

Sussex Gardens Trust

Encouraging the protection, conservation and evolution of the local garden heritage

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By e-mail to Horsham District Council
Parkside,
Chart Way, Horsham,
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17th August 2021

FAO Matthew Porter

Dear Sirs

DC/21/1603 Retrospective application for the construction of additional areas for visitor car parking at Leonardslee Lower Beeding Horsham West Sussex RH13 6PP

Thank you for consulting Sussex Gardens Trust (SGT) regarding the above application.

The Historic England Register of Parks and Gardens includes some 1600 sites and Leonardslee is one of the very small number (approximately 9% of the total) with a Grade I designation as a site of exceptional interest. Hence it is re vital that all parties give meticulous attention to the justification for approval of the application.

Process

SGT works closely with the Gardens Trust (GT), national umbrella organisation, on matters concerning registered parks and gardens. These are separate bodies and as a statutory consultee on applications affecting all Registered Parks and Gardens, the GT should be consulted directly on this application (via consult@thegardenstrust.org); similarly Historic England should be consulted, if that has not already happened.

Comments

Given the great increase in the size of the car park (from 248 to 724 spaces, an increase of nearly 300%), the scope of the application represents a major development.

The National Planning Policy Framework (NPPF) includes the following statements:

> *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected...* (para 194 of NPPF 2021 edition)
>
> *Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any*

> *necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.* (para 195 of NPPF 2021 edition)
>
> *When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.* (para 199 of NPPF 2021 edition)

SGT has a major problem with the application. The documents submitted describe the parking solution in detail; however, there is little information about the planned events giving rise to a need for additional parking, no assessment of the significance of the site and no heritage impact assessment (HIA) regarding the effect of more events and higher visitor numbers.

A new document has just been published by the Institute of Environmental Management & Assessment (IEMA) (in partnership with the Chartered Institute for Archaeologists (CIfA) and the Institute of Historic Building Conservation (IHBC)): *Principles of Cultural Heritage Impact Assessment in the UK*. The purpose of the doc is: *to establish an authoritative set of principles to promote good practice in cultural heritage impact assessment across the UK, and help achieve sustainable development for current and future generations* see https://www.iema.net/resources/blog/2021/07/20/launch-of-principles-of-cultural-heritage-impact-assessment

Conclusion

SGT objects to the approval of the application and requests Horsham District Council to ask the applicant to undertake a heritage impact assessment using a relevantly qualified professional. The scope of this should cover all parts of the site where events will take place as well as the car park areas.

Yours faithfully

Jim Stockwell.

On behalf of the Sussex Garden Trust.

Copy to: The Gardens Trust