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system and planning policy (and particularly Section 8 'Planning Context' and Appendix 3) in the PCANs has been superseded and the conservation advice must be read in the context of the current National Planning Policy Framework published by the Government.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

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THE GARDEN
HISTORY SOCIETY

Planning Conservation Advice Note

Appendices



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The Planning Conservation Advice Notes (PCANs) listed below have been devised by the Garden History Society to advise those wishing to determine the impact upon historic designed landscape of specific proposals for change. This includes local planning authorities, potential developers, owners or other interested parties. These PCANs seek to inform on necessary background information and good conservation practice while at the same time encouraging critical evaluation of the likely type and extent of potential impact. Not all impact is adverse, change is not necessarily detrimental, and opportunities do exist both for development and, where adverse impact has been identified, for appropriate mitigation. Informed evaluation is essential however, if irreversible damage is to be avoided and change is to be implemented in a way that is sympathetic to the historic and visual value of designed landscape.

Titles List

PCAN 1: Change of Use (of landscape, and of principal and/or subsidiary buildings)

PCAN 2: Hotel and Leisure Development

PCAN 3: Extension of Educational/Institutional Establishments

PCAN 4: Executive Housing

PCAN 5: Golf

PCAN 6: Vehicle Parking and Access

PCAN 7: Treatment of Boundaries and Entrances

PCAN 8: Telecommunications Masts

PCAN 9: Development of Domestic Amenities

PCAN 10: CCTV and Lighting

PCAN 11: Development in the Setting of Historic Designed Landscape

PCAN 12: Evaluation of New Landscape Features

PCAN 13: Briefs for Historic Landscape Assessments

PCAN 14: Management Plans (including Statements of Significance)

Appendix 1: Lists of subsidiary development generated by particular types of change

Appendix 2: General Evaluation Checklist (All types development/all types landscape)

Appendix 3: Planning Context

Planning Conservation Advice Notes 1 to 12 deal with some of the most common types of change proposed in historic landscape or its setting. Notes 13 and 14 describe documentation required to evaluate and support proposals for such change. Appendices 1 to 3, which separate out specific aspects of proposals in note form for quick reference, may also be useful for evaluation of types of change not covered in PCANs 1 to 12.

Format

PCANs 1 to 12 are divided into the following sections:

Section 1.0: Introduction

Section 2.0: Information Needed to Evaluate the Impact of Proposals

Section 3.0: Further Information Needed

Section 4.0: Potential for Mitigation

Section 5.0: Watchpoints

Section 6.0: Unavoidable Development/Damage

Section 7.0: Application of Advice

Section 8.0: Planning Context

Section 9.0: Evaluation

Evaluation

Most sections follow a set format but Section 9.0 on evaluation differs between various PCANs.

PCANs 3; 6; 8; 9; 10; 11 have a flow chart evaluation questionnaire. This may assist planning officers in particular, both in assessment of proposals and in preparation of recommendations for committee – the advice shown in upper case and bold type being intended to inform particularly on the following:

- level of potential impact
- further input which may be needed from other professionals
- further information which may be required
- where condition or legal agreement would be required to avoid adverse impact

PCANs 1; 2; 7 have checklists of questions intended to:

- highlight other relevant evaluation tools
- highlight potential implications of proposals
- list questions relevant to evaluation of impact

PCANs 4; 5 have short checklists of questions intended to:

- direct evaluation to specific conservation advice in the relevant PCAN
- assist evaluation by highlighting potential implications of proposals

PCAN 12 seeks to assist evaluators by offering conservation advice for particular situations.

Current status of advice notes

These planning conservation advice notes may be amended following trialling or with the introduction of new legislation. Any comments, and suggestions for improvement would be welcomed by the Society and feedback on content, usefulness, layout etc. of the sections on evaluation (including flow-charts) would be particularly appreciated.

Acknowledgements

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APPENDIX 1

Potential Implications of Specific Uses of Landscape (facilities, subsidiary development etc. which may be generated by specific uses).

The list below outlines some of the facilities, subsidiary development and potential impact which may be generated by particular uses. However, every case should be evaluated individually and this list should not be seen as exclusive.

See also *GHS PCAN 1: Change of Use (of landscape, and of principal and/or subsidiary buildings)*

PCAN 2: Hotel and Leisure Development

PCAN 3: Extension of Educational/Institutional Establishments

PCAN 4: Executive Housing

PCAN 5: Golf

PCAN 6: Vehicle Parking and Access

PCAN 7: Treatment of Boundaries and Entrances

PCAN 9: Development of Domestic Amenities

PCAN 10: CCTV and Lighting

PCAN 12: Evaluation of New Landscape Features

A1.1 Leisure and Sports Centres:

Games courts (grass & hard with enclosures)

Swimming pools (with associated hard surfaced surrounds, pool covers and service buildings)

Sports pitches (e.g. football, soccer, lacrosse, with ground recontouring, lighting etc.)

Riding (see below A1.8)

Water sports (with slipways, storage buildings for equipment)

Refreshment facilities (additional buildings)

Lighting, signage and CCTV (around central structures, drives, vehicle parks, sports pitches)

Vehicle parking and access (including coaches and school buses)

Traffic management measures (passing bays, speed bumps, mini roundabouts etc.)

