



47 Denmans Lane  
Lindfield,  
Haywards Heath  
West Sussex  
RH16 2JN

To: Brighton and Hove City Council  
***Submitted via e-mail***

29<sup>th</sup> October 2020

Dear Sir,

### **Brighton & Hove City Council's City Plan Part 2**

Thank you for consulting the Sussex Gardens Trust (SGT) and also the Gardens Trust (GT) about the above Plan. The Gardens Trust is the statutory consultee on matters concerning registered parks and gardens, and is now working closely with County Garden Trusts such as SGT regarding commenting on planning policy and planning applications.

The policies of interest to the Sussex Gardens Trust comprise the following Development Management Policies:

- DM28** - Local Heritage Assets,
- DM29** - the setting of heritage assets ,
- DM30** - historic parks and gardens, and
- DM32** - the Royal Pavilion Estate.

#### **Comments**

**DM28 Locally Listed Heritage Assets.** The Trust welcomes this policy. It is considered to give appropriate protection to possible future additions to the national register of historic parks and gardens.

**DM29 The Setting of Heritage Assets.** The Trust would welcome the addition of 'height' to the development features listed.in the first paragraph ie alongside siting, footprint, density, scale etc.

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*The Sussex Gardens Trust is a member of The Gardens Trust  
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It has often been found to be the height of nearby developments that has had the greatest visual impact on garden settings. This is therefore considered a perverse omission.

The Trust considers the wording of the last paragraph an oversimplification, and objects to the way the policy seeks to prioritise heritage assets solely according to significance. If there is to be any prioritising, it should follow an assessment of both significance and impact, both positive and negative.

**DM30 Registered Parks and Gardens.** The Trust would encourage changes in the wording of this policy for reasons of clarity. It recommends the second sentence be altered to begin ' In assessing the significance of the site and the impact of the development on the site's historic sense of place, it will also have regard to ....'

The Trust does not believe that the second paragraph has a place within this policy. Such ' temporary' uses have a tendency to gain permanence and become the norm rather than the exception.

**DM32 The Royal Pavilion Estate.** The Trust welcomes positive proactive action to manage the Royal Pavilion Estate, and recognises the challenges and pressures placed upon it. That said, the Trust considers this policy overly prescriptive with insufficient weight given to the sensitivity and significance of the existing layout and restoration work completed in the late 20th C. The garden's historic interest is in part its use as a promenading garden, as a place for reflection and quiet enjoyment, and not for ever more intensive use(s). But that does not read loud and clear in the way this policy is worded.

## **Conclusion**

For the above reasons the Trust has strong reservations over the way heritage policies DM29, 30 and 32 are worded; wording that dilutes their value as heritage planning policies. This the Trust finds unfortunate and asks that adjustments be made accordingly.

Yours faithfully

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