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This Planning and Conservation Advice Note (PCAN) is one of a series published by The Gardens Trust's predecessor, the Garden History Society in 2005.

The PCANs predate the National Planning Policy Framework. Any references to the planning system and planning policy (and particularly Section 8 'Planning Context' and Appendix 3) in the PCANs has been superseded and the conservation advice must be read in the context of the current National Planning Policy Framework published by the Government.

Government department names have changed since the PCAN series was published.

More information on The Gardens Trust's role in the planning system, casework, and our conservation publications and resource hub is available at:

<https://thegardenstrust.org/conservation/>

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1.0 Introduction

- 1.1 Historic designed landscape includes a wide range of types and styles from all periods; choice depending largely on the fashions of the times and the resources which were available when a landscape was laid out. But design and layout was also intimately associated with the use to which a landscape was to be put and the people who were to use it.
- 1.2 Some spaces, such as public parks, town walks and ornamental cemeteries were intended primarily for public use. The design of others, such as town squares, was originally focused on provision of an ornamental and recreational space for a much smaller group of citizens, usually those residing in surrounding houses. The ornamental grounds of asylums, hospitals, colleges and schools were also essentially designed for use by a selected group.
- 1.3 Private landscapes, however, were designed to exclude the majority of the population and to give an owner the privacy, security and, in many instances, the exclusivity which was desired. Such grounds varied widely in size; ranging from the villa garden, whose boundaries could be measured in yards, to the country house landscape park of many hundred acres.
- 1.4 Illumination of public grounds was initially employed as an added attraction, rather than as a necessity, usually in those grounds run on a commercial basis (e.g. in the early public pleasure gardens), since it could extend the period of use and thus increase the revenue. Similar motives often prompted lighting provision in later public parks, particularly those with specific areas to be hired for events, although the use of some public parks as thoroughfares resulted in paths and walks being lit increasingly through the nineteenth century (early inspiration being given by the gas illumination of Pall Mall, London in 1805).
- 1.5 At the outset, social customs usually protected all types of grounds (public, communal and private) to some extent from undesirable intrusion, but additional security measures were in evidence from an early period. Following the tradition of the country house landscape, public parks, ornamental cemeteries and many institutional grounds of the nineteenth century were provided with entrance lodges with resident gatekeeper or grounds superintendent, and the town walks of these and preceding decades were frequently gated and patrolled. Fences, hedges, railings and walls, interspersed with gates, clearly defined external boundaries, and the internal features and areas of public or communal grounds could be further protected from incursion by low railings, path edgings or simple and discreet signage.
- 1.6 These measures were largely, although not always wholly, effective in maintaining security and public order within such spaces until around the mid twentieth century, when the removal of vast quantities of ironwork for the war effort resulted in immediate loss of internal and external boundaries, signage and lighting. The ensuing open access to all areas, combined with reduction in local authority resources and loss of dedicated grounds staff, has led in many places to a downward spiral of outstanding repairs, vandalism and loss of public confidence in use.
- 1.7 The mid twentieth century was also a turning point for private grounds, with a progressive rise in personal mobility leading to an ever greater access to countryside areas and historic estates. Increased accessibility and alteration in social and economic circumstances has resulted in the change of use of many such landscapes (to leisure, hotels, multiple residential occupancy etc.) with corresponding changes in security and safety needs.

2.0 Information needed to evaluate proposals for Lighting and CCTV

- 2.1 Establish the extent of potential visibility of proposed structures for lighting and/or CCTV, if necessary by setting up a Red Flag Test.
It will be helpful to plot potential arcs of view on to a map of the site (for CCTV this is likely to be represented by arcs of coverage).
- 2.2 With the help of the English Heritage *Register* entry for the site, or of any district inventory* entry for sites not on the *Register*, establish the design intention and significance (see 1.1 to 1.5 above) of the features and areas from which the proposed facilities would be visible.

*Where a site is unregistered but designated of local or regional historic significance, local inventories (as produced by local authorities, county gardens trusts or other interested organisations) may provide a similar

level of information to the English Heritage *Register of Parks and Gardens of Special Historic Interest*. Further information may be contained in listed building and conservation area descriptions.