Service and delivery access (+ bin and fuel stores, laundry facilities etc.)

Increased noise levels from specialist leisure activities (e.g. model aero clubs)

Potential for reduced maintenance and management of outlying areas

Potential for sale and subletting of unused structures and areas

A1.2 Health Centres and Spas

Games Courts (grass and hard with enclosures)

Swimming pools (with associated hard surfaced surrounds, pool covers and service buildings)

Riding (see below A1.8)

Trim Trails (possible ground recontouring and new access ways)

Creche facilities (including childrens play areas and colourful play equipment)

Lighting, signage and CCTV (around central structures, drives, vehicle parks, games courts)

Traffic management measures (passing bays, speed bumps, mini roundabouts etc.)

Vehicle parking and access (including coaches)

Service and delivery access (+ bin and fuel stores, laundry facilities etc.)

Potential for reduced maintenance and management of outlying areas

Potential for sale and subletting of unused structures and areas

A1.3 Hotel and Conference Centres

Golf (see *GHS PCAN 5*)

Obstacle courses and special recreational activities (e.g. shooting and fishing with construction of individual platforms, and location points, damming of watercourses etc.)

Erection of marquees: special events (access for specialist vehicles and erection platforms for framed marquees, recontouring of ground, ground erosion and compaction)

Lighting, signage and CCTV (around central structures, drives and vehicle parks)

Traffic management measures (passing bays, speed bumps, mini roundabouts etc.)

Vehicle parking and access (including coaches)

Service and delivery access (+ bin and fuel stores, laundry facilities etc.)

See also recreational facilities under A1.1 and A1.2 above

Potential for reduced maintenance and management of outlying areas

Potential for sale and subletting of unused structures and areas

A1.4 Schools

Intensification of use of areas of high ornamentation i.e. immediately adjacent to key buildings (desire line paths, ground erosion and compaction etc.)

Games Courts and pitches (hard and grass, with ground recontouring, goal posts, lighting etc.)

Swimming pools (with associated hard surfaced surrounds, pool covers and service buildings)

Play grounds (hard surfacing with play equipment)

Lighting, signage and CCTV (around central structures, vehicle parks and sports pitches)

Traffic management measures (passing bays, speed bumps, mini roundabouts etc.)

Vehicle parking and access (including coaches and minibuses)

Service and delivery access (+ bin and fuel stores, laundry facilities etc.)

Potential for expansion of facilities and additional buildings

Safety and security measures

Potential for reduced maintenance and management of outlying areas

Potential for sale and subletting of unused structures and areas

Requirements for compliance with Disability Discrimination Act (ramps, widened access, disabled parking spaces etc.)

A1.5 University and Other Institutional Use

Intensification of use of areas of high ornamentation i.e. immediately adjacent to key buildings (desire line paths, ground erosion and compaction etc.)

Separate student accommodation blocks (with multiple areas of vehicle parking)

Sports areas and facilities (ground recontouring, additional buildings)

Lighting, signage and CCTV (around central structures, vehicle parks and sports pitches)

Traffic management measures (passing bays, speed bumps, mini roundabouts etc.)

Vehicle parking and access (including coaches and minibuses)

Service and delivery access (likely to be multiple points + bin and fuel stores, laundry facilities etc.)

Potential for expansion of facilities and additional buildings

Potential for reduced maintenance and management of outlying areas

Potential for sale and subletting of unused structures and areas

Requirements for compliance with Disability Discrimination Act (ramps, widened access, disabled parking spaces etc.)

For religious institutions include potential for specialised new build (e.g. chanting halls) commemorative planting and burial grounds.

A1.6 Principal Building to multiple residential units

(holiday home complexes and mobile home parks carry similar implications)

Landscape division into multiple small garden plots (multiple choice planting, varied treatment of boundaries which constitute internal landscape divisions, garden sheds and play equipment)

Hard Standing for cars and caravans, and multiple garages

Communal play areas (with play equipment)
Multiple bin and fuel stores (+ areas for drying linen)
Traffic management measures (passing bays, speed bumps, mini roundabouts etc.)
Signage and lighting of communal areas and drives
Security measures (e.g. CCTV)
Service and delivery access
Potential for reduced maintenance and management of outlying areas
Divided landscape management (potential for sale and subletting of unused structures and areas)

A1.7 **Conversion of structures to residential use**

Extension or new build to accommodate essential facilities (bathrooms, fuel stores, garaging etc.)
New landscape divisions for ornamental gardens (alien planting and boundaries, garden sheds and play equipment)
Additional fenestration (e.g. on former farm buildings)
Vehicle access, hard standing and garaging
Service and delivery access
Divided landscape management

A1.8 **Use for animals and birds**

Grazing enclosures
Perimeter (security) enclosures
Animal housing and aviaries (with solid bases and dry access routes)
Feed and equipment stores (potential for additional structures)
Delivery access (feed)
Waste disposal (run off to ornamental water features/courses with alteration in vegetation)

