

**RHS WISLEY**

**M25 JUNCTION 10/A3  
WISLEY INTERCHANGE  
IMPROVEMENT SCHEME**

**EXPERT REPORT – CULTURAL HERITAGE**

**JULY 2020**



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# 1.0 SUMMARY OF EVIDENCE

- 1.1 My name is Dr Chris Miele. I am a chartered town planner and member of the Institute of Historic Building Conservation. I have advanced qualifications in cultural history (MA and PhD) and a record of academic publications and memberships attesting to my accomplishments in this field.
- 1.2 I have been advising on development and the historic environment for thirty years, first as an officer at Historic England (1990-98) and since then in private practice. I am a senior partner at Montagu Evans LLP, a property consultancy based in central London. I work in the planning department where I head a large team of professionals who specialise in development and sensitive land, including listed buildings and historic landscapes.
- 1.3 I act regularly as an independent expert witness or assessor, mostly at planning inquiries (including recovered applications and called-in appeals) but also in other jurisdictions: Upper House of the Tribunal (Lands Chamber), QB Division of the High Court (Construction and Technology), and Consistory Court. My evidence has been prepared to the standard and under the terms required of an independent expert advising a tribunal or court (see my Section 11.0 comprising my signed affirmation to this effect).
- 1.4 I was contacted by the RHS to review certain documents relating to its formal objection to the DCO Scheme. I attended a meeting with the RHS and its advisors to discuss the same and on that basis, I accepted the financial impact analysis and further RHS analysis arising from it, I made an offer of expert witness services under the required terms.
- 1.5 My firm has been advising the RHS on various planning matters, as explained in my section 3.
- 1.6 My evidence concludes the following.
- 1.7 The RHS' Garden at Wisley is a heritage asset of considerable importance, as reflected in its II\* designation as a registered park and garden. It is internationally renowned. It is the flagship garden of 120 years standing and was registered as part of the first swathe of park and garden designations in 1984.
- 1.8 Its particular interest, and reason for such a high grading, lies as much in its formal design and plant collection, as the purpose it serves, promoting the science, art and practice of horticulture. As such its cultural value is a living legacy, sustained through no central government grant or funding.
- 1.9 Wisley has particular significance as a place of scientific endeavour, an active laboratory of horticulture which has long been the case since its founding. Fergusson Wilson's intention was to create 'an experimental garden, in which the best possibilities were sought for the treatment of plants in a British environment.' The dominant presence of The Laboratory embodies the importance of these activities at Wisley.
- 1.10 The RHS at Wisley has just completed a very ambitious development programme, some £72.4 million in capital expenditure that is devoted to enhancing the Membership, the visitor experience, the scientific work of the Society and, importantly, communicating that to everyone who visits the gardens and more widely so that they can learn of the work done at Wisley.
- 1.11 The funding of this programme is, as will be explained (and is elsewhere in the Society's submissions), sensitive to any reduction in visitor numbers. The Society's presented evidence documents that the DCO proposals will affect visitor numbers during the construction and operational phases, reducing income and so putting the Society's operational and cultural activities at risk. The compounding effect of the COVID lock down raises that threat, I understand, to a potentially existential level, and for reasons similar to those which are threatening the continued viability of other cultural activities and institutions in our country.
- 1.12 For the purposes of my evidence I accept that the RHS' evidence on financial impact is correct. That evidence lies outwith my expertise.
- 1.13 In my judgment, this would mean that the cultural legacy of the Society (which is an integral part of its significance, and the significance of the designated asset) would be harmed by the proposals.

- 1.14 Since the harm is to the delivery of RHS programmes and activities outwith my specialist area, it is not right for me to calibrate the harm precisely particularly as there is a significant risk element in play. What I can report with confidence is that the proposals would cause harm to the designated asset and that this harm could be severe or serious. Some of that harm arises from the financial impacts of the scheme and the resultant reduced ability of the RHS to carry out maintenance of the fabric of the garden, the perpetuation of the collection and its standards of science and education.
- 1.15 My analysis also considers how the physical change to the approach to the Garden – the new access arrangements including the new road replacing Wisley Lane – harms the visitor experience of the asset.
- 1.16 I arrive at these conclusions by applying the established approach to the assessment of impacts on designated assets, and which is recognised in the NPS and supporting guidance.
- 1.17 First one must define the particular significance of the asset, including the contribution its setting may make to this significance or its appreciation. Significance is defined in relation to the architectural, historic, evidential or artistic value of an asset. These are broad categories, and there is guidance in place from Historic England (GPA2 and Conservation Principles) that assist in defining why a place is special. Other guidance is of assistance, but I have not relied on it heavily and only quote or reference where necessary.
- 1.18 Secondly it is well established that changes to the setting of a heritage asset can cause harm not just through changes that are visual or which alter the character of the land. Policy and guidance says that changes to setting which affect the economic viability of an asset need to be taken into account in considering whether a proposal harms its significance.
- 1.19 Such harm can occur where the viability of an asset is affected, compromising its owner's ability to conserve it properly and in line with its special interest. Measures must be put in place to try and reduce that harm through mitigation.
- 1.20 Thirdly, in cases where harm is established, such harm must be given great weight in the exercise of planning judgment in the decision-making process.
- 1.21 Fourthly, and notwithstanding that, such harm can be acceptable if there is a clear and convincing justification for it. This does not impose a freestanding test; rather such a justification is made out on balance of benefits.
- 1.22 The NPS requires the testing of alternatives, and for the final decision to be taken mindful of all relevant effects, positive and negative. The RHS have put forward an alternative.
- 1.23 I note here, and looking forward to my evidence, that the Environmental Statement undertaken for this project does not identify any impacts on economic viability and that, as a consequence, the consideration of alternatives does not take those into account either. In fact, it is only the RHS which has put forward evidence of financial impact.
- 1.24 I conclude this report by considering Historic England's involvement in the consultation process. Historic England raised points similar to those now raised by RHS, requesting information regarding the financial impact of the DCO Scheme and expressing the potential for heritage harm as a consequence of loss of income.
- 1.25 For reasons not explained in the Statement of Common Ground, this information was never provided to HE and the matter was not pursued further. I consider this a significant oversight.
- 1.26 I welcome questions on my assessment of the effect on significance resulting from the financial impact of the DCO Scheme from the ExA.

## 2.0 INTRODUCTION TO AUTHOR

2.1 My name is Dr Chris Miele and I am a Senior Partner at Montagu Evans' central London Office. I am a Chartered Town Planner (MRTPI since 2002) and a Member of the Institute of Historic Building Conservation (IHBC since 2001). I have more than twenty-seven years' professional experience as a specialist in heritage matters and also hold advanced academic qualifications in history.

### **Our Practice**

2.2 Montagu Evans is a leading firm of property advisors, established in 1921. My partners and I employ more than 300 staff. Most are based in our West End head office. We provide all areas of development surveying consultancy, from rating and valuation to management and investment advice. The town planning consultancy has always been central to our business, and it is provided through our Planning Department.

2.3 As a partner in the Planning and Development department I provide specialist advice on sites that involve development of sensitive land. I head a team of 16 experts who work on heritage-based projects within a larger planning team of 70. We also specialise in townscape and visual impact work.

### **Professional Background: Some Current Projects and Clients**

2.4 I am a professionally-trained historian of architecture and urban planning, with a specialism in British matters from the early Modern to Modern periods. Before settling in the United Kingdom, and whilst completing my masters and doctoral work, I held several academic and museum appointments at Columbia University, New York University and the Metropolitan Museum of Art and Museum of Modern Art, all in New York.

2.5 I achieved RTPI chartered status in 2002 on the basis of experience and specialist knowledge. About a third of my instructions are general planning instructions where heritage is a major consideration (for example, the British Museum extension for which I achieved all consents and the new School of Government at Oxford, both Sterling Prize nominees). The rest are specialist instructions similar to this one.

2.6 I hold an Honours Degree (BA) in the History of Architecture and Urban Planning from Columbia College, Columbia University and post-graduate degrees – an MA and a PhD – in this subject area from the Graduate School of Arts and Sciences, New York University. I latterly studied town and country planning at South Bank University.

2.7 My area of academic specialism is British, C18 and C19, and I have published extensively in these topic areas: I have studied historic landscapes in that context, and advised on them, but have not published on them. In recognition of my academic record of publications I have been elected a Fellow of the Royal Historical Society and of the Society of Antiquaries, London.

2.8 I maintain my academic credentials through publishing and lecturing, and I am an Honorary Professor in the Social Sciences Faculty at Glasgow University, and Chair of the Board of the Centre for Urban History at Leicester University.

2.9 I joined Montagu Evans as partner in 2005. Formerly I was Senior Planning Director at RPS Planning (central London office), and before that, from 1998 to 2003, a Director at Alan Baxter & Associates, a multidisciplinary consultancy based in engineering. From 1991 to 1998 I was employed by English Heritage, as it then was, providing advice in support of its statutory function as a listing inspector.

