



47 Denmans Lane
Haywards Heath
West Sussex
RH16 2JN

Via planning portal to: SDNPA

12th December 2016

Dear Sirs,

SDNP_16_05558_FUL Stanmer House: Removal of marquee & replacement in new location.

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

The Gardens Trust (TGT) - formerly the Garden History Society (GHS) - is a statutory consultee on matters concerning registered parks and gardens, and is now working closely with County Garden Trusts on matters associated with planning applications and planning policy.

Representatives of SGT have reviewed the documentation submitted with this application. Our comments are shown below. The application seeks retrospective planning consent for the removal of an existing marquee structure and its replacement with a new marquee structure in a new location alongside ancillary landscaping works.

Summary

The Sussex Gardens Trust objects to the application on the following grounds:

- The replacement marquee in the new location is substantially larger and in a much more prominent position directly in front of the south wing of Stanmer House. Approval of the application would cause substantial harm to the setting and significance of the Grade I listed House and the Grade II listed Park.
- While the application asserts there are public benefits, several of the benefits identified are invalid and the documentation submitted does not provide any convincing evidence to support others.
- Approval of the application would conflict with the Restoration Management Plan adopted by BHCC in 2003. The proposed development is inconsistent with the objectives included in the Plan and prejudices the future delivery of the restoration work reflected therein. The Trust's ambition is to open up the garden to wider unobstructed views from across the park.
- The application assumes the continuation of car parking both in front of the house and in the car park to the south of the Fountain Garden. This conflicts with the Restoration Management Plan and the recent approval of the restoration of Stanmer Park (SDNP/16/03927/FUL) which envisages the removal of both these car parks.

Material Considerations in the Planning Process

The site sits within Stanmer Park which is included in the Register of Parks and Gardens of Special Historic Interest with a Grade II designation. The inclusion in the Register means the Park is subject to a statutory designation, and has the same weight in policy terms under the National Planning Policy Framework (NPPF) as scheduled monuments and listed buildings.

Moreover the site is located in part of the formal Fountain Garden very close and directly in front of the south wing of Stanmer House, which is a Grade I listed building.

A detailed Historic Landscape Survey and Restoration Management Plan for Stanmer Park was adopted by BHCC in 2003 and this should be treated as a material planning consideration.

Significance of Stanmer Park, the Fountain Garden and Stanmer House

Paragraph 128 of the NPPF places an obligation on the applicant to describe the significance of any heritage asset and to produce an assessment of the impact of the proposals on that significance.

The application is supported by a Heritage Statement (Ref 734795.pdf) and sections 4, 5 and 6 of this document seek to identify the significance of the heritage assets and the impact of the proposals on significance. However this assessment fails to take account of the combined significance of the House in its setting in the Park and the relationship with the Fountain Garden.

Stanmer Park is of principal importance to the significance of Stanmer House. From the house the park creates a tranquil outlook over the park with the views to the east and south largely unchanged (see Fig 1).



Drawing of South and East Elevations of the House by Grimm, dated 1787



Fig 1 Stanmer House in late C18 and early C21

To the south, the reception rooms on the ground floor and the rooms on the upper floors look out over the Fountain Garden with distant views across the park to Brighton beyond (see Fig 2).



View from Stanmer House showing distant view across the Fountain Garden to the park and Brighton beyond (2016)

Aerial view 2007

Fig 2

The Heritage Statement fails to properly identify the significance of the Fountain Garden which lies in: (i) its illustrative historical value as an example of how an informal 18th century parkland garden evolved in the 19th century into a more formal garden; and (ii) its aesthetic value as a harmonious formal garden in front of a fine example of a formal Georgian house (see Fig 3 below). The structure and main features of this garden remain to this day (see Figs 2 above and 4 below), albeit there has been some degradation to the paths that surround the garden.



