	n/a	LOCAL PLAN St.Helens Borough Local Plan 2020-2035 Submission Draft consultation	Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to the above emerging planning policy. The Lancashire Gardens Trust (LGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered historic designed landscapes, and is authorised by the GT to respond on GT's behalf in respect of such consultations. Our comments refer in the main to Policy LPC11 Historic Environment: LGT supports the comprehensive approach to protection and policies as set out under Historic Environment. Paragraph 1 In particular LGT welcomes the inclusion and specific reference to 'non-designated above ground assets' in paragraph 1 of LPC11. Paragraph 5 The reference to local lists is welcomed and we would suggest that the word 'and sites' should be added to the text in addition to 'buildings'. Although there may not at present be a local list for historic designed landscapes, it is hoped that in time this may be addressed. Clause 7.21.7 Registered Parks and Gardens There are actually three RPGs in St Helens Borough. The recently (2013) listed RPG at the 'Landscape Associated with the Former Pilkington Headquarters Complex' requires to be named in addition to the two sites already identified. We note however, that this RPG appears to be correctly indicated on the Policies Map South Plan. Clause 7.21.10 Non-designated buildings and other structures Again, although there may not at present be a local list for historic designed landscapes, it is hoped that in time this may be addressed. We suggest that the title is extended to cover 'and sites', to be consistent with LPC11/6.  Policies Map North Plan Borough Cemetery, Windleshaw is shown as RPG but the north boundary is indicating a slightly smaller area of listing than the actual boundary currently indicated on HE website. This needs correcting.  We trust that these comments will be taken as constructive and will be

					accommodated into the final adopted Local Plan policies.  If there are any matters arising from this letter please contact me  Yours faithfully Stephen Robson S E Robson BSc BPhil MA(LM) DipEP CMLI MRTPI Chair, Conservation & Planning Group
High Road, Gorleston	Norfolk	E18/1761	N	PLANNING APPLICATION Construction of one single storey detached dwelling and creation of access to High Road. High Road, Gorleston, GREAT YARMOUTH NR31 OPB. RESIDENTIAL	TGT WRITTEN RESPONSE 14.03.2019  Thank you very much for contacting the Gardens Trust about the proposed development on the former gardens of your house. The Gardens Trust is only a statutory consultee for registered parks and gardens. I am afraid that much as I would like to follow up this application, as the garden is unlisted, we just do not have the capacity to respond. I cover the whole of England part time and struggle to keep up with applications as it is. I have forwarded it to the Georgian Group who may well have picked it up anyway. I am sure that they will be able to advise you on this.  With best wishes for a favourable outcome.  Margie Hoffnung  Conservation Officer  The Gardens Trust
Studley Royal	North Yorkshire	E18/1692		PLANNING APPLICATION Removal of 40m of hedgerow. Low Lindrick Farm, Studley Royal, Ripon, North Yorkshire HG4 3BD. MISCELLANEOUS	CGT WRITTEN RESPONSE 18.03.2019  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, at grade I 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. Studley Royal and Fountains Abbey was designated as a World Heritage Site (WHS) in 1986 due to its world importance, combining the ruins of a monastic site with an early water garden and designed ornamental pleasure grounds. The site has been described as 'one of the most spectacular scenic compositions in England' (Hussey, 1967) and the 'finest formal water-garden in the country' (Jellicoe et al 1986). Due to its World Heritage Site importance Studley Royal has a Buffer Zone required by UNESCO and the proposed works lay within this Zone. This Zone is an indicator of the sensitive nature of the wider landscape around the WHS. The application is to install a 400mm HPPE new water main via open cut trench methods and for plant/vehicle access works from B6265 through

			Yours sincerely Val Hepworth
			addressed.
			substantial harm to Studley Royal but ask that our comments above are
			but not its entirety. We do not consider that the works constitute
I			Zone is noted as being representative of a part of the setting of the WHS
I			Royal; with interventions within the adopted WHS Buffer Zone. The Buffer
I			register their concerns. The impacts will be within the setting of Studley
			also understand that the works may include tree- felling.  In conclusion the Gardens Trust and the Yorkshire Gardens Trust wishes to
			be undertaken in the nesting season from 1st March to 31st August. We
			In nature conservation and ecological terms removal of hedge should not
			There is also the archaeological dimension which needs to be addressed.
			be careful reinstatement where damage has occurred.
			steps taken not to damage the land during access/works and there should
			Farm qualifies as the setting of a heritage asset. There will also need to be
			Practice Advice Note 3, 2017. We consider that the area around Lindrick
			the park and note Historic England's, 'The Setting of Heritage Assets', Good
			There is the possibility that some of the sections may be visible from within
			use purposes.
			landscape, managed with reference to that but substantially for other land
			landscape' – agricultural land experienced as part of a wider designed
			long time. They are likely to be part of what Sarah Spooner calls 'estate
			boundaries - the land has been in the Mallorie/Aislabie ownership for a
			with the same species. The hedge-lines are probably long- established field
			preserve and any hedge removed must be replaced in the same way and
			The integrity of the field system is significant and it is important to
			We have the following comments:
			information regarding reinstatement which is also concerning.
			is not possible to determine its impact and we have not found any
			2019 (NPPF), paragraph 189. We have concerns about this application as it
			strategy as required by the National Planning Policy Framework February
			read and we note that there is not a heritage statement or archaeological
			We have found the documents accompanying this application difficult to
			Low Lindrick Farm to Birky Nab reservoir off Mill Bank.