2.10 Over the years I have gained considerable experience in the analysis of historic landscapes of all kinds, from those featuring archaeological and medieval remains, to more traditional parklands which very often have a horticultural dimension. The sites include registered parks and gardens of the highest grade, for example, Studley Royal Park and the Royal Botanic Gardens at Kew, which are also World Heritage Sites. I have advised on a number of garden and parkland restoration projects as part of that work.

2.11 I act regularly as an independent expert witness on planning appeals and call-in inquiries as well as before the Upper Tribunal (Lands Chamber), Construction and Technology Court and Consistory Court. I am aware of the duties of expert planning witnesses under the Civil Procedure Rules as a matter of general practice in this area of professional work and adhere to them as I do to the terms of the RTPI Code of Professional Conduct, edition 10 February 2016. I also confirm my evidence is prepared in accordance with the PINS 2019 procedural guidance on planning appeals, Annexe O, *What is expert evidence?*

# 3.0 INVOLVEMENT WITH THE CASE AND SCOPE OF EXPERT REPORT

## Involvement with the DCO Case

- 3.1 My firm was approached by the RHS in January 2020 to review the plans and the evidence put forward by Highways England for the alterations to the junction 10 on the M25 in May 2020. I was asked also to review the evidence prepared thus far by the RHS in their support of an alternative scheme, and the socio-economic and related financial impacts the DCO Scheme would have.
- 3.2 I was invited in the first instance to review the papers and to ascertain whether I could act in the present capacity and on what basis. Having confirmed my views, and that I was comfortable acting in this matter as an expert, I then made an offer of service. I was already familiar with the site, albeit from two visits made before the current project.
- 3.3 Montagu Evans has been providing planning and heritage advice to the RHS on its Wisley site since 2014 before the RHS made a commitment to its Strategic Investment Programme on the site. This led to the planning applications for the significant developments for new entrance facilities and garden pavilion as part of the visitor experience and understanding.
- 3.4 It is my colleagues who have previously provided this advice to the RHS at the site in Wisley, although I gave advice separately to the RHS on a development project involving the refurbishment and extension of its London HQ, a listed building in Vincent Square Westminster
- 3.5 I am an individual member of the RHS (joined 2019).

## Issues Addressed in Evidence

- 3.6 My evidence will consider the heritage consequences of the proposal's socio- economic and financial impact. That is, the effect of the proposals on the significance of the RHS Gardens at Wisley as a result of the financial impact on the function of the Gardens as a visitor attraction and educational facility, which builds on the work completed by Hatch Regeneris.
- 3.7 First I will set out my own assessment of the significance of the RHS Gardens and associated buildings, drawing on the work my team have completed in the past on the research and significance of the asset, enhancing this where necessary for this particular exercise. In carrying this out I have drawn upon the expertise of and consulted with my Partner, Roger Bowdler, former Head of Listing at Historic England.
- 3.8 My evidence therefore depends on the RHS' analysis, notably the following documents (I have included the cross reference to inquiry documents as follows):
- Written Representation by Jon Bunney (REP1-039)
  - Motion Transport Assessment 2016 and associated appendices (REP2-040, REP2-041, REP2-042);
  - RHS Wisley: Economic Impact Study 2015/16 - 2024/25, Counterculture (REP3-052);
  - Further representations of Jon Bunney of Hatch Regeneris on economic impact (REP8- 054);
  - Response to ExQ2 (REP5-054);
  - Additional Written Representation (REP6-024).
- 3.9 I consider also the physical impacts of the works to the Garden, including the affects on 44 trees along its boundary with the A3 as identified by the arboricultural advisor to the RHS.
- 3.10 I consider additionally the impact on the arrival experience of the visitor.
- 3.11 Drawing these issues together I consider the approach that is advised in policy and guidance on the assessment of setting and the economic vitality of the asset. Part one of HE's Setting guidance (GPA 3) considers setting and views, and

specifically calls for the examination of whether a proposed development may cause damage to a heritage asset's "economic viability now, or in the future, thereby threatening its on-going conservation":

- 3.12 The guidance develops this point further on page 6 of that document, making specific reference to road schemes in their potential to affect the economic viability of heritage assets. I quote: *'However, the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect.'*
- 3.13 Overall, I come to a conclusion on the consequential impact and harmful effects on conservation of significance of the grade II\* registered park and garden at RHS Wisley.
- 3.14 I review also the adequacy of the ES assessment on this point. I have analysed the heritage, landscape and visual, and the chapter on people and communities.
- 3.15 To conclude this report I look at Historic England's position to date and comment on their advice to the DCO process.
- 3.16 On behalf of the RHS, I request the ExA takes note of my evidence and asks questions, if there are any, for further clarification and explanation.

# 4.0 STATUTORY PROVISION & POLICY

4.1 In this section I identify those parts of the National Policy Statement and guidance of particular relevance to my evidence.

## Alternatives

4.2 I note paragraph 4.26 on alternatives. I cite this with reference to my Section 8, in which I comment on the submitted cultural heritage chapter of the ES supporting the DCO. This does not consider the harm that the financial impact would cause to the significance of the gardens as a heritage asset. I consider this to be an omission.

## Historic Environment Policy

4.3 An RPG designation is not statutory; however, the same policy considerations apply to it as to statutorily designated assets through the operation of the NPS.

4.4 A general principle underlying the operation of the historic environment is the definition of significance through the provision of an appropriate level of information. One cannot understand the effect of any impact without that understanding. That point ramifies through the NPS and best practice.

4.5 I make it here with reference to section 5 of this evidence, which comprises a statement of significance of the asset, and with reference to section 8 (again), which comments on the adequacy of the ES assessment. In short, and foreshadowing those points, I think that the ES's assessment of significance does not accurately reflect the degree to which the significance of this highly graded RPG is embodied in its use, furthering the purposes of the Society. And the continuity of that purpose is an attribute of historic significance.

4.6 The NPS advises (5.122) the historic environment holds '*value to this and future generations because of their historic, archaeological, architectural or artistic interest*'.

4.7 The NPS recognises (also 5.122) that significance derives '*not only from a heritage asset's physical presence, but also from its setting*'.

4.8 The accompanying footnote to the policy defines setting as '*the surroundings in which [a heritage asset] is experienced*', adding: '*its extent is not fixed and may change as the asset and its surroundings evolve. Elements of setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*'.

4.9 The point made in the latter citation is, that on the facts of any case, the evolution of setting, for example, through its development, can change the contribution of setting to significance or the appreciation of that significance. The latter term, 'appreciation', refers to the experience of an individual and is not limited to visual experience.

4.10 The ES accepts that the DCO scheme is in the setting of the II\* RPG, notwithstanding the fact that there is currently, and will continue to be, no intervisibility between them as a consequence of land form and screening. The road traffic at present affects the setting of the garden noticeably and is quite intrusive in those parts right beside it. I understand the proposals would seek to mitigate noise impact by special surfacing. I do not know whether acoustic fencing is proposed to be provided in certain places, but I note here in passing that this is highly desirable.

4.11 Paragraph 5.129 states that the understanding of significance and the intergenerational value of designated assets 'should be used to avoid or minimise conflict between their conservation and any aspect of the proposal'. This reflects the general advice on alternatives, cited above.

4.12 Paragraph 5.131 advises that the SoS should 'give great weight' to a designated heritage asset's conservation. I identify what this means for decision taking in my discussion of the PPS5 Planning Practice Guide (below). This paragraph notes that the 'more important the asset, the greater the weight [accorded to conservation] should be'.

- 4.13 It is worth here noting that 'conservation' is not defined in the NPS.
- 4.14 It is defined in the National Planning Policy Framework as:
- 'The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.'* See also PPS5 below.
- 4.15 Paragraph 5.132 to 5.134 treats the determination of DCOs for proposals causing harm to a designated heritage asset.
- 4.16 5.133 treats cases of substantial harm, which can only exceptionally be justified on the basis of equally weighty countervailing benefits. Substantial harm is a very high test, and the courts have defined it in relation to the listed building regime as comprising either the total removal of significance or the near total removal of it, such the significance of an asset is very reduced. Such harm would, in my opinion, effectively remove the rationale for designation. The case is known as 'Bedford'.<sup>1</sup>
- 4.17 I have advised on substantial harm cases, notably on the demolition of listed buildings, and so am familiar with the concept.
- 4.18 5.134 treats cases of less than substantial harm, which harm is accepted by practitioners to comprise a range from limited or low to high. This categorisation is recognised in the PPG and not the NPS or PPS5 (see below).
- 4.19 Such harm may be justified on the balance of planning benefits, on a proportional basis. It is axiomatic that less than substantial harm does not equate to a less than substantial objection.
- 4.20 In the worst case, I understand the Society's analysis of the DCO Scheme to demonstrate a severe risk to the viability of the Garden. Accepting that evidence, then the degree of harm would be very high, and possibly substantial. Since the financial impact the Society identifies lies outside my expertise, I cannot give evidence on where in the broad scale, from limited less than substantial harm to substantial harm lies, those impacts lie. It is certainly significant and potentially serious to the Society's objectives, the delivery of which are intimately connected with the garden.
- 4.21 The NPS paraphrases the statutory duty<sup>2</sup> at 5.130, where it states that the SoS should 'take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, including in that objective 'the contribution of their settings and the positive contribution that their [settings] can make to sustainable communities – including their economic vitality'. In relation to the listed building regime – consequent on the Planning (LBCA) Act 1990, the courts have held that any harm to a listed building is weighted harm, and as a matter of policy that approach applies to other designated assets.
- 4.22 This is the sole reference to the economic role of the historic environment; it is implicit in the NPS, and consistent with its objectives (and the whole direction and purpose of statutory provision and national policy on the historic environment more generally), that a development having an impact on the economic viability of a heritage, leading to harm to its special interest, is a material consideration in the determination of this form of application. I say this because such an impact must be capable of being a material planning consideration. Just as the economic benefits of a proposal carry weight, so too will the economic disbenefits.
- 4.23 I understand, on the advice of my client the RHS, that the garden does not cover its cost and the deficit is covered by other RHS activities even economically, and therefore any reduction in visitors or spend will:
- Reduce its viability and ability to maintain itself; and
  - Prevent growth of its activities, and therefore its purpose.