N.B. While the *Register* is a reliable guide, and local inventory entries may provide useful information, these should not be viewed as comprehensive descriptions, and the potential for additional structures and areas of importance to be identified should be recognised. A historic landscape assessment should be used as a supplement if the English Heritage *Register* entry or local inventory entry and listed building or conservation area descriptions do not give a clear explanation of relevant features and areas and insufficient information is presented with an application.

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

- 2.3 In addition to the location, size and form of proposed structures for lighting or CCTV, information should be available on any necessary subsidiary development (e.g. monitoring centres & signage*), and any below ground and/or above ground (e.g. cabling) works required.

*Constantly monitored CCTV systems with staff available for rapid response may fulfil security requirements BUT, where CCTV is intended primarily as a deterrent, additional signage is usually required.

- 2.4 A supporting or justification statement should accompany any application. This should explain the rationale behind the proposed provision, possible historical precedent* (for lighting) and any alternatives which have been considered.

For public landscapes, this may include survey of patterns of public use, results of public consultation etc. (see also 4.8 below).

*Where no historical precedent can be established, see *GHS PCAN 12: Evaluation of New Landscape Features*

3.0 Additional information required (Lighting and CCTV)

- 3.1 Detailed site specific research may be needed to determine the style and type of structure which may be appropriate (e.g. by examination of historical precedent).

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

- 3.2 In assessing the potential impact of proposals on historic landscape, the potential for repair also needs to be taken into account.

(Where a historic landscape has been unmanaged or inappropriately managed for some time, the significance of a particular area may not be immediately apparent e.g. where these are overgrown or where new structures have been sited, or areas hard surfaced. Evaluators need to ensure that development will not compromise future repair of important historic landscape areas and features e.g. the reopening of a vista through woodland; replanting of an avenue; reinstatement of a circuit walk with associated features etc.)

For example, a block of conifer planting may mitigate against adverse visual impact of structures but, if such planting is not part of design intention, it may be desirable in any future repair of the landscape to remove it (e.g. to open up a designed view). In such a case, the existence of high vertical structures could therefore compromise potential for future repair of the historic landscape.

Any evaluation of change on historic landscape should therefore include assessment of:

1. Existing damage (e.g. areas of tarmac for vehicle parking; modern buildings, structures, access ways, planting etc. which were not designed to preserve or enhance the character or appearance of a historic landscape) and its potential reversibility
2. Decay (e.g. lost features, lost or overgrown planting) and potential for its repair

A full historic landscape assessment can be an invaluable aid to understanding the provenance and significance of structures, features and areas of a historic landscape. A Conservation Management Plan, based on a Historic Landscape Assessment will confirm such potential for repair in cases of doubt.

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

GHS PCAN 14: Management Plans

4.0 Potential for Mitigation

- 4.1 Alternative security measures may be considered rather than comprehensive CCTV coverage or extensive lighting provision (e.g. increased staffing levels in key areas, restriction of access to outlying areas and along boundaries, changes in maintenance and management regimes to address the downward spiral of delayed repair/ vandalism/ loss of public confidence etc.).

In public parks, a 'safe route through' with high levels of lighting and security coverage (e.g. CCTV or staff patrol) may provide an acceptable solution to increase public confidence in use.

- 4.2 CCTV combined with other facilities (e.g. discreet signage posts or existing lighting columns) or sited on buildings and structures may be less intrusive than independent columns.
N.B. The potential impact on these would need to be evaluated individually and any requirement for listed building consent met.
- 4.3 CCTV & lighting columns sited against a backdrop may merge more effectively with surroundings if appropriate colours and materials are used.
- 4.4 A greater number of low to mid height columns (CCTV and/or lighting) may be less visually intrusive in a landscape than a lesser number at high level.
Similarly, lighting units at a low level may prove less intrusive than high columns (e.g. in vehicle parks).
- 4.5 Retractable columns may be considered for areas which require intermittent (e.g. events grounds) or seasonal (e.g. sports grounds) illumination or security coverage.
- 4.6 Where light levels are an issue, timed or movement-activated lighting may be considered.
- 4.7 Examination of the development history of a landscape may establish historical precedent for renewal of elements such as lighting, or repair of planting etc. which could limit visual intrusion (see 2.2 & 3.2 above).
- 4.8 Assessment of the essential nature of CCTV or lighting provision, should establish whether threats to security or personal safety are real or perceived (the supporting /justification statement should inform). Alternative measures to inspire public confidence may be appropriate.
If the necessary information is not immediately available , temporary consent (e.g. for CCTV) might be considered as an interim measure to determine levels of security required.