	mshire			Reserved Matters Application Seeking Approval for Appearance, Landscaping, Layout and Scale for Erection of Phase I, Comprising 50,005sqm of Employment and Distribution Floorspace (Use Class B1, B2 and B8) Internal Access Road, Footpath and Cycle Routes, Drainage Works, Associated Car and HGV Parking, Associated Warehousing Plant and Infrastructure - Following Outline Application 18/00737/OUT. Land Off The A57 Worksop Bypass, Manton, Worksop. MISCELLANEOUS	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 Nottinghamshire Gardens Trust and would be grateful if you could take our comments into consideration when deciding this application. We note that the application has not been accompanied by a dedicated heritage impact assessment and that the Design and Access Statement does not contain anything but a passing reference to the registered parkland of Clumber.  The proposal site is north of Clumber Park and separated from the grade I registered parkland (RPG) by a substantial woodland plantation (made up of Forest Farm and Coach Road plantations). The proposed building is very large and it is clearly going to be a considerable presence within the local landscape. Despite it being on higher ground than Clumber Park, it is unlikely at present to create an impact on the experience of the Clumber RPG or on its significance due to the 'buffering' effect of the plantation. However, at some point this plantation may well be felled and if this occurs, the building is likely to become very apparent and impact negatively on the setting of the parkland. We would recommend that the local authority make provision to ensure that the plantation buffer is managed to ensure that the proposed building never becomes visible from Clumber Road.  We would also recommend that the your officers review the likely extent of impact arising from external light sources on site at night time and consider carefully the potential for impact on the parkland from 'light pollution'. Yours sincerely, Margie Hoffnung Conservation Officer
Ston Easton Park	Somerset	E17/1702	II	PLANNING APPLICATION Proposed works to a golf club including new academy Course, new driving range, two new golf holes to North-West, three New Golf Holes to South, Front 5 holes converted to 9 hole course, new Spa and Accommodation, new	Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to the amended plans regarding proposed development at Ston Easton golf course. We have liaised with our colleagues in the Somerset Gardens Trust (SGT) and would be grateful if you could take our comments into consideration when deciding this application.  Since our original response of 6th May 2018 the applicant has

				touring caravan park and amenities, conversion of existing driving range to accommodation and proposed car park extension. Farrington Golf Club, Marsh Lane, Ston Easton, Wells BS39 6TS. GOLF, CAMPING	commissioned a new Heritage Impact Assessment (HIA). It clearly sets out the impact of the proposed development within the RPG and its setting and provides the clarity and academic rigour missing from the original documentation. Kim Auston's detailed study into Repton's involvement at Ston Easton shows conclusively that the South Park is the area of greatest significance and sensitivity and that the proposed development within the North Park will not have the detrimental impact which we had been previously concerned about. The GT/SGT are also happy to see very sensible proposals for mitigation and restoration outlined in the HIA (Section 8). These encompass replanting of significant trees, management and restoration of the original field boundaries with successional trees etc, removal of scrub, regrading of previously excavated material, and the treatment of areas not within the golf course as managed hay meadows. We are also encouraged to note that the proposals include the commissioning of a management plan.  The GT/SGT are happy to SUPPORT these revised proposals. Yours sincerely, Margie Hoffnung Conservation Officer
Sheffield General Cemetery	South Yorkshire	E18/1178	*	PLANNING APPLICATION Demolition of garage/office buildings and erection of 22 apartments in 4/5 storey block including semi-basement/part ground floor car parking and ancillary accommodation. Cemetery Road Car Sales, 300 Cemetery Road, Sheffield S11 8FT. DEMOLITION, CEMETERY, RESIDENTIAL	CGT WRITTEN RESPONSE 11.03.2019  Thank you for consulting The Gardens Trust (GT) on the Updated Heritage Statement for this planning 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.  As noted in our letter of 6th December 2018, this planning application affects an outstanding example of a Victorian cemetery, recently awarded £3m Heritage Lottery Funding in order to restore it. The cemetery's national importance is signified by its being registered at grade II* (a high grade for a cemetery) on the Historic England Register of Historic Parks and Gardens.  We refer you to the contents of our letter of 6th December.  This planning proposal to replace a one-story garage and car repair shop with a four/five story apartment bloc will overpower the most historic parts of the site. It will reduce the realisation of the registered historic landscape and its listed buildings, which will now be hidden behind the new building. Instead of an improvement to the heritage; this development will not only remove/damage significant features of the registered historic