#### **PPS5 and Successor Documents**

- 4.24 Footnote 100 of the NPS cites supporting historic environment guidance, PPS5, 'Planning for the Historic Environment...', or, it adds parenthetically, 'any successor document'.

<sup>1</sup> Bedford BC v SSCLG [2013] EWHC 2847 (Admin)

<sup>2</sup> Sections 16 (2), 66 (1) and 72 (1) of the Planning (LBCA) Act 1990.

- 4.25 Paragraph 85, expanding in policy HE9.1, identifies ‘a presumption in favour of the conservation of designated assets’.
- 4.26 The idea of a presumption for conservation, and therefore against harm (the logical corollary), was confirmed by the courts in the Forge Field decision.<sup>3</sup>
- 4.27 Such a presumption is rebuttable on the balance of benefits, taking the degree of harm – less than substantial or substantial – into account.
- 4.28 Paragraph 120 expressly treats the impact of development in the setting of an asset on its viability:
- 4.29 When assessing any application for development within the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change and the fact that developments that materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.
- 4.30 Paragraph 148, in the technical notes section, makes a general point about all conservation:

*Good conservation of heritage assets is founded on appropriate routine management and maintenance. Such an approach will minimise the need for larger repairs or other interventions and will usually represent the most economical way of sustaining an asset.*

- 4.31 From my experience advising on larger heritage assets (and Wisley is one such), I know that interruption to funding of regular maintenance is a recognised threat to the conservation of significance given a small reduction in visitor numbers will result in reduced ability to meet maintenance. That is an enduring principle. Gardens of this nature require continuous and intensive maintenance to deliver their aesthetic and practical purposes and therefore, and in my experience, are at greater risk to changes to maintenance or deferred over the short term than most historic buildings. I understand that the recent projects invested in by the RHS at Wisley have increased the footprint and quality of buildings on the site and that the cost of long-term maintenance will grow as a result, therefore putting pressure on the requirement for income to be realised through visitor numbers.
- 4.32 The successor document to PPS5 that treats setting is Historic England’s GPA3, on The Setting of Heritage Assets. This was recently revised (2019) but the document in substantially similar form has been available since October 2012. It is the industry standard and relied on in planning appeals and other tribunals.
- 4.33 It contains advice on page 6 about setting and economic viability.

#### **The Setting Guidance (GPA3) and Economic Viability**

- 4.34 The HE guidance is clear that new development within the setting of a heritage asset can affect the economic viability of the asset by improving or restricting the ability to access and appreciate the asset which would otherwise result in income generation. I include the whole paragraph for reference as follows:

*‘Sustainable development under the NPPF can have important positive impacts on heritage assets and their settings, for example by bringing an abandoned building back into use or giving a heritage asset further life. However, the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public’s ability or inclination to visit and/or use it, thereby boosting its economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect.’*

- 4.35 The Society’s case falls within the ambit of this guidance. Just as setting development may increase viability, enhancing an asset, it logically follows that it may have the opposite effect.

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<sup>3</sup> *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895

4.36 This is not a new point. The precursor to PPS5, PPG15, made a point in similar terms albeit in relation to the setting of listed buildings, at 2.16, for example:

*... the economic viability as well as the character of historic buildings may suffer and they can be robbed of much of their interest, and of the contribution they make to townscape or the countryside, if they become isolated from their surroundings, e.g. by new traffic routes, car parks, or other development.*

4.37 Section 5 in that document deals with 'Transport and Traffic Management' makes a point similar to that cited in 2.6 above. Paragraph 5.2 in that section advises that major new infrastructure development can have 'an especially wide-ranging impact on the historic environment, not just visually and physically, but indirectly, for example, by altering patterns of movement or commerce...'

4.38 Any expert in this topic area knows that funding is essential to sustain all the elements of our historic environment. It is common sense and mirrored in policy, guidance and general practice. In this respect, I note that Historic England raised this very concern in its initial consultation responses on the DCO (see my section 9).

4.39 Accordingly, and drawing this point to a close, I consider it is only best practice at least to consider the effect of a proposal on the economic sustainability of any environmental asset I am engaged with advising on. As a matter of fact the Cultural Heritage chapter in the submitted ES does not carry out this assessment, and neither can I find evidenced analysis of this matter in the landscape and community chapters. I find this to be an omission in the evidence.

#### **Other Guidance: Conservation Principles (English Heritage 2008)**

4.40 This statement comprises a statement of principles from English Heritage, as Historic England was. This document is cited at paragraph 19 of PPS5. It predates the NPS, and so does not contain the balancing provisions therein; however, it has some weight as a statement explain how EH/HE approaches applications, inviting others, including decision makers, to adopt this approach.

4.41 Conservation Principles identifies four categories of heritage value, which are different to those used in national guidance. These are aesthetic, historical, evidential and communal. The first three correspond to the values identified in guidance.

4.42 The fourth, 'communal', is not formally recognised in national policy. It derives ultimately from international conservation practice, and in particular to the European Landscape Convention.

4.43 The one I highlight for my purposes is 'communal value', which is one of the themes that emerges from my analysis of the significance of the RPG.

4.44 I reproduce apposite extracts at my Appendix 2.

4.45 This value refers to the social role of places and the consequent attachment communities have for them. This aspect of cultural value has an historical dimension where sites, such as the Garden, derive their cultural value in part from their social function. The best examples of this area places of worship and museums or other collections, such as the Garden where these represent the science and community of gardeners and horticultural trade which as of 2017 totalled 27million gardeners in the UK. The Gardens at Wisley, in my view, have particular interest as they are also a nationally registered collection (see my Section 5).

#### **Guidance on the Registration of Historic Parks and Gardens**

4.46 Here I note only that the Gardens are registered at grade II\*. The grading system of RPGs mirrors that of listed buildings, and like them grades II\* and I are reserved for assets of the highest significance in a national context. Historic England's website records that there are c. 1,600 RPGs in England. I understand that some 6% or so are registered I or II\*.

4.47 The special characteristics of RPGs are treated in Historic England's series of Selection Guides.

4.48 The relevant one for the RHS Wisley site is 'Rural Landscapes', see Appendix 3. This includes country house landscapes/parkland which have a horticultural dimension.

- 4.49 The selection guide cites Wisley expressly, which it notes is unusual nationally for being a landscape planned for this purpose, albeit also having design interest as a 'collection of different planting areas designed to take advantage of the terrain and soil conditions'. On that basis, the guide classifies its design as a rejection of earlier Victorian formal layouts which were thought to have been less sensitive to the particularities of climate, topography and soil conditions. The period of its layout is 1878 to 1902, one generally accepted to mark a shift in taste, including the move to naturalism sometimes linked to the Arts and Crafts Movement and the interest also in experimentation and research; gardens as a tool for demonstrating the Science, Art and Practice. See my Section 5 for a fuller discussion.
- 4.50 The guidance explains, at page 22, 3.6, that 'where a plant collection is of interest for purely scientific or botanical reasons, it will not be registerable. Responsibility for the national collection of plants rests with the Royal Botanic Gardens, Kew and elsewhere'.
- 4.51 So, it is the design interest of Wisley with its historical associations that support the registration. The high grading, in my opinion, derives from the collection and its dynamic nature. Earlier in the just cited paragraph, headed 'Planting and the Register', the guidance notes:

*For many people, the mention of the word garden conjures up a vision of floral beauties or culinary possibilities. However, the Register is concerned with the more structural design elements in the landscape such as landform, built structures, walks and rides, water features, structural shrubberies, arboreta, hedges and trees, and not the more ephemeral, shorter-lived plantings of herbaceous perennials, annuals, roses, and most shrubs. However, where historic planting schemes or plant collections survive, these will probably add interest to the site; a particularly fine scheme might contribute towards a high grade.*

- 4.52 In other words, the Register exists to recognise and protect historic designed landscapes, not strictly botanical ones; however, where a botanical landscape has sufficient design interest it will be registered, and that is the case with Wisley. Furthermore, the high grading of Wisley derives in part at least from the plant collections. In my judgment, the registration would not have been at such a high grade unless the gardens were fully utilised. In other words, if the site was no longer functioning as intended or functioning on a much reduced scale, then there would likely have been no starred grading.