5.0 Watchpoints

- 5.1 The advice of a landscape professional should be sought on any below ground works in the vicinity of mature trees (such works near mature avenues of trees may require consultation with a historic avenue specialist).
- 5.2 The advice of a landscape professional should be sought on possible effect of lighting levels in the vicinity of mature trees (e.g. re ‘permanent day’ effect of constant light), particularly where these are close planted or in avenues).
- 5.3 Views across historic landscape can change markedly in different seasons. Seasonal variation should also be evaluated where units are proposed against a backdrop which comprises or includes deciduous planting.
- 5.4 Where landscape planting is immature, assessment of required CCTV coverage should consider full height and spread of planting in maturity, if future extension of CCTV coverage, or restriction in growth of planting are to be avoided.
N.B. Works to trees may not require consent or consultation with a local authority.
- 5.5 For any new or replacement systems/units consider design excellence.
- 5.6 Alien structures, such as CCTV cameras on poles, are likely to be more intrusive if viewed within formal and regular features (such as avenues) than within informal planting (e.g. wooded areas of mixed height trees).
- 5.7 Imposition of an alien structure, or parts of it, on the periphery of a focused view (e.g. along an avenue or between ornamental buildings or block planting) can immediately draw the eye away from that designed view (conflict of visual priority).
Similarly, such a structure, if sited within a vista, a viewpoint, landscape composition or panorama is likely to present as an ‘exclamation point’; drawing the eye and conflicting with design intention.
- 5.8 The potential impact of overtly modern structures is likely to be greater on areas and views of historic landscape where no such imposition has occurred to date.
- 5.9 The more areas of a landscape from which the facility is visible the greater will be the cumulative effect.

6.0 Unavoidable Damage

- 6.1 If provision of lighting and/or CCTV would result in significant adverse impact, but there are no possible alternatives which would result in a lesser impact, and personal or public safety would be seriously jeopardised if such facilities were not provided, every attempt should be made to mitigate against such impact, and corresponding gain for the affected historic landscape should be secured as part of the application.
This may include funding towards a comprehensive conservation management plan or, if such a plan is already in place, funding for specific repair projects, planting etc.

7.0 Application of Advice

- 7.1 If an application for lighting and/or CCTV, would result in significant adverse impact on a historic landscape, and potential for mitigation of such impact has not been identified or cannot be secured as part of any consent which the authority may be minded to grant, the Society would anticipate that the authority would refuse consent to the application.
- 7.2 If an application for lighting and/or CCTV, would not result in significant adverse impact on a historic landscape, or if appropriate mitigation of any potential adverse impact can and will be secured as part of any consent which the authority may be minded to grant, the Society would be unlikely to object to such an application and would not anticipate consultation.
- 7.3 Should there be doubt over the extent of impact on the historic landscape of an application for lighting and/or CCTV, we advise that a request be made via our London office* for the Society's regional conservation officer to discuss the case with the local authority.

*Such request should be made by telephone to the Society's Conservation Casework Manager on 020 7608 2409.

8.0 Planning Context

This section highlights some parts of government Planning Policy Guidance notes (general guidance on specific topics), which may be particularly relevant to applications for change on historic landscape. Further information may be accessed via the planning website (see 8.6 below)

PPG15: Planning & the Historic Environment

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

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

N.B. It is important to recognise the difference between setting of a listed building, which may comprise historic landscape, and the setting of the landscape itself, the evaluation of which involves a range of different issues

(See *GHS PCAN 11: Development in the Setting of Historic Designed Landscape*).

PPG16: Archaeology and Planning

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

- 8.2 **B18: Planning applications** 'The desirability of preserving an ancient monument and its setting is a material consideration in determining planning applications whether the monument is scheduled or unscheduled' '... Where local planning authorities are aware of a real and specific threat to a known archaeological site as a result of the potential exercise of permitted development rights (as set out in Schedule 2 of the Town and Country Planning Act General Development Order 1988) they may wish to consider the use of their powers under Article 4 of that order (see also 8.6 below) to withdraw those rights and to require specific planning permission to be obtained before development can proceed'.