HORSES

Subsidiary buildings (horses are bulk fed from other sources and subsidiary buildings are often needed: stables, tack rooms, feed stores)
Vehicular access (for feed delivery)
Vehicle standing (horse boxes)
Grazing enclosures (usually require post and rail site division for security; similar requirements with special surfacing [e.g. bark] for areas of manege)
Growth of grass over parkland becomes uneven (partially because of paddocking but also because horses dung in particular areas)
Horses' hooves cut deeply into turf (uneven appearance of grassland)

A1.9 **Domestic Amenities**

SWIMMING POOLS

Servicing (Pumps and plant housing)
Additional facilities (changing and showering)
Colourful pool and play equipment (particularly diving boards)
Hard surfacing (around the edges of a pool, and for access, seating, barbeques etc.)
Potential for later additional structures (e.g. covering of an initially open-air pool)

TENNIS (AND OTHER) GAMES COURTS

Contours which conflict with surrounding topography (and highlight the presence of the amenity)
Coloured and hard surfacing
High perimeter enclosures
Equipment stores (nets, line markers, mowing machines etc.)
Lighting

CHILDREN'S PLAY AREAS

Surfacing (and internal boundary delineation of 'safe surfaced' areas)

Access paths

Highly coloured play equipment

Play equipment sited at high level

Security fencing (if the area is some distance from a main residence)

Ground compaction, and 'wear and tear' on existing planting (+ difficulty of establishing new planting in such areas)

GARAGES

New entrances and access routes

Changes to entrances and access routes (including surfacing)

Hard standing (with views of parked vehicles)

Potential for increased traffic on the wider historic landscape

Lighting and security measures

Potential for increase in height at a later date (e.g. for games rooms, storage areas etc.)

Potential for dominance in scale of existing historic buildings (e.g. where associated with converted lodges or ornamental landscape buildings)

PROVISION FOR ANIMALS AND BIRDS (See A1.8)

HORSES (See A1.8)

A1.10 Commercial & Office

Lighting, signage and CCTV (individual commercial units, drives and vehicle parks)

Traffic management measures (passing bays, speed bumps, mini roundabouts etc.)

Vehicle parking and access

Service and delivery access (+ bin and fuel stores, laundry facilities etc.)

Outdoor leisure areas immediately adjacent to buildings (hard surfacing and seating)

Expansion of commercial operations with additional structures (e.g. in nursery use of walled gardens)

Reduced maintenance and management of outlying areas

Potential for sale and subletting of unused structures and areas

A1.11 Events and Exhibitions

Potential (through regular renewal of temporary consent) for events and exhibition areas to become permanent features with:

Subdivision of historic landscape into internal enclosures

Additional access and parking (include commercial vehicles, caravans etc. with potential for recontouring of ground to accommodate, land erosion and compaction, surface pollution)

Fixed tents/marquees/mobile commercial units (include refreshment and convenience facilities)

Floodlighting and security measures e.g. CCTV

New landscape features (e.g. art and statuary exhibitions)

A1.12 Golf

Contour changes (tees, fairways and bunkers)

Planting (ornamental, short-lived trees e.g. cherry, willow etc.)

Club houses (new structures, e.g. where a mansion is not within ownership or tenancy)

Vehicle parking and access

Removal of large areas of grass and replacement with sand lined bunkers

Changes in outline of water features

Altered management regimes for grassland

Inappropriate or premature tree removal or pruning (health and safety – needs of the drive)

Inappropriate management of mature parkland trees (e.g. where areas of rough are designed under parkland trees, developing understorey may compete with requirements of the trees)

Irrigation requirements

Maintenance buildings

Conveniences (on large courses, such facilities may be required around the course)

Access around and within a course for golfing buggies (hard or reinforced surfaces and paths)

Alien grass species (colour change)

Loss of grazing lines under parkland trees

Buggy and golf equipment stores

See also *GHS PCAN 5: Golf in the Historic Landscape*

A1.13 **Burial Grounds (including grounds for scattering of ashes)**

Vehicle access and parking

Ornamental and commemorative planting (species and position may conflict with landscape design or its repair)

Additional structures (for supervision/administration)

Boundary definition (hedges, fences etc.)

Potential for ecological management to conflict with historic landscape conservation management

A1.14 **Country Parks**

Vehicle access and parking

Refreshment and convenience facilities

Potential for ecological management to conflict with historic landscape conservation management (e.g. in treatment of waterside margins)

Potential for new access ways and paths to conflict with designed landscape layout

APPENDIX 2

General Evaluation Checklist

The following checklist highlights the questions which a specialist evaluator would be most likely to ask when considering proposals for change to historic landscape and/or its setting. As well as considering the most common elements of proposals, the list also includes questions on the way in which proposals are presented and the advice and guidance which has been produced to protect and conserve historic landscape.

Questions should be taken to apply to the historic landscape *and its setting*.

For detailed evaluation of specific development proposals see Garden History Society Planning Conservation Advice Notes (GHS PCANs).

A2.1 Questions about: Planning and Listed Building Consent Applications

What is the type of consent applied for (e.g. full, outline, temporary, approval of reserved matters, listed building, etc.)?