### **Summary on Policy and Guidance**

- 4.53 In summary, then:
- The definition of an asset's significance is the starting point for an analysis. Setting may embody that significance, may detract from it or be neutral;
  - Changes to setting can of course create a setting relationship, and an impact which can be physical or economic, even social;
  - There is a positive requirement to take account of the impacts of DCO proposals on the historic environment in the weighing up of alternatives;
  - Great weight must be given to harm to a designated asset, and there is a presumption in favour of its conservation (which is the management of change to sustain or enhance significance);
  - Such impacts must be categorised as causing substantial or less than substantial harm, and in this case the assessment of those impacts falls to the Society and Mr Bunney advising on socio-economic matters and the financial impacts of the DCO Scheme; and
  - In assessing the impact, the decision maker needs to bear the relative importance of the asset into account, the more important the asset the greater weight to be accorded to the impact (having regard of course to the particular nature of the impact, and on which aspect of significance).

# 5.0 THE SIGNIFICANCE OF THE RHS GARDEN AT WISLEY

## Purpose

- 5.1 RHS Wisley is an important site on many levels. This section of the report sets out reasons why, in heritage terms, this is so and so to set the scene for the impact analysis to follow.
- 5.2 The purpose of this part of the submission is to describe the heritage significance of RHS Wisley in planning terms, then.
- 5.3 As noted earlier, in the discussion of policy and guidance, setting can derive from particular intrinsic values but also from its setting.
- 5.4 The significance of Wisley extends much further than its designed and built elements, important as they are. It is a place of experimental gardening, respected the world over. It is in the vanguard, nationally and internationally, of places which celebrate gardening. It has a high reputation as a training institution. Its importance as a place of study for cultivated biodiversity.
- 5.5 Wisley has importance also as a place to continue to inspire the nation's 27 million gardeners to continue to grow. With more than 1.2 million of UK visitors each year, there is no other garden (except the Royal Botanic Gardens at Kew, which is government funded) that is more visited, more loved, by UK residents in the world. Its significance covers the body of work, training, learning, etc. (see RHS submissions) that has taken place and is taking place at the garden through curators, gardeners, collectors and committees.
- 5.6 As a registered museum, the site possesses a plant collection of international importance, along with a library and herbarium containing parts of the wider RHS collection.
- 5.7 All these aspects have to be included if a full awareness of the site's significance is to be grasped. To consider only the built components of Wisley, significant as these elements are, is to miss out on much of its fundamental importance. What an effective statement of significance should seek to do is to link this full range of values with the tangible heritage of Wisley.

## Structure

- 5.8 This section takes much of its structure from that recommended in Historic England's guidance document *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (Historic England Advice Note 12, 2019). The overarching significance of the site, as articulated in the recent Conservation Plan prepared by Chris Blandford Associates in February 2018, is the starting point.
- 5.9 Beginning with a consideration of the designation entries for the site and entries on the Historic Environment Record, this statement then rehearses the various grounds of significance which can be ascribed to its component parts: to its setting, its lay-out and its key historic buildings.
- 5.10 The collections and activities at Wisley contribute directly to the site's importance. The Conservation Plan contains a useful 'Appendix 1 – Tables of Significance'. These extend widely across a range of values and strongly feature the importance of collections.

## Approach and Methodology

- 5.11 This statement of significance has been prepared by means of a site visit, and a limited desk-top review of available literature. This includes the Heritage Statement prepared for the RHS by Montagu Evans in 2014 as part of the planning application for new reception buildings at Wisley. As a scientific institution devoted to learning and the communication of knowledge, and one fully aware of its own history, the RHS has maintained its Lindley Library and encouraged the publication of much relevant material in outlets such as *Occasional Papers from the RHS Lindley Library*.

## Overall Statement of Significance

- 5.12 The overarching Statement of Significance produced for the 2018 Conservation Plan is cited here by way of introduction:
- 5.13 RHS Garden Wisley is a unique horticultural landscape, shaped for more than 100 years by a community of people united by their shared passion for plants. As home to the most diverse collection of cultivated varieties of plants anywhere in the world, Wisley is internationally unique and of fundamental importance to the conservation of global horticultural biodiversity. Wisley is of exceptional significance for the landscape, gardens, plants, buildings and collections that have been developed there, as it is for the practices of horticultural science, education and gardening that are pursued there, combined with a fundamental commitment to public access and its horticultural networks.
- 5.14 This statement neatly combines the natural and the man-made, the scientific and the aesthetic, the living and the inanimate. While the present statement of significance concentrates on matters within the planning realm, the full range of significance at Wisley is notable.

## Designation Records

- 5.15 **National Heritage Designations:** RHS Wisley has several different heritage designations in place: the entire site is included on the National Heritage List for England [NHLE] at Grade II\* and its largest older building, the Laboratory, is listed Grade II. The List for Guildford has not been revised for several decades, however, so other structures may be of potentially listable quality as well.
- 5.16 **A designated landscape:** the site is designated Grade II\* on the NHLE (List Entry No 1000126) which indicates that it is 'of more than special interest'. It was originally included on the Register of Parks and Gardens, a designation category for designed landscapes which came into being with the creation of English Heritage (properly, the Historic Buildings and Monuments Commission) on 1<sup>st</sup> April 1984. Wisley was among the earliest entries on the Register, being added on 1<sup>st</sup> June 1984. This is a reflection of the high degree of recognition bestowed on from an early date.
- 5.17 The grade is of high importance in terms of planning consequences. This designation level places the site in the category of highly significant heritage assets alongside Grade I and II\* buildings, scheduled monuments, protected wrecks, registered battlefields and World Heritage Sites as 'assets of the highest significance', the permitting of substantial harm to, or the loss of, in any proposal should be 'wholly exceptional' (NPPF, paragraph 194 (b)).
- 5.18 The entry has been revised since 1984: it was re-written in 1999 and amended in 2003. Unlike in recent entries on the NHLE, there are no specific 'reasons for designation' in this entry: as a result, the reasons for the site's inclusion can only be inferred from the description. Reading the entry, it is clear that the main emphasis is on the site's historical development and its contribution to species development, along with the presence of specific areas of the grounds designed by prominent figures and of specific structures including, but not confined to, the Laboratory.
- 5.19 **Listed Building: The Laboratory:** the only listed building currently at the RHS Wisley is the Laboratory (List Entry No 1189118). This is listed in Grade II, indicating it is 'of special architectural or historic interest', and was added to the List on 25 November 1985. The Entry is without the 'Reasons for Designation' found in modern listings. Reading the entry, it is evident that the building was assessed purely on architectural grounds: it is described as 'Offices. 1914 by Imrie and Angell in picturesque Vernacular style' and a verbal description of its external parts then follows, with no references at all to its history.
- 5.20 **Local Designations:** the site is not part of the Wisley Conservation Area and no locally listed buildings have been identified.
- 5.21 **References in the local Historic Environment Record:** other identified (but not designated) items on the site identified on the local historic environment record, *Exploring Surrey's Past*, include a field system dated to the Late Bronze Age and to the 1<sup>th</sup>-12<sup>th</sup> centuries on the site of the Bicentenary Glasshouse (ref SHHER\_16056) and the three war memorials at Wisley: the clock tower at the entrance to the Laboratory (ref SSHER\_20871); the First World War memorial plaque in the Headquarters Building (ref SSHER\_20867).

5.22 Second World War memorial plaque in the Headquarters Building (ref SSHER\_20868).

5.23 No other indications of archaeological potential have been identified.

### **Understanding the Heritage Assets**

#### *Setting*

5.24 Part of the significance of RHS Wisley derives from its setting. This is described in the NPPF as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.' This approach is in my experience read across to DCO applications, and on the basis of the general approach in the NPS and that in successor guidance to PPS5, which will include HE's GPA3 on setting.

5.25 RHS Wisley derives some of its significance from its rural Surrey location. Whilst not historically significant, it is important to note that the particular range of dry sandy soils with heavier clay/chalk along with the generally mild weather in this part of Britain allow a variety of plants to grow where, practically, they might not otherwise survive together. Situated outside the Surrey Hills Area of Outstanding Natural Beauty, and in close proximity to the A3, it nevertheless derives clear significance from its sloping rural site. This is in parts heavily wooded, particularly along its border with the A3, the historic London to Portsmouth road. This planting has been increased in density from the early 20<sup>th</sup> century, in large measure in response to the rise in motor traffic on the road. Much of the character of Wisley derives from its rural, formerly agricultural, location in which world-class scientific activities have been (and continue to be) conducted. The surrounding area is one with a pronounced historic character and the nearby settlement of Wisley contains many listed buildings and is a conservation area.

5.26 In terms of significance, therefore, the overall contribution of the setting is in my view moderate.

5.27 **Archaeological Interest:** the inclusion of remains of Bronze Age and medieval field systems is noted above. No Areas of High Archaeological Potential have however been designated at the site by the local authority, and considerable ground works have taken place as well. While the standing structures have the potential to benefit from archaeological assessment of their fabric, this potential is not high given the recent date of the buildings.