Early 20th Century Photographs of the Fountain Garden adjacent to the South Elevation

Fig 3

Impact of the Proposals on Significance

A marquee was originally erected on the northeast side of the Fountain Garden some years ago without planning permission. However in 2015 a certificate of lawful development was granted on the grounds that the marquee had been in place for more than four years. In this original position on the northeast side of the garden, most of the Fountain Garden and views beyond were visible from the rooms on the southeast wing of the house (see Fig 2), and the visual intrusion of the marquee viewed from the house was limited to a gable end view (see Fig4)



Fig 4 Marquee in Original Position

- **Impact on views from the Grade I Listed House**

More recently the permitted marquee was removed and a new larger marquee was erected in a much more prominent position directly in front of the south wing of the house. In this new position, views from the house are now severely restricted (see Figs 5 and 6 below) resulting in substantial harm to the house and its setting in the park and hence its significance.



Fig 5 Marquee in New Position - distant views to the south from the house now blocked

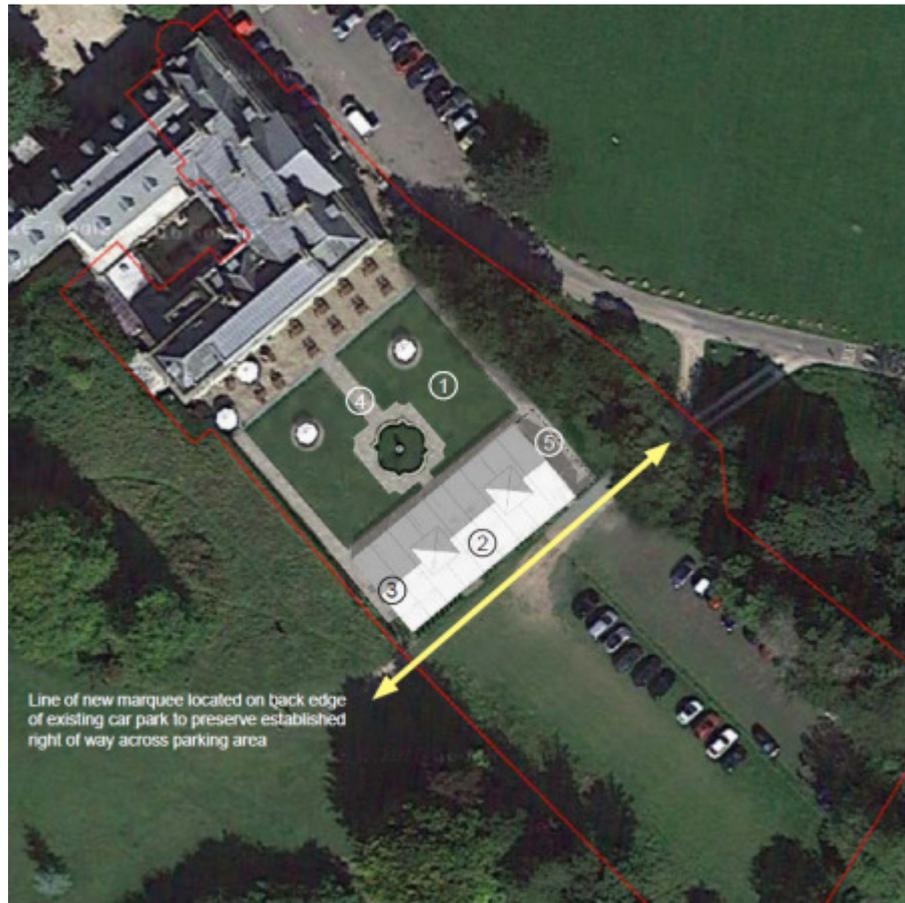


Fig 6 Marquee in New Position – distant views to the south from the house now blocked

- **Screening of Car Park**

The Heritage Statement acknowledges that in the new position the marquee is still seen from the house and goes on to comment that it will mask views of the car park. However the recently approved planning application for the restoration of Stanmer Park provides for the removal of this car park and in any event the planning permission granted in August 2016 only provides for temporary use (NB the application SDNP/16/03173/FUL sought temporary approval for a further three years but the letter of grant of planning permission did not show the expiry date, but we assume this to be 30 June 2019, 3 years after the expiry of the previous temporary permission). Even if the car park were to be retained, the Trust would advise the use of a more sympathetic method of screening – e.g. through the planting of a hedge. Screening of this temporary car park by the marquee is not a valid argument justifying the erection of the marquee.