Where an application is for approval in outline:

Is outline approval appropriate to the location and extent of proposed works?

Is sufficient information available to allow detailed evaluation of the potential impact upon the historic landscape of the proposed development and subsidiary development which will be generated?

Where an application is for temporary consent:

Are proposals put forward to fulfil a temporary need (e.g. to host an event)?

Are proposals put forward as an interim measure while a long-term solution is sought?

Where an application is for renewal of temporary consent:

Have there been previous applications for renewal of temporary consent for the identified works?

Will renewal of consent result in inappropriate works, or works which have not been fully evaluated, effectively becoming a permanent feature of a landscape?

Will renewal of consent defer consideration of a more appropriate long term solution?

Where an application is one of a several for the same landscape by the same proposer:

Can the cumulative effect of development be properly assessed from piecemeal proposals?

Can appropriate conservation gain be secured for the landscape if a series of piecemeal proposals are put forward?

Will piecemeal proposals result in fragmentation of historic landscape management?

Where an application is put forward as Enabling Development:

Have English Heritage Guidelines on such development been followed?

See: *Enabling development and the conservation of heritage assets*. English Heritage, London. 2001.

Does the authority have the resources to scrutinise such proposals or is independent assessment required?

Where an application is for Listed Building Consent:

Have potential changes to the setting of the listed building been assessed?

Is the building/structure a designed feature of the historic landscape?

Is the building (and its internal design) particularly associated with the landscape (e.g. an orangery)?

A2.2 Questions about: Designations and Guidance

Designations

Is the site included on the *English Heritage Register of Parks and Gardens of Special Historic Interest* or, in Wales, the *Cadw/ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales* (i.e. accounted as of national importance and usually referred to as 'registered')?

Is the site included on a local list or inventory (i.e. of regional or local significance. Many of these sites are potential candidates for the Register) and if so, is this covered by the local plan policy – see below?

Is the site included on the county Sites and Monuments Record; SMR (where county archaeological departments have considered historic landscape, the SMR will usually include both registered and non-registered sites)?

Does the site include listed buildings and structures?

Does the site include buildings and structures which are not listed in their own right but which are designed elements of a historic landscape (where the landscape is registered such buildings/structures are an integral part of a nationally important heritage asset)?

Does the site contain scheduled ancient monuments (SAMs) or areas of archaeological significance?

Does the site have Conservation Area status (the boundaries of a number of historic landscapes are coincident with those of conservation areas)?

Is the historic landscape included within special county designations (e.g. 'special landscape area'; 'county treasure' etc.)?
Are other local designations applied to parts or elements of the site (e.g. tree preservation orders)?

Guidance

What Planning Policy Guidance (PPG) is specific to the site or to elements (e.g. *PPG15: Planning and the Historic Environment*; *PPG 16: Archaeology and Planning*)?

Has Supplementary Planning Guidance (SPG) on Historic Landscape been produced (and adopted) by either the county or by district planning authorities?

What is the County Structure Plan Policy for historic landscape?

What other County Structure Plan Policies apply

- to the whole site?
- to designated areas or features of the site?

What is the Local Plan Policy for historic landscape?

Does the relevant local plan policy cover historic designed landscapes of regional or local interest as well as registered sites?

Where a landscape is not registered

Is there an appended list which includes the site?

Is there potential for inclusion of further sites within the plan period?

What other Local Plan Policies apply

- to the whole site?
- to designated areas, features or elements of the site?

Has the site been outlined in the Local plan for development or for a specific use? If so:

What extent of the site has been so outlined?

What is the use specified?

Has extent of development been defined?

Has the local authority produced a Development Brief for the site?

Is the site otherwise 'earmarked' for development (e.g. major developed site in the green belt)?

A2.3 Questions about: Drawings and Documentation

Are the drawings and plans which accompany proposals at a suitable scale to identify the effect of proposals upon the historic landscape?

Where primary proposals relate to buildings/structures, do the drawings and plans which accompany proposals include the curtilage and/or designed setting, the location and details of any associated subsidiary development, the full extent of access routes where these cross the historic landscape and identify any proposed traffic management measures?

Is there a clear plan(s) of the landscape as existing?

Is there a clear plan(s) of the landscape as proposed at the same scale as that used for the landscape as existing?

Are photographs of relevant areas/features of the landscape included?

Are photomontages of proposed development within the existing and proposed landscape setting included?

Does a justification statement accompany proposals? If so:

Does it demonstrate:

A good understanding of the development history of the specific landscape?

Appreciation of good conservation practice in respect of historic landscape?

That alternatives have been considered and explain the advantages the chosen scheme has for the historic landscape?

Does it include evaluation of:

The significance of surviving areas, features and elements of the historic landscape?

The potential for repair of the historic landscape?

Do proposals flow clearly from all the above considerations?

Does a historic landscape assessment accompany proposals?

Are proposals supported by an up-to-date conservation management plan?

Has a development brief or supplementary planning guidance been produced which is relevant to this site? If so:

Is this up-to-date?

Is it sufficiently detailed in respect of conservation of the historic landscape?

Do proposals accord with such guidance?

A2.4 **Questions about: Use**

For what purpose were buildings and landscape designed?