5.28 In terms of significance, therefore, the overall archaeological value of the site is low.

#### **Architectural and Artistic Interest and Historic Interest**

5.29 There is a direct link between the architectural and artistic interest of the buildings at Wisley, and their historic interest. While it is customary to consider these aspects separately, it makes sense here to address them alongside each other under each entry and ascribe a degree of significance to each individual asset.

5.30 The architectural and artistic interest of the site, it should be said from the outset, is considerable. This derives from the individual structures and from the various elements of the designed landscape which combine to form the Grade II\* registered landscape. These will be considered in turn. The interest of the site's component structures extends beyond those elements which are already listed: hence the key unlisted buildings are included here also.

5.31 The interest of the landscape is discussed after a survey of the Laboratory. My assessment of the other structures in the garden is set out at Appendix 4.

#### **The Laboratory**

5.32 This Grade II building is the principal historic structure at Wisley and dates from 1914-16. It is the embodiment of the RHS' scientific mission, being designed to house research facilities, a lecture theatre, students' common room and other educational purposes.

5.33 Architectural and artistic interest: as was common practice at the time, cutting edge research did not demand explicitly modern architecture. For reasons of preserving Wisley's rural atmosphere, therefore, the style chosen was the highly

popular 'Surrey style', a local variant of the Arts and Crafts which drew on the local vernacular in materials, massing and architectural motifs.

- 5.34 The competition for the building was won by the Surrey firm of Imrie and Angell, headed by George Blair Imrie (1885-1952): the practice is best known for designing the prestigious St George's Hill development near Weybridge from 1912, but designed other houses in the area too, some of which are listed. This building is a very good example of the genre, some alterations notwithstanding.
- 5.35 A useful summary of Imrie's career is found in the recent (2019) listing of West Ridge, Chipstead, Surrey (NHLE Entry No 1466683), which is instructive as to why the kind of architecture designed by Imrie, and of which The Laboratory is the most important example in his work, is now accorded greater respect than was once the case.
- 5.36 The building is imposing from several angles. It's picturesquely conceived eastern elevation is highly visible from the main entrance and the busy roofscape of sloping roofs and tall chimneystacks creates a memorable impression. Its western front forms the backdrop to the formal canal, laid out by Geoffrey Jellicoe and Lanning Roper in 1970. The prominence of the building in architectural terms is considerable, given the deliberate modesty of other early structures at Wisley.
- 5.37 Historic Interest: the Laboratory embodies the RHS' arrival at Wisley and its desire to put its scientific research on a proper footing at its new principal horticultural site. It also embodies more widely the rise of scientific research buildings at this period. There are some internal survivals which testify to its early use. The presence of war memorials to former students and staff adds further to the historic interest of the building.
- 5.38 Overall Significance: given the combined architectural/artistic and historic interest of the Laboratory, the level of significance which is warranted is **high**. The building was described as being of 'exceptional significance' in the Conservation plan as being of fundamental importance to Wisley's history, of fundamental importance to the history of the RHS as an institution, and as occupying a 'Fundamental place in the history of horticultural science and education in the UK' (Appendix I, p17).

### **Other Buildings at Wisley**

- 5.39 No other buildings at Wisley are listed. The Laboratory is undoubtedly the most historic important building on site but it is worth stating that several of the other buildings contribute to the overall significance of the site. While none are currently listed in their own right, this reflects more the age of the list coverage than any lack of special interest. They warrant inclusion in this report for that reason. A brief survey of the individual unlisted structures is therefore required if the full significance of RHS Wisley is to be understood.
- 5.40 A number of these are ascribed 'exceptional significance' in in the Conservation Plan: these include Gardiner's House, Weatherhill Cottage, The Loggia, The Pines, the former entrance courtyard and Wilks Gateway, the Weather Station and the Walled Garden. The Bicentenary Glasshouse is ranked as of 'considerable significance' as a structure but of 'exceptional significance' for its planting.
- 5.41 Other structures bestowed 'considerable significance' in the Conservation Plan include the Jellicoe Canal, and the Bowes-Lyon Pavilion. The former Plant Exhibition Store to the south of the Laboratory is regarded as of possible considerable significance too.
- 5.42 Collectively they reflect the growth of the RHS endeavour at Wisley.
- 5.43 These buildings have been assessed under different criteria than those employed in a Heritage Statement. They are therefore assessed once more using the significance headings. I have set these out in my Appendix 4.

### **Significance of the Registered Landscape**

- 5.44 The garden at Wisley was designated in 1984 and is Grade II\*. Earlier articulations of this complex landscape include the 2014 Heritage Statement and the 2018 Conservation Plan. As pointed out above, the National Heritage List for England entry does not include Reasons for Designation: these can be inferred from the description.

- 5.45 When addressing the significance of the Registered Landscape, the issue of tangible and intangible heritage comes up. They are particularly difficult to separate at a site like Wisley, where plant growth and activity lie at the core of its purpose and importance. Fortunately, the wider values of Wisley are reflected and embodied in its tangible fabric.
- 5.46 This part of the Heritage Statement begins with an overall assessment of the site, as considered against the terms set out in the NPPF. It then considers the wider values of the site.
- 5.47 **Historic Interest:** Wisley possesses historic interest of a very high order. Despite regular programmes of change and new design, the site retains clear evidence of Fergusson Wilson's pioneering work in creating an experimental garden. This is particularly in evidence in the best-surviving areas of the initial Victorian phase: the Water Garden and the Wild Garden. The Edwardian Rock Garden is also an early survival of special note, its ambitious deployment of Pulhamite worthy of special mention. A second aspect of historic interest is the presence of a noted collection of plants, beginning with the Pinetum (1909 onward), but extending to the many varieties of planting approach, from rockery to trial beds. Thirdly, the institutional history of Wisley as a reflection of the activities of a highly important organisation also contributes to the significance of the site: this is reflected throughout the site, in its buildings, garden components and overall site. Fourthly, there is the wider cultural interest of the transformation of Wisley, from technical centre of horticulture to highly popular destination: this parallels the increasing popularity of gardening in modern society.
- 5.48 Overall significance: **high**.
- 5.49 **Artistic Interest** Wisley has clear artistic interest. This is manifested in its different garden areas and in the overall layout of the site. Some of this interest derives from the design of structures and their integration into the landscape, seen most readily in Jellicoe's Canal. Further interest derives from the different garden layouts, ranging from the Edwardian Rock Garden to modern creations such as the Hobhouse Country Garden (1999). Further artistic interest derives from the use of landform and the placing of garden spaces within the landscape. Planting is a further reason to ascribe artistic interest: ranging from trees in the Pinetum to aquatic plants in the Long Pools, the grouping and siting of plants of all varieties at Wisley delivers a highly effective aesthetic effect.
- 5.50 Overall significance: **high**.
- 5.51 This Statement of Significance closes with a consideration of the wider values of Wisley. This section derives in part from the detailed Tables of Significance, attached as Appendix 1 to the 2018 Conservation Plan.
- 5.52 **Wisley: a Place of Dynamic Change:** Wisley was conceived by Fergusson Wilson as a place of experimentation and research. It continued as such after its acquisition by the RHS in 1903. The 2014 Heritage Statement articulates this well:
- 5.53 Wisley is unlike most Registered Gardens where significance is often derived from the way in which the gardens were planned. The plan for Wisley was never intended to be static and was to evolve with the role of the RHS at Wisley. This cycle of change is key to the appreciation, understanding and experience of the asset. (p.24)
- 5.54 It therefore follows that the spirit of Wisley is about development and the active pursuit of horticultural science. It has never been conceived as a single design concept, let alone as a monumental landscape. Major new structures have been successfully introduced in pursuit of this aim: most notably the 2007 Glasshouse. The new project to incorporate the National Centre for Horticultural Science and Learning and the 3 new gardens will add to the new Welcome building which itself reveals more of the Laboratory and the earlier shop building which was a harmful addition to the Laboratory. These projects will allow also the reinstatement of the former Plant Centre back to a trials garden in association with Gardiners House.
- 5.55 The current projects promoted by the RHS has removed much of the harmful later development which was not of interest and sought to enhanced what remains, adding new buildings of high quality which add to the composition and enjoyment of the gardens.
- 5.56 **Wisley: a Cumulative Landscape of Garden Design:** Wisley contains a wide range of distinct character areas, each deliberately conceived to reflect a different facet of gardening. 'In the past, key designers have been commissioned to develop individual gardens at Wisley. This has led to a "patch-work quilt" of designed landscapes within the overall framework of experimental horticulture and an exceptional living collection' (2018 Conservation Plan, p.98). The range

and variety extends from the Long Pools, laid out from the 1880s by Fergusson Wilson and carefully preserved by the RHS, to the Country Garden, planned by Penelope Hobhouse and finished in 1999; the Pinetum, begun in 1909, contrasts with the structural formality of Jellicoe's Canal, started in 1970.