PPG17: Planning for Open Space, Sport & Recreation

- 8.3 **Para 17: Developments within Open Space** 'Local authorities should (i) avoid any erosion of recreational function and maintain or enhance the character of open spaces...'
- 8.4 **Para 31: Sports and Recreation requiring Natural Features and Water** '...the visual amenity, heritage and nature conservation value of water resources should also be protected'.
- 8.5 **Annex: Definitions**
- 2: 'The following typology illustrates the broad range of open space that may be of public value...
- i. parks and gardens — including urban parks, country parks and formal gardens
 - v. amenity green space ... including ... domestic gardens
 - vii. allotments, community gardens ...
 - viii. cemeteries and churchyards'

Planning Website

- 8.6 The **website** of the Office of the Deputy Prime Minister www.odpm.gov.uk may be accessed for full information on the above PPGs and other relevant planning guidance e.g. PPG13: Transport: Planning and Access for Disabled People: A Good Practice Guide

Permitted Development Rights

8.7 Local planning authorities may consider the serving of an Article 4 Direction to withdraw permitted development rights and to require specific planning permission to be obtained before development can proceed in a number of other situations (see 8.2 above).

See also Appendix 3 for further parts of
PPG15: Planning and the Historic Environment
PPG16: Archaeology and Planning
PPG17: Planning for Open Space, Sport & Recreation
AND Planning in Wales

9.0 Evaluation of Impact

For proposal sites which fall within the setting of Historic Landscape, see GHS PCAN 11: Development in the Setting of Historic Landscape

Q1 Do the proposed facilities have historical precedence in this landscape in the positions proposed

If Yes Go to Q1A

If No Go to Q2

Q1A Does the form of the proposed facilities either follow historical precedence
OR meet standards of design excellence

If Yes Go to Q1B

If No, **redesign may be required** Go to Q2

Q1B Have major changes been made to landscape *design* since historical precedence (as Q1) was established

If Yes Go to Q2

If No, **adverse visual impact unlikely** Go To Q6

Q2 Has the historical significance of all areas from which the proposed facilities would be visible been adequately explained

If Yes Go to Q3

If No, **Historic Landscape Assessment required before proceeding with evaluation**

Q3 Will Columns/Units be visible/potentially visible from significant** areas of historic landscape

If Yes Go to Q4

If No, what prevents them being visible

a. too far away no visual impact, Go to Q6

b. lie of the land no visual impact, Go to Q6

c. planting intervenes

Is such planting deciduous or evergreen If deciduous treat as visible. Go to Q4

If planting is evergreen, is there potential within this application for condition for maintenance of such planting in perpetuity

If No, treat as visible. Go to Q4

If Yes, **condition may be required** Go to Q5

d. existing buildings intervene

Are such structures temporary or permanent

If temporary treat as visible. Go to Q4

If permanent treat as not visible. Go to Q6

(** significant areas will vary from landscape to landscape but may include the following:

Intricately designed and detailed areas and features (e.g. formal gardens, arboreta, airing courts [in asylum landscapes], canals, lakes and avenues) and designed setting for **ornamented structures** (e.g. chapels [in ornamental cemeteries], lodges, temples and glasshouses)

Vistas, viewpoints, compositions (e.g. designed views of a temple across a lake with backdrop woodland, or a lodge with ornamental garden apron and entrance splay) **and panoramas** (e.g. wide views of sweeping parkland from a ride or knoll)
High points in the landscape and designed circuit walks and drives

Q4 Is such view appropriate to the character (see e.g. 1.2 & 1.3 above) of this particular landscape
(e.g. lighting may be an appropriate addition in a public park)

If Yes, Go to Q4A

If No, Go to Q5

Q4A Does the form of the proposed facilities meet standards of design excellence

If Yes, Go to Q6

If No, **redesign may be required**, Go to Q5

Q5 Is there potential within this application/ proposal for mitigation of adverse visual impact (See Section 4.0 above and consider future requirements for replacement of planting which mitigates against adverse visual impact)

If Yes, **amendments** +/-or **condition required**, Go to Q6

If No, **potential adverse visual impact high**, Go to Q6

Q6 Will subsidiary development be required (e.g. See 2.3 above)

If Yes, Answer Qs 1–5 above for all aspects of subsidiary development. Go to Q7

If No, Go to Q7

Q7 Will any works in the vicinity of mature trees be required, including below ground works
(See 5.1 and 5.2 above, and include possible future works — see 5.4 above)

If Yes, **advice of landscape professional required**, **Assessment complete**

If No, **Assessment complete**