What is the existing use of buildings and landscape?

What is the proposed use of buildings and landscape?

Would proposed use alter the character of the historic landscape?

What are the implications for the landscape of proposed use e.g.

Would the use proposed confer additional permitted development rights?

Would proposals result in significantly increased use of areas of the historic landscape?

Can such increased use be accommodated in these areas without adverse effect?

Would proposed use result in fragmentation of ownership of the historic landscape?

Would proposed use result in reduction in, or fragmentation of, management of the historic landscape?

What subsidiary development would be generated by the proposed use? – See *GHS Appendix 1*

Do any special circumstances apply to proposed use (e.g. disabled access, flood prevention etc.)?

See also *GHS PCAN 1: Change of Use*

A2.5 **Questions about: Management**

Have proposals been put forward for landscape management? If so:

Are these essentially for landscape maintenance (i.e. maintenance of site elements as existing without repair, renewal or phased replacement)?

Are proposals for conservation management (including repair, renewal and phased replacement), and are they supported by a conservation management plan?

Are management proposals for all or part of a historic landscape?

Will management needs in respect of storage and maintenance of equipment, storage of materials, garden maintenance areas, appropriate staffing levels (and accommodation where required) be met by proposals?

Where areas are to be grazed by stock, have necessary subsidiary structures for housing and feed stores, and required vehicle access been identified?

Will appropriate conservation management for the entire historic landscape be secured as a result of proposals?

Who will oversee such management?

Is information available to allow detailed comparison between historic landscape management regimes intended to maintain design intention (e.g. grazing of parkland, clearing vegetation from views and vistas, removal of invasive understorey, dredging of water bodies, mowing down of bankside vegetation etc.) and proposed landscape management regimes?

Will proposed landscape management conflict with historic landscape management?

Do proposals include ecological management of particular areas? If so:

Will proposals for ecological management conflict with historic landscape conservation management?

Has management of water across the landscape been considered?

Has traffic management been considered?

A2.6 **Questions about: Changes to Landscape Areas**

Do proposals (including subsidiary development) affect the setting of the historic landscape?

Do proposals (including subsidiary development) affect the setting of listed buildings?

Do proposals (including subsidiary development) affect significant areas, features or elements within the historic landscape? If so:

How has such significance been determined?

By visual inspection alone?

By historic landscape assessment?

By reference to an existing conservation management plan?

Is such effect positive or negative in respect of the historic landscape?

Has the potential for repair of the historic landscape been assessed in formulation of proposals?

How has the proposals site been chosen?

What alternatives have been considered?

Would alternatives have a greater or lesser impact upon the historic landscape or its setting?

Are proposals generated by the needs of the historic landscape?

Are proposals within an already developed area? If so:

Has the significance of the area to the remaining designed landscape been evaluated?

Do findings indicate that repair of this area should be a first priority (and alternative location for development found)?

Is there potential for improvement of this area (in respect of the historic landscape) as a result of proposals?

Will proposed works be visible from outside this area?

A2.7 Questions about: New Buildings and Structures

Do proposals involve new buildings/structures?

What is the size of each building/structure?

From what areas of the landscape will the building/structure be visible?

What parts of the building/structure will be visible?

Will seasonal changes in planting affect the visibility of the building/structure?

Will the building/structure be highlighted in long views across the landscape (e.g. by light reflection from fenestration, bright surface colours etc.)?

Will view(s) of the new building/structure conflict with the existing landscape layout (e.g. will it impact on views, vistas, designed landscape compositions, panoramas etc.)?

Will the footprint of the new building/structure result in loss of important landscape areas?

Will pedestrian access affect existing circulation patterns?

What type of vehicles will access the building/structure (coaches, service and delivery etc.)?

How will vehicle access (type and frequency) affect existing circulation patterns?

Will the building/structure have a new, defined curtilage?

How will the building/structure curtilage be managed?

Will proposals result in fragmentation of ownership and/or management of the historic landscape?

Will vehicle parking be required?

Will added security measures be required for the building/structure?

See also *GHS PCAN 12: Evaluation of New Landscape Features*

A2.8 Questions about: New Facilities

From what areas of the landscape will the facility be visible?

Is the facility likely to result in significant adverse impact (see A2.10: Adverse Impact)?

Will proposed works set a precedent for similar works elsewhere on the historic landscape? If so:

Could the historic landscape accommodate proliferation without adverse effect?

Can proposals for other facilities reasonably be expected to follow (e.g. requests for spectator seating and/or refreshment facilities following designation of areas for sports)?

How will the facility be maintained?

What vehicle access (type, level and frequency) will be required?

Would this affect the wider landscape?

Will vehicle parking for the facility be required?

Will security/lighting/signage be required?

What height would this be?

Where would this be located?

Will the footprint of the facility result in loss of important landscape areas?

Will the facility result in significantly increased use of areas of the landscape? If so:

Can such increased use be accommodated in these areas without adverse effect?

Will proposals result in fragmentation of ownership and/or management of the historic landscape?

Will proposals result in appropriate management of areas of the historic landscape?