5.57 **Significance of RHS Wisley as a Place of Active Study and Training:** The idea of Wisley as a training centre to nurture future horticulturalists is a core concept. This has long been the case, and is reflected in the presence of historic buildings expressly built to facilitate this: in particular, The Laboratory and the residential building called The Pines. It is also represented in the areas of trial beds.

5.58 Overall significance: **high**.

5.59 **Significance of Wisley as a Place of Biodiversity:** Wisley is recognised for its international significance as a place in which a very wide range of plants is grown (25,120 total taxa are represented here). 'The collections at Wisley are of fundamental importance for global horticultural biodiversity... With nearly 17% of all the cultivars grown at Wisley being Threatened: Endangered in cultivation, this underlines the invaluable contribution Wisley makes to global biodiversity' (2018 Conservation Plan, p.93). Along with the buildings and man-made elements, the presence of an outstanding collection of species is a key aspect of the significance of Wisley as a landscape of more than special interest. This is reflected in the heritage of planted beds, of related ancillary buildings

5.60 Significance: high.

5.61 **Significance of Wisley as a Place of Scientific Endeavour:** Wisley can be seen as an active laboratory of horticulture. This has long been the case: Fergusson Wilson's founding intention was to create 'an experimental garden, in which the best possibilities were sought for the treatment of plants in a British environment. That was its standing at the time that Sir Thomas Hanbury presented it to the Royal Horticultural Society as an experimental garden.' (Brent Elliott, 'Experimental gardening: Wisley in the nineteenth century', *Occasional Papers from the RHS Lindley Library* vol 11 (2014), p.57). And so it has continued. The dominant presence of The Laboratory embodies the importance of these activities at Wisley.

5.62 Overall significance: **high**.

### **Conclusion**

5.63 RHS Wisley is an exceptional place.

5.64 It is no exaggeration to consider it a national treasure, and one of international significance. It is also a very popular visitor attraction, with 1.25 million presently (pre-Covid number) and aspirations, informing its business planning, to grow to 1.5 million (and which growth the RHS evidences is jeopardised). That scheme would enable wider appreciation of the rich heritage significance of the site, with improved facilities to enhance enjoyment and the delivery of the Society's mission.

5.65 Its significance derives from architectural/artistic reasons as well as historic ones. As a dynamic institution, the RHS possesses an importance goes beyond the built aspects of the site. However, these, and the landscape, reflect the activities and scientific endeavours that bestow this level of importance. Its inclusion on the National Heritage List for England at Grade II\*, meaning 'of more than special interest', is a fitting reflection of this importance.

# 6.0 THE RHS CASE ON FINANCIAL IMPACT

## The RHS Vision and Strategic Investment Plan

- 6.1 The Royal Horticultural Society is a world-class organisation of its type that works to continue a long tradition, over 210 years, of horticultural research and public-benefit outputs.
- 6.2 The vision of the Society is to “enhance lives, build stronger, healthier, happier communities, and create better places to live”. The Society aims to “inspire passion and excellence in the science, art and practice of horticulture a passion in horticulture and gardening among people of all ages, cultures and backgrounds... in order to benefit the environment and the health and happiness of us all, today and in the future”.
- 6.3 In 2015 the Society announced its Strategic Investment Programme, “a landmark £160 million investment in the future of horticulture”. This was expressed through enhanced educational offerings to “safeguard horticultural skills for the future”; and investment in horticultural and gardening science “to find solutions for 21st-century social, economic and environmental challenges” (Source: Counterculture, 2017).
- 6.4 The economic and financial information referred to in Sections 6 and 7 of this paper has been provided to me by Hatch Regeneris and the RHS Wisley Programme Director, with the support of the RHS Director of Finance. The RHS base business case and visitor projections for its projects at Wisley, that underpins these statements, is set out in the Counterculture report previously submitted to the ExA (REP3-052) and the evidence of the impact of the DCO Scheme and RHS alternative scheme upon future visitor numbers during construction and operation phase which is included in the updates Hatch Regeneris analysis (REP6-024).
- 6.5 I provide the forecast of visitor numbers to 2024 in my **Appendix 6**. This is an extract from the Counterculture report submitted to the ExA (REP3-052).
- 6.6 A commitment to an investment total of £72.4m will be invested in capital improvements at RHS Garden Wisley across three Key Investment Projects (KIPs) between 2015 and 2021:
- The National Centre for Horticultural Science and Learning: the UK’s first dedicated centre of excellence in horticultural science, taxonomy and plant health. This will be combined with an educational visitor or advisory hub to provide facilities that will inspire and nurture scientists and horticulturists of the future, and increase support for home and professional gardeners;
  - A new Welcome Building and visitor experience area; and
  - A newly restored and vibrant Wisley village as accommodation for RHS apprentices and trainees, helping to return the village to a vibrant community.
- 6.7 Furthermore, the Laboratory (in the building) is now opening to the public for the first time in more than 100 years as a museum and exhibition space.
- 6.8 All of this activity at Wisley is supported and enhanced by the significant visitor numbers to the Gardens, a number that the recent capital investment seeks to grow to ensure the valuable education and research programmes that the Gardens host are sustained. In 2019 RHS Wisley reported that over 1.25 million visitors came to the gardens at Wisley, with an estimated additional 242,000 visitors per annum expected by 2024/5.
- 6.9 The RHS receives no direct public funding from central or local government. The Gardens rely heavily on the income from membership and garden visits, and the wider spend of visitors to the Gardens.
- 6.10 The report prepared by Counterculture in 2017 demonstrated that the Garden is also a major focus of economic activity, both as a visitor attractor, but additionally in through its roles in scientific research and development. It acts as a major local employer, with 420 FTE on-site and supports a major local, regional and national supply chain. Visitors to the Garden not only generate economic activity for the Garden but bring significant external spend to the wider economy.

- 6.11 Put simply, the scientific focus of the work done at the gardens, its role as a trial garden and its association with the Royal Horticultural Society necessarily requires income from visitors to sustain it. Furthermore, it sustains much beyond the garden in terms of the national horticultural trade and local enterprise.
- 6.12 I have reviewed the work carried out by Hatch Regeneris to quantify the socio-economic impacts of the DCO Scheme. I have also considered the expected Financial Impact of the DCO Scheme on the garden which is a subset of the socio-economic impact and which is the work of the RHS Finance and Operations team. I accept all of this analysis in coming to the conclusions that I have on the effect on significance.

### Hatch Regeneris– My Understanding of its Findings

- 6.13 I have reviewed the HR report of November 2019 (REP1-039), along with the subsequent responses and additional evidence provided to the inquiry over the course of 2020, notably the Additional Written Representation document (REP6-024). The case put forward by HR on behalf of the RHS relies on a number of documents and surveys completed in support of this work to assess the potential socio-economic impact and financial impact upon the function and vitality of the Gardens. These include, importantly, the forecasts set out in the Counterculture Economic Impact Report (2017), undertaken to establish the impact of £72 million capital investment at RHS Wisley on the local, regional and wider economy, and which assessed the increase in visitor numbers. HR rely also on market research conducted on visitors to RHS Wisley alongside the report prepared by Traffic Transport and Highway Consultancy (TTHC) on behalf of the RHS.
- 6.14 The report prepared by TTHC highlights a range of transport impacts associated with the DCO Scheme that will result in additional journey distances and journey times on a number of routes to access and egress the Garden. The additional mileage and journey time for visitors to the Garden, as well as the staff and volunteers who work on the site, have an associated economic cost. Given the reliance of the RHS on income from visitors to the Gardens at Wisley, it is significant that any external impacts that affects the attractiveness of visiting the Garden will have a significant impact upon the overall economic value generated.
- 6.15 Market research conducted amongst visitors to the Gardens suggest that a significant proportion are likely change their behaviour as a result of the DCO scheme. A sample of 5,025 respondents indicated that the forecast delays for those travelling from the A3 South to and from the Garden (at least 6 minutes to the Garden and 2 minutes from the Garden) could result in around 25% of these individuals reducing the frequency of their trips to the Garden during the operational phase of the scheme.
- 6.16 In addition, the market research indicated that close to 50% of 4,981 respondents indicated they would be likely to change their behaviour as a result and visit the Garden less frequently during the construction phase. The outcomes of the market research clearly demonstrate that there is likely to be a significant reduction in the overall level of trips to the Garden (i.e. the frequency) during both the construction and operational phases of the DCO Scheme.
- 6.17 Table A10 below presents the reduction in projected Annual Visits and On-site Employees that the market research outputs indicate would result from the DCO Scheme.

