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Research - Conserve - Campaign

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**Ref : 18/01062/NF3 - Construction of 3 all-weather hard tennis courts, with flood lighting on the former grass courts; Heigham Park, Recreation Road Norwich**

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. The Gardens Trust very much appreciates the withdrawal of the previous application 17/00485/NF3 and the commissioning of a Heritage Impact Assessment to look in greater detail at the points we raised in our original response dated 11<sup>th</sup> April 2017 as well altering the lighting. Please be assured that we sympathise with the difficult financial balancing act your Council faces, but we would urge you to again listen to our comments set out below before you make your final decision.

The Heritage Impact Assessment is thorough and it is clear from the conclusions reached that the author agrees with our assessment that the proposed hard courts would without doubt affect the significance of this RPG (5.35 – *"The impact (of the new hard courts) is significantly negative on the design and evidential value of the tennis courts and slightly negative on the design and evidential value of the park"* and 5.49 – *"The overall impact on the designed asset, the Park, is high on the less than substantial side."*). We must therefore see whether a solution can be found which satisfies your Council's need to provide sustainable and affordable tennis facilities without substantially destroying this valuable, nationally important heritage asset.

As it stands the proposed three new hard courts are sited across and blocking the main vista to the Pavilion, even though the Pavilion is less obscured than in the previous application. We are unable to support an application with this basic design flaw which impacts so negatively upon the significance and understanding of the original design intent of Sandys-Winch. We would suggest that contrary to HIA para 5.10, Sandys-Winch was not just recognised locally, but in fact had national recognition (GT response 11.4.17: *"The Institute of Landscape Architects awarded him a special fellowship (apparently one of only 30 at the time), in recognition of his achievements in laying out the Norwich Parks..."*).

Since the HIA was written, as you will no doubt be aware, a new National Planning Policy Framework has come into effect. In particular we would draw your attention to paragraph 194 which states : *"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of : (a) ... grade II registered parks or gardens should be exceptional."* The GT feels also that the new proposals do not

comply with Para 195a & b : *"the nature of the heritage asset prevents all reasonable uses of the site; and (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation..."* This is supported by the costed and carefully reasoned Business Case submitted by the Heigham Park Grass Tennis Group dated 12<sup>th</sup> July 2018. We would urge Norwich City Council to consider this very seriously. It would remove any costs for the running and maintenance of the courts from yourselves, saving you the £40,000 you mentioned in the Planning Statement (PS) as being the current annual expenditure on the courts. Their solution also has the benefit of having the pavilion within the securely fenced area, protecting it from vandalism. The GT would argue that Simon Meek's comment (PS 1<sup>st</sup> para, page 2) *"The introduction of new facilities is an opportunity to start to put the heart back into a number of Norwich's Parks"* has only become necessary in Heigham Park because the council itself forcibly closed the grass courts in September 2017. We therefore take issue with the term 'disused' and 'former grass tennis courts' (HIA 2.1). The PS makes clear that there is a huge demand for tennis facilities within Norwich. We would argue that 23 hard courts within one mile of Heigham Park, a further 18 within 2 miles and a total of 46 hard courts within the city of Norwich (yet no other grass courts), certainly strengthens the case for the retention of this historic heritage facility as there does seem to be considerable alternative hard court provision nearby. We would accept that for most tennis court operators, year round and evening play is a major factor within their business model, but in this instance, there is an operator ready and willing to take on the courts as they stand. We would urge your officers to please give this particular heritage site a reprieve, and allow the Heigham Park Grass Tennis Group say five years to prove that they can maintain and keep this heritage asset for the city. The money you save during this period, plus any additional funds from the Lawn Tennis Association or other bodies can be used to provide additional hard courts in less sensitive locations which the City Council could put forward, and everyone would benefit.

Yours sincerely,

Margie Hoffnung  
Conservation Officer