A2.9 Questions about: Changes to Existing Buildings and Structures

Will proposals result in change in use of existing buildings/structures?

Is the existing use obsolete or will the facilities provided need to be relocated?

Is the existing building/structure a feature of the historic landscape?

Are particular facades or parts of the building/structure designed to be viewed from the historic landscape?

Will extension of the building/structure be required? If so:
 Would the extension be visible within designed views?
 Would the extension affect the character of the building/structure?
 Would the scale of the extension be appropriate?
 Would the footprint of the extension result in loss of important landscape areas?

Is there existing vehicle access to the building/structure?
 Will different types of vehicles need to access the building/structure (e.g. service and delivery etc.)?
 Will increased levels of vehicle access be required?
 Will any new vehicle access affect existing circulation patterns in the wider landscape?
 Will the building/structure have a new, defined curtilage?
 How will the building/structure curtilage be managed?
 Will proposals result in fragmentation of ownership and/or management of the historic landscape?
 Will vehicle parking be required?
 Will added security measures be required for the building/structure?

A2.10 **Questions about: Adverse Impact**

Has potential adverse impact on the historic landscape been evaluated?
 What type of adverse impact will result from proposals (e.g. noise, physical damage, visual intrusion, fragmented management etc.)?
 What extent of the historic landscape would be affected by adverse impact?
 Will areas of special significance be affected by adverse impact?
 Is mitigation of adverse impact proposed? If so:
 Will such mitigation reduce the level or wholly eliminate the adverse impact?
 Is the mitigation proposed appropriate in this landscape in this location?
 If planting is proposed in mitigation of adverse visual impact
 Will this be effective at all seasons of the year?
 Can this be maintained in perpetuity?
 Could any proposed mitigation of adverse impact be effectively tied to any consent a planning authority may be minded to grant?
 Is development reversible?

A2.11 **Questions about: Potential for Future Works**

Is future extension of proposals likely (e.g. if a project is commercially successful)?
 If implemented would current proposals set a precedent for future extension?
 Has the level of vehicle parking required been comprehensively evaluated: including the following:
 Will there be seasonal variations in levels of vehicle parking?
 Will additional parking areas be required for events?
 Does the stated level of vehicle parking include casual visitors?
 Will service and delivery vehicles use designated parking areas?
 Has the full extent of vehicle routes through the historic landscape been examined and any changes which may be required identified (e.g. to entrances, bridges, width of drives/avenues etc.)?
 Has need for traffic management measures been examined (e.g. in peak use periods)?
 Have former service buildings been converted to other uses? If so:
 Will new uses require additional service buildings (e.g. staff accommodation; storage for maintenance equipment)?
 Are proposals likely to generate demand for increased security/lighting/signage?
 Are proposals likely to generate demand for removal of/changes to planting (e.g. if light or views become restricted in occupied buildings)?

A2.12 **Questions about: Conservation Gain**

Is the historic landscape covered by an up-to-date conservation management plan (CMP), based on a full historic landscape assessment (HLA)?

Are landscape repair works included in proposals? If so:

Are these supported by a CMP?

Are such repair works commensurate with levels of proposals?

Do proposals include a new landscape design layer for part of the landscape? If so:

Is this supported by a CMP?

Will proposals increase cohesion of historic landscape management?

Will proposals improve levels of historic landscape management?

Will proper future conservation management of the historic landscape be secured as a result of proposals?

Where a S106 Agreement for future conservation management of the historic landscape (as described by a CMP) is to be tied to consent:

Does this cover all the historic landscape?

Are identified works outlined (e.g. under conservation aims) or presented as an itemised programme?

Has a timescale within which works are to be completed been agreed ?

Is a management company to be set up to administer future management? If so:

How is such management company constituted and what is its remit?

Would any changes to proposed future management require to be approved by the planning authority?

Will a historic landscape consultant be retained?

Where conservation gain is to be tied to consent, whether by S106 Agreement or condition:

Has a course of action been agreed and arbitrators identified in case of dispute over implementation of conservation works?

Is the planning authority confident that resources will continue to be available to adequately monitor agreed conservation gains?

A2.13 Further Guidance on common questions

A2.13.1 Has the landscape been designated as of national, regional or local significance?

Sites included on the *English Heritage Register of Parks and Gardens of Special Historic Interest* and, in Wales, the *Cadw/ICOMOS Register of Parks and Gardens of Special Historic Interest in Wales* are accounted as of national importance.

Historic designed landscapes of regional or local significance may be identified on local inventories or county sites and monuments records. Such lists may be appended to a relevant local plan policy. Since the English Heritage Register is not a finite list, a number of these sites will almost certainly ultimately be included. Identification of historic landscapes of importance is an ongoing process. As well as the previously unrecognised designed landscapes which continue to be added to lists, new types of designed landscape of significance may also be identified. Some adopted local plan policies allow for new sites to be added during the plan period.

A2.13.2 Are there additional designations for areas or features of this landscape and/or its setting?

Both national and local designations may apply to certain areas and features of a historic landscape (e.g. scheduled ancient monument (SAM); listed structure; site of special scientific interest (SSSI); conservation area; tree preservation orders etc.).

