



47 Denmans Lane
Lindfield
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West Sussex
RH16 2JN

FAO: Louise Kent
SDNPA

Submitted by e-mail

1st November 2019

Dear Madam,

New access track from Fernden Lane for commercial vehicle use. Blackdown Park Fernden Lane Lurgashall West Sussex. SDNP/19/02792/FUL

The Gardens Trust (GT) is the statutory consultee on matters concerning registered parks and gardens, and should be consulted directly on this application. However, thank you for notifying the Sussex Gardens Trust (SGT). Representatives of SGT have studied the documents submitted with the application and our comments are shown below.

The site lies within Blackdown Park which is included with a Grade II designation on the register of Historic Parks and Gardens maintained by Historic England; as such the applicant is required to describe the significance of Blackdown Park (NPPF, para 189) and assess whether the proposals will result in harm to that significance. At paragraph 7.6 of the Planning Statement, the application concludes that *"The effect of the development on the significance of the heritage asset is, therefore, considered to be neutral, if not slightly enhancing"*.

SGT agrees that burying the overhead power cables would enhance the significance of the park. This part of the application is welcomed.

However, SGT considers the construction a new paved track across the park would have an adverse effect on its significance. By introducing additional hard landscaping, the new track would have a harmful effect on views from the nearby footpaths across this part of the parkland and on glimpsed views from Fernden Lane across the meadow to the vale below.

SGT does not find the assessment of benefits convincing. The main argument put forward for a new access road is a safety case related to commercial vehicle movements. However, data included at para 3.3 of the Addendum to Planning Statement shows quantified average daily traffic movements of just 6 vehicles per day. Movements connected to the two vineyards and building contractors would be additional to these, but they are not quantified at all (see below).

Vehicles using new access track (derived from para 3.3 of the Addendum to Planning Statement)		
	Per week	Notes
Supermarket delivery vans	1	
DPD/TNT vans	7	
Royal Mail	6	
Bin lorries	2	
Farm traffic for 2 vineyards		not quantified
Labourers	10	
Building contractors		not quantified, but planned to reduce over time
Garden maintenance vehicle:	15	
Gas/fuel deliveries	1	
Total per week	42	
Av Per day	6	

The Planning Statement explains that parts of the existing track are in a poor state of repair but the simple alternative of repairing this track does not appear to have been considered.

Conclusion

SGT welcomes proposals to bury the power lines. However, the new track would cause visual harm to significance of the heritage asset; moreover, the very low levels of traffic movements quantified in the application documents do not provide an adequate justification. The simple alternative of repairing the existing track would probably provide similar benefits without causing harm. For these reasons SGT objects to the application being approved in its present form.

Yours faithfully

Jim Stockwell

On behalf of the Sussex Gardens Trust.
CC: The Gardens Trust