**Table A10: Projected Reduction in Annual Visits to the Garden, On-site Employees resulting from the DCO Scheme (Annual Visitor Numbers / On Site Employees)**

Year	Phases	Reduction in Annual Visits to Garden	Reduction in On-Site Employees
2021	Construction Phase	145,000	45
2022		150,000	45
2023		155,000	45
2024	Operational Phase	62,000 #	17
Future Years		62,000 **	17*

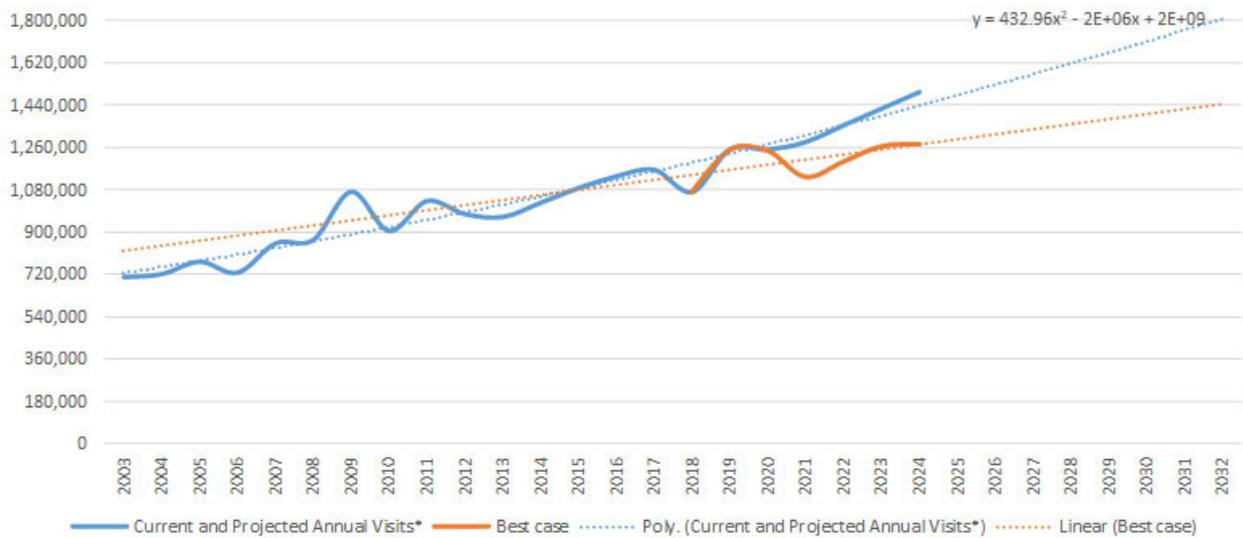
Source: Hatch Regeneris Analysis (2020)

# this number has been updated as it was reported incorrectly within REP6-024

\* as a conservative assumption no additional growth in visitor numbers and employees is assumed beyond 2024. In practice the RHS would anticipate, and are planning, for a continual period of growth through the current decade of up to 4.6% pa

- 6.18 The projected growth in visitor numbers under the RHS original projections and the forecast impact of the DCO Scheme is presented graphically below.

**Figure A1 – Trend Data for Annual Visits to the Garden and the Projected Impact under different Future Scenarios (annual visitor numbers)**



Source: Hatch Regeneris (2020)

- 6.19 The forecast travel impacts of the DCO Scheme generates an estimated overall reduction of annual visitor numbers of between 6% and 10% during the construction phase, and around 4% thereafter during the operational phase. The projected annual reduction in visitor numbers is both beyond the standard annual variations in visitor numbers that have historically arisen at the gardens and represents a continuous impact rather than a one-off annual variation. HR consider the impact of the DCO Scheme to be both severe and, more importantly, continuous. It is not a one-off 'shock' to the business. It will create a 'new normal' level of visitor attendance below the current projections.
- 6.20 The disruption to travel may also affect the duration of stay and wider spend at the site. Currently the average duration of stay may be between 3 and 4 hours, although there is a significant distribution around this average. Some durations of stay are shorter, including visits to just the plant centre and café. The RHS is forecasting that up to 1 in 10 visits to the Garden will be curtailed during the peak construction phase of the DCO Scheme and then around 1 in 25 thereafter during the operational phase. It is likely that many of the reduction in trips will be associated with visits of shorter duration, the logic flow being it making less sense to spend more time in traffic for a short trip.
- 6.21 Any reduction in visits will have a direct impact upon levels of spend at the Garden. HR have assessed the distribution of visitor trips to the Garden so that the overall impact of the DCO Scheme in increasing travel times and reducing the frequency of visits can be estimated in economic terms. I understand that higher weight is normally placed upon travel time than travel distances when making route planning decisions (borne out by DfT assessment data).
- 6.22 This is of particular concern as the construction of the DCO Scheme is scheduled to begin at the time when the RHS has planned its major launch event to mark the culmination of their £72 million investment programme. Overall, I understand that any external impacts that affects the attractiveness of visiting the Garden will have a significant impact upon the overall economic value generated. This is illustrated in the table below.

**Table A13 Summary of the Overall Estimated Economic Cost of the DCO Scheme in relation to the Garden (PV £m, 2020 prices)**

Impact	Present Value of Economic Costs (£m) (2020 prices)		
	Construction Phase (3 years)		Operational Phase
	Low	High	+ 60 years
Visitors to Garden	1.6	2.39	21.4
Employees on-site at Garden	0.28	0.43	3.5
Volunteers on-site at Garden	0.06	0.08	0.9
<b>Total Transport User Impact</b>	<b>1.9</b>	<b>2.9</b>	<b>25.9</b>
	Construction Phase (3 years)		Operational Phase
	Low	High	+ 10 years
	Salaries Expenditure	4.7	8.0
Operational Expenditure	6.9	11.9	13.4

External Spend		4.5	7.8	8.7
<b>Total Wider Economic Impacts</b>		<b>16.1</b>	<b>27.7</b>	<b>30.8</b>

Source: Hatch Regeneris (2020)

- 6.23 It is clear that there will be a significant impact upon the number of, and economic value generated by, visitors to the Garden, as well as those who work and volunteer at the Gardens. The initial construction phase will coincide with the culmination of the flagship investment programme and expansion at the Garden. This represents a critical period for the RHS to maximising the attractiveness of the Garden and establish a positive trajectory for ensuring returns on the investment made. The loss in visitors during this period will be extremely detrimental, representing a significant financial setback, and putting at risk the longer-term financial position for the Garden.
- 6.24 The RHS has not previously described in financial terms the direct financial impact of the forecast loss in visitors and spend upon the Garden accounts alone, but now does so to clarify the context of the Socio Economic representations. Accounting data for the Garden from 2019/20 demonstrates that the average visit to the Garden, including the RHS café and Shop generated an income for the RHS of around £8.26 per visit. The Garden at Wisley currently makes an accounting loss (I am advised), even prior to the effects of COVID-19; however, the opening of the new facilities in 2021 will increase income streams and this is forecast to increase average income per visitor to £10.15 by 2033. On the basis of the HR projected reduction in visitor numbers, presented in Table A10, a direct loss in RHS income is forecast of between £2.6 million and £4.4 million during the construction period alone, with a further £7.1 million during the subsequent 10-year operational phase. The RHS would clearly need to manage its variable operating costs in such circumstances but it is still forecast that this would result in a total loss of operating surplus of between £4.8m and £5.8 million up to 2033.
- 6.25 I think it relevant also that the RHS have considered an Alternative Scheme which would reduce the negative wider economic impacts, as well as financial impact, of the DCO Scheme. Whilst not removing the risk entirely, the wider economic impacts are forecast to fall by around £30m over a 10-year operational phase and, in HR's view, generate positive direct transport user benefits for visitors, workers, and volunteers of around £6m (over 60 years). Furthermore, this is estimated to save the RHS £6.4 million in income generation and £3.2 million in operating surplus.
- 6.26 As described in Section 6.19, one of the major concerns for the RHS is that the DCO Scheme is scheduled for construction when the RHS has planned its major launch event to mark the culmination of their £72.4 million investment programme. By delaying the construction of the RHS Alternative Scheme by a period of 3 years, it is estimated to further reduce the impact on lost income by around £1 million.
- 6.27 The financial impacts of the proposed scheme at this time is a real and tangible major threat to its future at Wisley. The direct loss of income and operating surplus has significant implications to the financial viability of the Grade II\* Registered Park and Garden, which is crucial to its maintenance and conservation. The Society considers that this harm could be existential by comparison to the Alternative it is promoting.
- 6.28 It follows that two factors will protect the heritage of the RHS Garden. The RHS alternative will reduce the financial impact on the garden by comparison to the DCO scheme, and this should be considered as mitigation of harm in relation to significance. Secondly that a delay of the scheme to allow a revised DCO to be submitted in say 3 years will allow the strategic projects to have reached a 'steady state' in line with RHS business planning. This is aside from Covid impacts. In short, the Alternative Scheme carried out at a later stage will protect the gardens heritage in the RHS's opinion.

# 7.0 HARM TO THE SIGNIFICANCE OF THE RHS GARDENS AT WISLEY

- 7.1 In this section, I consider the impacts of the proposals on the significance of the RPG.
- 7.2 This analysis necessarily relies on the work of others as summarised in section 6. I have also interviewed RHS staff who assisted me in putting the studies into a broader context.
- 7.3 There are two categories of direct impact. The first arises from the physical characteristics of the proposed junction, which changes the character of the approach and the surrounding garden, especially Battleston Hill
- 7.4 The second arises from the financial impacts of the proposals leading to a reduction in income from visitorship, affecting the Society's ability to maintain and develop the garden, and thereby meet its charitable objectives. These are, as described previously in Section 5, part of the site's cultural value.
- 7.5 Cumulatively these pose the threat of a declining garden, and a threat to its significance which represents on their evidence a very high level of harm, possibly even substantial.