A2.13.3 What policies in the local plan or county structure plan apply?

The majority of Local Plans and County Structure Plans now have policies which refer directly to historic landscape. Other policies, usually under the heading of 'Built Environment', may relate to specific elements or designations e.g. 'SAM's and archaeological sites'; 'Buildings of architectural and historic interest' and 'conservation areas'. Some historic sites may also be included within such designations as 'special landscape areas' or 'landscape character areas'.

A2.13.4 What additional guidance applies?

Extensive guidance is contained in the range of PPGs (Planning Policy Guidance). *PPG15: Planning and the Historic Environment* is particularly relevant to historic landscape.

Local authorities may produce Supplementary Planning Guidance in respect of historic landscapes within their area and specific development briefs for particular sites; both will outline standards to be expected in conservation and in proposals for change.

A2.13.5 **Have proposals been fully explained?**

Proposals for change may concentrate on certain aspects and neglect others e.g. application for conversion of a building to residential use may be presented with detailed architectural plans but no indication of how vehicular access to the structure will be gained, or the extent and definition of curtilage proposed. Similarly, where proposed works are for more than private use, the type of use may be explained but not anticipated extent and frequency.

Proposals for change should always be accompanied by information on subsidiary development.

(See also *GHS Appendix 1*)

A2.13.6 **What information about this landscape has been presented with the application?**

To evaluate proposals for change on historic landscape it is necessary to understand both the proposals and the landscape. The type and extent of proposals is clearly important but, unless the significance of the areas of landscape which these will affect is fully understood, it is impossible to evaluate their impact.

Areas and features of particular significance within historic landscape or its setting may be identified through visual inspection (e.g. garden structures, clearly designed areas such as formal and walled gardens, views, vistas, designed landscape compositions etc.). However, not only does the extent of significance, in respect of the development history of a particular landscape and of national landscape history, require specialist evaluation, the potential for repair also needs to be assessed.

Where a historic landscape has been unmanaged or inappropriately managed for some time, features and areas of significance may have lost definition or, in some instances, been entirely obscured. Evaluators need to ensure that development will not compromise future repair of important historic landscape features (e.g. the reopening of a vista through woodland; replanting of a pleasure ground, re-establishment of formal garden features and layout etc.).

A historic landscape assessment will confirm such potential for repair in cases of doubt.

(See *GHS PCAN 13: Brief for Historic Landscape Assessments*)

A2.13.7 **What other information about this landscape is readily available?**

Where a site is registered, a broad outline of its development history will be available in the Register entry produced by English Heritage; the accompanying map providing a useful guide to the extent of the designed landscape. Similar levels of information may be produced in inventories of sites of regional or local significance. SPG produced by some local authorities may also give a broad outline of the development history of particular sites.

N.B. The above information is essentially a precis of a site's development history and almost always requires expansion, interpretation and evaluation in the context of proposals for change. An up-to-date comprehensive conservation management plan, based on a full historic landscape assessment, is the best source of information for evaluation of proposals for change. An increasing number of historic landscapes are covered by such plans.

A2.13.8 **Is the information available sufficient to reach an informed decision on potential impact of proposed changes?**

Where proposals are for a single, small scale, new feature or element (e.g. ornamental water spouts; new path, sundial etc.), or where only a very small minority of a historic landscape is within the ownership of a proposer, it may seem unreasonable to require a comprehensive (and costly) conservation management plan to inform and support proposals. In such cases, provided that no existing features or elements are to be removed, authorities may wish to consider granting temporary consent and requiring the proposer to undertake sufficient research* to provide a supporting justification statement on application for renewal.

However, where proposals are for more extensive works, if the information provided does not answer relevant questions and allow full evaluation of the effect of proposed changes upon historic landscape, these shortfalls should be clearly identified. The outcome of proposals may be materially improved by advising potential applicants at an early stage of the way in which an application on historic landscape should be presented and the standards which will be expected.

*Proposers may be assisted by reference to relevant planning conservation advice notes (PCANs), in particular:

GHS PCAN 12: Evaluation of New Landscape Features

PCAN 13: Briefs for Historic Landscape Assessments

PCAN 14: Management Plans (including Statements of Significance)

APPENDIX 3

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. Planning Policy Guidance differs between England and Wales and the appropriate PPG or Planning Policy Wales should be consulted for individual cases.

Further information may be accessed via the planning website (see A3.15 below).