landscape in the walls, the archaeology, and the planting (trees) within the cemetery grounds, it will also change its character (and that of the wider area). The proposed development will be very close to Montague House and due to its massing, height and the fact that Cemetery Road falls away to the east, will overpower Montague House, which is the former Cemetery Office (listed grade II), in similar Graeco – Egyptian style to the principal entrance from Cemetery Road. Montague House is the highest part of the General Cemetery, directly overlooking the terraces and aligned on the Chapel (grade II\*). We do not agree with the Updated Heritage Statement's Non-Technical Summary that the impact will be minor. It will not be minor. We agree with the Statement that '...The proposals have the potential to impact the significance of the Sheffield General Cemetery (grade II\* registered park and garden and conservation area), the Nether Edge Conservation Area, Montague House, the former cemetery office (listed grade II), and the Old Chapel in the General Cemetery (listed grade II\*).

We have looked at the site sections and underline that although the proposal appears to be of a similar height to the residential properties opposite it will be of a huge mass rather than residential houses with varied roof lines. Regarding the rear elevation of the proposed block we query how the green/living wall on a north/northwest elevation will survive and how it will be maintained in the future. Although we consider that the garage site and the setting to Sheffield General Cemetery in this area could be beneficially improved by changes to the site, as outlined in our letter of 6th December and our points above, we remain of the opinion that the proposed 4/5 storey block is completely inappropriate in this location.

As you will be aware the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that, when considering whether to grant planning permission for development which affects a listed building or its setting (ie. the Registered Park and Garden), the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Section 66(1)).

In our view this planning proposal does not comply with NPPF (February 2019), paragraphs 190,192,193 and 194.

Sheffield General Cemetery is a significant part of our cultural and social history. Its landscape setting is an important part of how the whole Porter

Wentworth Castle	South Yorkshire	E18/1695		PLANNING APPLICATION Construction of Visitor Reception Building including provision of access ramp, removal of 4 trees and associated fencing and landscaping. Wentworth Castle Gardens, Lowe Lane, Stainborough, Barnsley S75 3ET. VISITOR FACILITIES	River Valley was envisaged; an open and treed landscape in which buildings were set. The cemetery is one of the remnants of this vision that is recognised by its registering, and should not be damaged, particularly in the light of the large sums of public money which will be used for its restoration.  In conclusion the Gardens Trust and the Yorkshire Gardens Trust wishes to register their strong objection to this application and asks the Council to refuse planning permission and seek a more sympathetic solution. Yours sincerely Val Hepworth Chairman cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust  CGT WRITTEN RESPONSE 01.03.2019  Thank you for your e-mail yesterday letting us know that the National Trust have clarified the circulation of visitors and confirmed that visitors will exit back out of the front doors, not through the higher level as previously. The NT is leasing St James Courtyard so no staff or students from Northern College will be using the exit from the glass partition into the courtyard now.  St. James' Courtyard is of course the churchyard designed as the family and staff's entrance to the (south side) of the church from Wentworth Castle and is the setting of the listed building. Recent use (since 2007) by the college's students, many of whom are short term residents is from the other side of the church. Consequently, unless the National Trust is planning to block up the link block windows, anyone using the Church for Community use or the Northern College bar at night (presuming it's still provided for students) will be entering from the stable yard (north) side into the top of the Long Barn and will be able to see straight through to the unedifying bin store ahead. If this is the case then we consider that it would not be sympathetic to these important heritage assets or the good work that the National Trust is focussed upon.  We hope that the outcome of our concerns will result in a more sympathetic solution.  Yours sincerely, Val Hepworth Chairman
Hampton Court	Surrey	E18/1384	I	PLANNING APPLICATION	cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust  TGT WRITTEN RESPONSE 11.02.2019