- **Impact on Fountain Garden**

The garden area to the south of the house was originally laid out in the 18th century as informal parkland but later in the 19th century this area was remodelled as a more formal Fountain Garden. Fig 3 above shows how the garden looked in the early 20th century

The significance of the Fountain Garden described earlier is adversely impacted both by the marquee in its original position and the replacement marquee in the new position. However in the new position the marquee intrudes much further and now almost reaches the centre of the garden and further degrades the significance of the Fountain Garden.

The Restoration Management Plan referred to above includes a number of objectives and actions affecting the Fountain Garden and the garden/carpark beyond:

- Objective 5: To mitigate the adverse impact of the existing C20th developments, where this has been shown to exist. In some instances this may only be achieved through removal.
- Objective 6: To ensure that any mitigation measures that are found to be necessary are in accordance with the character of the C18th design.
- Objective 12: To resist any new development... unless it is demonstrably beneficial to the aesthetic quality of the landscape.
- C9: removal of the shrubbery and cherry orchard... to the south of the house / garden to re-establish the open aspect towards the parkland and reveal views towards Stanmer House.
- C10: the clearance of the conifer screen from the garden boundary ... to reveal visibility between parkland and house.
- SH1: Restore levelled garden to the south of the house.
- SH2: Repair the garden fountain.
- SH4: Remove the C20th garden extension.

- **Impact on Views from the Park towards the house**

Views of the house from the park will also be adversely affected particularly when approaching the house from the entrance and for walkers approaching the house from the southwest.

Conclusion on Significance

The replacement marquee in the new position will cause substantial harm to the significance of both the Grade I listed house the Grade II listed park.

Public Benefits

The Heritage Statement mentions a number of possible benefits. These are listed below together with the Trust's comments:

- ***"..the replacement marquee will provide 'enclosure to the garden space emphasising its symmetry . . .It will also allow for landscaping within the garden to develop its formality and celebrate the existing feature of the stone-edged pool."*** As explained earlier, the siting of the marquee in the new location conflicts with the approved Restoration Management Plan and would prejudice delivery of the planned restoration work.
- ***"In respect of the Council's design policies, the relocated marquee is a considerable improvement in terms of both siting and detailing"*** We don't understand why changes in "detailing" should be considered a public benefit. However even if they are a benefit, they could have been realised in the original location. We have already commented on the substantial harm caused by the move to the new location.
- ***'In respect of the Council's heritage policies, the proposal would have less impact on the setting of the listed building than the consented marquee'***. As explained above this is not the case.
- ***"siting that screens the car park"*** " – as explained above, this is not a valid justification because the car park is to be removed anyway
- ***"a far more efficient and effective use of the site that complements that of the house"***. We cannot find any evidence in the application to support this assertion.

Conclusion on Benefits

The possible benefits identified in the application are either invalid or not supported by evidence.

Overall Conclusion

The proposals are in conflict with the approved Restoration Management Plan and would result in substantial harm to the setting and significance of the Grade I listed house and Grade II listed park without any offsetting public benefits.

The marquee and temporary car park are intrusive features harmful to the setting of Stanmer House and the character of the park, and should be removed in line with the Restoration Management Plan and the proposals for the restoration of the park recently approved by SDNPA.

For these reasons the Trust objects to the application.

Yours sincerely

Jim Stockwell
On behalf of the Sussex Garden Trust.
CC: The Gardens Trust