PLANNING CONTEXT: ENGLAND

PPG 8 Telecommunications

- A3.1 Under the **General Policy** section of this PPG, it is noted that, ‘The government places great emphasis on its well established national policies for the protection of the countryside and urban areas – in particular ... The Heritage Coast and areas and buildings of architectural or historic importance’.
- A3.2 Paras 14 and 15: **Environmental consideration** refer to ‘protection from visual intrusion ... as an important consideration in determining applications’.
- A3.3 Para 20: **Mast and Site Sharing** notes, ‘Authorities will need to consider the cumulative impact upon the environment of additional antennas sharing a mast or masts sharing a site’
(The response to point 8 of the committee report 2000–2001, quoted below, observed, ‘However, mast sharing is not always the most suitable solution for a particular development. A couple of slim and unobtrusive masts, for example, may well be better than one cluttered one’.)
- A3.4 Para 24: **Design** notes, ‘In seeking to arrive at the best solution for an individual site, authorities and operators should use sympathetic design and camouflage to minimise the impact of the development on the environment. Particularly in designated areas, the aim should be for the apparatus to blend into the landscape’.
And para 25 encourages continuation of development of innovative design, ‘... in terms not only of the structure of masts and antennae but also of materials and colouring’. Para 28 refers to careful consideration regarding screening and planting.
Consultation on applications: Response in government session 2000/2001 to the committee report on mobile phone masts* indicated intention to strengthen public consultation requirements on mobile phone masts below 15m in height, ‘so that they are exactly the same as for mast proposals above 15m in height which require application for planning permission’
*DETR consultation paper 31st July 2000 (proposed amendments to planning legislation under Part 24 of the General Permitted Development Order and related Guidance including *PPG8: Telecommunications*).

PPG15: Planning & the Historic Environment

- A3.5 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*)
- A3.6 Para 2.16 notes that when authorities consider applications for planning permission or listed building consent for works which potentially affect a listed structure they should pay special regard to certain matters including the desirability of preservation of the setting of a listed building.
Para 2.16 also notes that, ‘The setting is often an essential part of the building’s character, especially if a garden or grounds have been laid out to complement its design or function and para 2.17 continues, ‘In some cases **setting** can only be defined by a historical assessment of a building’s surroundings’.

A3.7 Para 4.6 notes that **conservation area** ‘... designation may well ... be suitable for historic parks or gardens and other areas of the historic landscape containing structures that contribute to their special interest’.
Para 4.40 directs that, ‘... when considering whether to extend protection to trees in **conservation areas**, local planning authorities should always take into account the visual, historic and amenity contribution of trees’.

A3.8 Para 2.24 notes that, ‘Planning and highway authorities should also safeguard registered parks and gardens when themselves planning new developments or road schemes’.
Para 5.2: **Transport & Traffic Management** continues, ‘Local highway and planning authorities should ... integrate their activities and should take great care to avoid or minimise impacts on the various elements of the historic environment and their settings’.
Para 5.3 notes that, ‘The Secretaries of State also attach particular importance to early consultation in traffic management and highway maintenance schemes, and associated development proposals which could affect listed buildings or conservation areas or parks, gardens or battlefields, and their settings’.

PPG16: Archaeology and Planning

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

A3.9 Section A: The Importance of Archaeology

A.3 instructs that, ‘Archaeological remains should be seen as a finite and non-renewable resource Appropriate management is therefore essential to ensure they survive in good condition ... They are part of our sense of national identity and are valuable both for their own sake and for their role in education, leisure and tourism.’

A3.10 Section B: Advice on the Handling of Archaeological Matters in the Planning Process

B16: **Development Plans**, ‘Authorities should bear in mind that not all nationally important remains meriting preservation will necessarily be scheduled; such remains and, in appropriate circumstances, other unscheduled archaeological remains of more local importance. may also be identified in development plans as particularly worthy of preservation.’

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 to withdraw those rights and to require specific planning permission to be obtained before development can proceed’.

B21: **(b) Field Evaluations** ‘Where early discussions with local planning authorities or the developers own research indicate that important archaeological remains may exist, it is reasonable for the planning authority to request the prospective developer to arrange for an archaeological field evaluation to be carried out before any decision on a planning application is taken.’

B22: ‘Local planning authorities can expect developers to provide the results of such assessments and excavations as part of their applications for sites where there is good reason to suspect there are remains of archaeological importance If necessary, authorities will need to consider refusing permission for proposals which are inadequately documented’.

PPG17: Planning for Open Space, Sport & Recreation

A3.11 Para 14: **Maintaining an Adequate Supply of Open Space And Sports And Recreational Facilities**
‘Parks, recreation grounds, playing fields and allotments must not be regarded as ‘previously developed land’ as defined in Annex C of PPG3. Even where land does fall within the definition of ‘previously developed’, its existing and potential value for recreation and other purposes should be properly assessed before development is considered’.

A3.12 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’

A3.13 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’.

A3.14 **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

A3.15 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

PLANNING CONTEXT: WALES

Llywodraeth Cynulliad Cymru

Welsh Assembly Government

Reference: 27 Welsh Office Circular 61.96

‘Planning and the Historic Environment: Historic Buildings and Conservation Areas’

6.5.23 Local planning authorities should protect parks and gardens and their settings on the first part of the ‘Register of **Landscapes, Parks and Gardens** of Special Historic Interest in Wales’. Currently, voluntary arrangements exist for consultation on planning applications affecting parks and gardens and their settings on the Register but it is expected that statutory consultation will be introduced in the near future. Information on the landscapes in the second part of the Register should also be taken into account by local planning authorities in preparing UDPs, and in considering the implications of developments which are of such a scale that they would have a more than local impact on an area on the Register (see para 6.4.10). The effect of proposed development on a park or garden contained in the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales, or on the setting of such a park or garden, may be a material consideration in the determination of a planning application.