		1	approach, pathway network and	Trust (SGT) on the above proposed development. Our interest is its effect
Suss	sex		of a new Visitor Centre, entrance	
Highdown Wes	= = = = = = = = = = = = = = = = = = = =	II*		
•		11*		scheduled ancient monument and the Conservation Area. It is hard to think of many sites of such national and international importance.  The proposed development area lies directly opposite the Palace and its RPG as well as being immediately adjacent to Lutyens' 1930-3 bridge (Grade II). The river setting and Tudor approach of the Palace has until now survived remarkably unchanged but if this development were to go ahead, this would be irretrievably altered and lost to future generations. The D&A (p24) explaining the reason behind the naming of Cigarette Island after a houseboat of that name and a collection of other boats moored there in the C19, states "These temporary dwellings came to be generally regarded as an eyesore, not least because they were thought to detract from the setting of the palace and the Thames." If temporary houseboats were considered an 'eyesore' which detracted from the setting of the Palace and the Thames, this permanent and irreversible proposal is far worse, constituting an ill-judged, permanent intervention which would destroy totally the integral views between the approach from the station to Hampton Court Palace. No amount of planting or design mitigation can mitigate this. The Garden History Society (now the Gardens Trust) objected strongly to a previous application in 2008 and our views today are no different.  The GT considers that this proposal is contrary to the NPPF paras 190, 192(b) & (c), 193, 194 (b) & 195 and that this scheme detracts completely from the setting of Hampton Court Palace and its RPG. We would urge your officers to reject this insensitive scheme.  Yours sincerely, Margie Hoffnung Conservation Officer  CGT WRITTEN RESPONSE 22.03.2019  Thank you for consulting both the Gardens Trust and the Sussex Gardens  Trust (SGT) on the above proposed development. Our interest is its effect
			some existing buildings and structures on site including Hampton Court Motors. Jolly	of many sites of such national and international importance. The proposed development area lies directly opposite the Palace and its RPG as well as being immediately adjacent to Lutyens' 1930-3 bridge

extension of glasshouse in	on Highdown's designed historic landscape as the Garden is included on
addition to minor alterations to	the Historic England Register of Parks and Gardens with a grade II*
staff compound. Highdown	designation.
Gardens, Highdown Rise, Goring-	Two SGT Council members, including myself, visited Highdown on 13
_	- ,
By-Sea, Worthing BN12. HYBRID	December 2018 and met with the garden manager and head gardener. The
	views SGT expresses in this letter are based on the documents submitted
	with the application, the site visit and information from discussion with the 2 members of staff.
	SGT is content with the principles of the scheme and the opportunity it will
	create for extending and improving public access and of revitalising the
	garden overall, including the plant collection. However, we are
	disappointed that the application includes no Heritage Statement. The
	Design and Access statement states only that "[Highdown] is home to a
	National Collection of rare chalk-adapted plants based around the work of
	Sir Frederick Stern (1884-1967), the eminent gardener, plant collector and
	horticultural writer of the early 20th Century" and makes no further
	reference to it being a significant Edwardian garden, especially in relation
	to the materials used in, and the functions of, the various historic
	structures, the historic views and vistas which connect or divide the
	different character areas of the garden or the design thinking behind the
	disposition of the tree and shrub collection.
	Of particular concern are the raised beds in the Sensory Garden, currently
	shown as timber constructions (drawing no 8991/P/12/Rev A). Although
	the associated house dates from the early—mid C19, until the early C20 its
	garden comprised only 2 small lawns, one on each side of the house (Stern,
	'A Chalk Garden'); the majority of the detailed features – the 'cave' framed
	by a high wall of Horsham stone, the Horsham stone rockery and the Look-
	out, all date from the Stern era and were designed and built in the
	Edwardian tradition. We therefore consider it more appropriate for
	proposed refurbishment to reflect and reinforce that tradition with the
	appropriate construction materials typical of the period – and of this site –
	namely brick and stone.
	While there may be a place for timber sleepers elsewhere in the garden we
	, , ,
	consider that this main axial feature, which the Rose and Sensory gardens
	occupy, and which are the visual culmination of the approach along the
	main east/west axial path, should be constructed, as the circular bed is
	proposed and to reflect the adjacent look-out, in reclaimed bricks. It is,
	after all, pretty much the only formal feature in an otherwise informal

					layout. Brick can contribute an equally tactile, textural quality to timber, a desirable requirement for a sensory garden.  We suggest that the applicants prepare a Heritage Statement, with advice from a consultant experienced in historic garden design of the period, which should demonstrate an appropriate depth of understanding of the historic significance and design aspects of Highdown's garden, including those mentioned in paragraph three above, which may then be used to inform the refurbishment of both soft and hard landscape.  Yours faithfully  Virginia Hinze BSc. Dip. LD., Dipl. AA Cons (Historic landscapes, Parks and Gardens)  On behalf of the Sussex Gardens Trust  CC: The Gardens Trust
Castle Chain	West	E18/1674	N	PLANNING APPLICATION Single	CGT WRITTEN RESPONSE 18.03.2019
House, Pontefract	Yorkshire			storey extension to rear. Castle	Thank you for consulting The Gardens Trust (GT) regarding this application.
				Chain House, Castle Chain,	The Gardens Trust has liaised with the Yorkshire Gardens Trust (YGT) and
				Pontefract. BUILDING	YGT is responding on behalf of both Trusts.
				ALTERATION	We note the advice from Historic England and have no further comments
					to make.
					Yours sincerely
					Val Hepworth
					Chairman
					cc. Neil Redfern, Historic England; Margie Hoffnung, the Gardens Trust