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Liz Hobden  
Head of Planning  
City Development and Regeneration  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ

21<sup>st</sup> March, 2017

Dear Madam,

**Planning application BH2017/00132: Installation of temporary event space in East/North lawns of Royal Pavilion Gardens, Brighton**

Thank you for notifying the Sussex Gardens Trust (SGT) of the above planning application. The Gardens Trust, (a national statutory consultee), has also brought this application to the SGT's attention.

The Grade I listed Royal Pavilion and the Grade II Registered Park form an internationally significant historic site. The Trust objects to the application because it will cause substantial harm to the significance of both the Park and the setting of the Royal Pavilion.

**Background**

In 2009 the Royal Pavilion commissioned an historic landscape consultant to prepare a Statement of Significance for the Royal Pavilion Gardens as part of the on-going development of a management plan for the Pavilion estate. This Statement of Significance describes a wide range of elements and in particular it identifies:

*"The garden is the setting for the City's most internationally-recognised icon; its eastern and northern lawns form part of the London Road 'green mile' scenery and as such, with Victoria gardens, St Peter's church land and The Level, contributes to a designed chain of historic open space of potentially high quality within the central Cityscape."*

The full statement is reproduced in the Annex to this letter.

## **Impact of the Proposals**

The site of the proposed temporary event space sits within the Royal Pavilion Park which is included in the Register of Parks and Gardens of Special Historic Interest with a Grade II designation. 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 directly in front of the east facade of the Royal Pavilion, which is a Grade I listed building. The Park forms a key element of the setting of the Grade I listed building viewed from the Old Steine and also views out of the windows of the Pavilion itself.

Viewed from the Old Steine, the setting of the Royal Pavilion would be adversely impacted by the facades proposed. Views out of the Royal Pavilion across the Park towards the Old Steine would be even more adversely affected, since these views would look across the service areas and the rear of the facades (the application does not describe the appearance of these parts of the structures).

If approved, the proposals would cause substantial harm to the significance of both the Grade I listed Pavilion and the Grade II Registered Park. Even as a temporary arrangement, there would still be substantial harm, albeit for a limited period of time. In these circumstances the Planning Authority is required under the National Policy Planning Framework to make a “balanced judgement” with regard to the scale of the harm and other factors. Unfortunately the documents submitted with the application do not include evidence of benefits such as an assessment of the possible economic benefits that might counterbalance the harm caused.

For some years a temporary ice rink has been installed on the same site between end Oct and mid Jan, with a 2 month restoration period - i.e. a total of some 4.5 months disruption. The present application assumes the site can be restored in just one week, which has not been the experience with the ice rink which has required parts of the site to be protected by unsightly barriers for up to two months. For the present application, the total period of disruption may extend to much more than the assumed 5 weeks.

The Trust believes there should be continuous unobstructed public access to this visually sensitive garden landscape, deserving of greater protection, both for its intrinsic historic merit and its contribution to the sensitive setting of the Royal Pavilion. This is particularly the case in the busy summer months when large numbers of visitors will wish to enjoy the peace and tranquillity of the historic gardens.

## **Conclusion**

The Brighton Festival succeeds in showcasing Brighton, and attracts visitors, who will also wish to enjoy the historic attractions in the city; none more appealing than the Royal Pavilion. This proposal will harm the garden setting of the Royal Pavilion, at a time when it can be enjoyed in all its regency garden glory. These gardens serve to provide the outlook from the principle high status rooms of the Pavilion and today a place for quiet enjoyment and rest. It is important not to treat this internationally significant historic site as a mere open space to be used as an events site or theme park. Such areas are scarce in the city deserve the highest level of protection.

For these reasons Sussex Gardens Trust objects to the application.

Yours faithfully

Jim Stockwell

On behalf of the Sussex Gardens Trust.

CC: The Gardens Trust

## Statement of Significance for the Royal Pavilion Gardens

**Note: This Statement of Significance for the Pavilion estate was commissioned from an historic landscape consultant by the Royal Pavilion as part of the on-going development of a management plan for the Pavilion estate (originally prepared in 2009 and updated in 2015).**

3.1 The Royal Pavilion and its garden is the only surviving example of site designed as a unity in a picturesque style by John Nash and in which the original layout of paths and planting beds, as shown on the plan in Nash's *Views of the Royal Pavilion*, can be seen, through their restoration, largely as they were designed.

3.2 The garden is the only surviving example of a fully-restored picturesque, Regency period garden in England demonstrating the palette of species available up to 1825 and including the newest introductions, such as tiger lilies, available from Kew to George IV.

3.3 In its design, the garden demonstrates the application of Nash's approach to metropolitan landscape improvements previously used in Regents Park, these being based on the ideas of landscape writers of national significance such as The Reverend William Gilpin, Uvedale Price, J C Loudon and the poet William Mason. The garden also demonstrates the influence of other leading contemporary designers and scenic artists such as Humphry Repton (Nash' former business partner) S P Cockerell (the architect of Sezincote) and William Daniell whose folios of accurate drawings of Hindoo architecture and landscapes were so admired by George IV.

3.4. The role of the garden as restored is significant in re-uniting (as originally conceived) physically and visually *all* the late Georgian historic structures around it – the Stables and Riding house (Dome and corn-exchange) and the North gate.

3.5 The garden retains, with largely minor alterations, its boundaries as set after the final land purchases to complete the estate in 1826/7.

3.6 The garden is a rare demonstration of the character and development over time of picturesque, ornamental, flowery shrubberies and therefore a working example of their management techniques. It presents a unique opportunity for both amateur and professional horticultural study.

3.7. The garden has strong associations with royalty, both its original instigator George 1V who was the imaginative power behind it and later, Queen Victoria, who disposed of it to the town commissioners.

3.8 The shrubberies are a live interpretation of the written advice on laying out Georgian shrubberies of Henry Phillips, an important local horticultural writer and landscape gardener who laid out Lewes Crescent

3.9. The garden has an extensive archive of historical material, much of it newly discovered through the restoration process and now available for study. Recent new publications such as Mike Jones' 'Set for a King' have made this information readily available to the general reader and visitor, thus increasing their understanding of the garden as a heritage asset'.

3.11. The garden is the setting for the City's most internationally-recognised icon; its eastern and northern lawns form part of the London Road 'green mile' scenery and as such, with

Victoria gardens, St Peter's church land and The Level, contributes to a designed chain of historic open space of potentially high quality within the central Cityscape.

3.11 The west boundary balustrading of the garden along the east lawn is an example of the extensive early C20 improvements to the town's open spaces by the Mayor Herbert Carden and the parks superintendent BH MacLaren.

3.12 The café is an example of the occasional involvement of Brighton Art College in town activity as it was established following a design competition. It was built in 1950 in the Art Deco-style

3.13 The garden contains a rare survival of several mature elm trees, plus new species which can only be seen in Brighton today and which are testament to the City Council's high quality tree-care

3.14 The garden contains a wide range of elm varieties, significant as representing BHCC's holding of the National Collection of elms, many of which may not be seen elsewhere in public parks in England and therefore have an educational as well as arboricultural value.

3.15 The garden is the only public open space in the City centre with minimal interface with main traffic routes and therefore is highly valued for its peaceful and relatively quiet ambience.

3.16 The informal 'mixed and mingled' character of the planting and its all-season interest (berries, flowers, fruits etc.) lends the garden to developing a range of interesting and valuable wildlife habitats especially for an inner-city location.

3.17 The garden is of very high community value as a meeting place and for a great range of cultural activities.

3.18 The garden volunteers are highly valued for their physical care of the site and their contribution to public information and to being a 'benign influence' on behaviour when working on site.

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