## **The Physical Impacts and Their Effects: The New Access Experience**

- 7.6 Presently one approaches the Garden by a relatively narrow road, Wisley Lane, accessed directly from the A3's northbound carriageway. All visitors arrive in this way, and it leads by a slightly sinuous route to the recently expanded car park which is screened from the approach by landscape features which are established and over time will mitigate the visual impact of the parking. Most visitors come from the south.
- 7.7 Wisley Lane has a verdant, traditional character that contrasts with the dual carriageway's, and one is aware of that change in character because of the contrast and provides a transition to the site and so foreshadows the experience of the garden.
- 7.8 That character reflects the historic experience of accessing the gardens. It has an intimate and quiet feeling that reflects the time depth of the landscape in this part of Surrey. Clearly it has been upgraded to cope with greater visitor numbers, but it retains something of that earlier character which contributes positively to the appreciation of the Garden's significance.
- 7.9 The new approach from the roundabout would be a significant work of engineering, with a raised carriageway (on an embankment) to negotiate the required level change over the main road. Its alignment reflects its purpose, and its construction will lead to the damage and loss of many trees (I am advised and on the evidence of Mr Barrell, submitted at Deadline 11).
- 7.10 Thus, the experience of arrival will change to one that is planned and engineered which is at odds with the enclosed, quiet nature of the asset and will exacerbate the effects of the A3 and the M25 extensions have already brought to the experience of the garden.
- 7.11 I appreciate that the car parking, ticketing, sales and refreshment facilities themselves are different to the original receiving areas, but that they are an essential part of the way the site delivers its charitable purpose. In my experience visitors accept them as an expedient and necessary consequence of tourism. As it happens the new RHS projects bring the Christopher Bradley Hole gardens on the outside of the payline to address this. But there is a noted qualitative difference between approaching an historic site by a lane, off a busy road, and approaching it by a piece of highway engineering that is part of a wider network.
- 7.12 The new approach provides no pause as between the experience of the road and the car park. I think this has a detrimental effect.

- 7.13 It is unclear to me whether this impact is a direct one on the RPG or an indirect or setting impact, given the nature of the boundary plan, and the fact that in this part of the garden it is not defined according to any clear rationale and spans what is a single character feature. So, whether it is a setting or a direct impact matters little to the assessment since the impact is on character and appearance.
- 7.14 Applying the GPA3 guidance, and stages 2 and 3 (pages 11 and 13) I have the following concluding observations:
- 7.15 First, as the contribution of Wisley Lane, as a setting element, I note that its scale and grain, and vegetation all contribute positively to an appreciation of the Garden's location in the Surrey countryside, which position influenced its design. Those features lend the approach an enclosed quality, and whilst the access has been upgraded to some extent it still feels like a country lane and typical of others in the locality.
- 7.16 The experience of that feature will naturally vary seasonally and during the week, but it is tranquil relative to the A3.
- 7.17 Thus, this area contributes to the significance of the asset and the way we experience it.
- 7.18 As to impact, and the checklist on page 13 of GPA3, the proposals are proximate to the asset and will be prominent in the approach by reasons of their scale and physical characteristics, producing a change to general character and the experience of public access as a consequence of the junction and access design.
- 7.19 The impact is permanent and it is experienced by all visitors.
- 7.20 The effect of this impact is harmful and less than substantial, and calibrated at the lower end of that scale of harm. It has not been assessed in the ES either in the chapter on landscape and visual impact or that on cultural heritage. I am also advised that the new Wisley Lane road will heavily serve a planned development at Wisley Airfield, comprising an allocation of up to 2,000 homes in the Guildford Local Plan. This will also change the rural feel of the approach.
- 7.21 Importantly, I understand that the overbridge design is at a concept stage, and not designed in any detail. The amount of harm will rely to a greater or lesser degree on the scale, materials, height and gradient, landscaping etc of the overbridge. In view of the potential impacts described above, and the lack of any design, there is no opportunity for the RHS, Historic England, or indeed the ExA to make an accurate assessment of this crucial intervention. The DCO scheme must take account of this lack of important information.

### **Tree Loss**

- 7.22 I understand that the Society's arboricultural advisor, Mr Barrell, has identified 44 trees along its boundary with the A3 that will be impacted by the DCO Scheme. Of those affected 39 are Grade II Heritage trees and 5 are Grade II\* Heritage Trees (according to the definition as set out in *Tree Assessment for Heritage* v12, 2013).
- 7.23 Two of the Grade II\* trees affected are North American Redwood species.
- 7.24 This pair form part of a group in the area presently laid out as the trial planting area.
- 7.25 The trees are prominent features on the skyline as one crests the Battleston Hill, and looks down into this discrete area.
- 7.26 Its character is undermined by road noise (and aural screening would be desirable and in my judgment comprise suitable mitigation for the impacts I am considering in this first part of the impact analysis).
- 7.27 These specimens are good examples of their kind, forming part of a group and they are historically associated with the early stage of the garden's design. Mr Barrell has identified these as being Grade II\* listed heritage trees.
- 7.28 The consequent harm is less than substantial and at the lower end of that scale, albeit significant for EIA purposes because of their prominence relative to the access over the hill, as noticeable features of a boundary belt.

## Financial Impacts

- 7.29 Calibrating these impacts falls out with my professional specialism but, and as established earlier, impacts arising from development in the setting of an asset, and affecting its economic viability, are heritage impacts potentially (as cited from GPA3, page 3 and the GPA3 checklist, page 11).
- 7.30 I am advised by others addressing the Inspector, and in summary understand the impacts to comprise a loss of revenue.
- 7.31 The RHS is just completing a massive capital project to further its charitable objectives, comprising £72 million pounds plus VAT.
- 7.32 It has financed that expenditure through reserves and fundraising, and on the basis of a business case of anticipated visitor numbers, increasing to 1.5 million after the opening of the new facilities.
- 7.33 The reduction in visitor numbers introduces an income loss of between £2.6 million and £4.4 million during the construction period alone, with a further £7.1 million during the subsequent 10-year operational phase. This would result in a reduction in operating surplus of up to £5.8 million by 2033.
- 7.34 This is further exacerbated by the COVID 19 lockdown and the losses in income the RHS has experienced since March, during what would typically be one of the busiest periods for the Garden. The Garden at Wisley alone has lost £6.3 million in income which has contributed to an increase in the operating deficit of around £2 million. The Garden is now predicted to make an overall operating loss of around £5 million for this financial year. The RHS as a whole has lost £18 million in operating surplus as a result of COVID 19, placing severe financial strain on the Society's financial position and its ability to support Wisley.
- 7.35 This loss of revenue compromises the charitable objectives of the Society, its ability to maintain the Garden and undertake those related activities which go to its mission, of supporting the science, art and practice of horticulture.
- 7.36 I illustrate the nature of this impact with reference to a few examples forming part of my instructions
- 7.37 The RHS have in their submission highlighted the important and critical interaction between the impacts on the growth of visitor numbers and the vitality of the charity and therefore its investment into the heritage asset at Wisley.
- 7.38 The RHS make it clear that the garden at Wisley is not profit making and has losses that are supported by other RHS activities as part of the overall charitable delivery. The business model for the SIP and investment of £72m depends on the growth of visitors.
- 7.39 It follows then that any decline in visitors to the gardens, or associated sales, would put the RHS finances under strain at a time when the business model requires an uplift in visitors
- 7.40 I understand that the growth of visitors and their spending and the funding of new facilities are all likely to be impacted by the DCO Scheme.
- 7.41 These operating losses are a significant additional loss year-on-year for a charity and I understand equate to over 60% of the RHS' current average spend on maintenance of the building stock.
- 7.42 Logically, this increasing profit loss will have an effect on reducing spend on maintenance and also on customer facing staff. Reducing spend on customer service has the knock-on effect of reducing the quality of the customer experience, likely to lead to a reduction in visitor numbers, poorer offers and corresponding lower sales, amounting to a downward financial spiral. Sales and ticket income the RHS are depended on to maintain the operation and upkeep of this site.
- 7.43 The RHS have already taken the decision to halt part of the planned £2m HLF funded restoration of the grade II listed Laboratory. This has the effect of reducing public access to the building and puts the maintenance of the significant fabric on hold.
- 7.44 The RHS have also put on hold emerging projects for site of the former Trails Field adjacent to the A3 with a new ornamental lake feature. Aside from having reduced funds, it is considered that the new overbridge and associated noise

and disruption from the upgraded A3 and diverted Wisley Lane (including Airfield traffic) will inoculate the north eastern part of the garden in the long term. This is currently one of the most visited parts of the garden, so a major loss.

- 7.45 The major projects payback is predicted to extend by at least 4 years because of the DCO scheme. This extension also has the effect of diverting funds from the day to day management of the gardens and buildings at Wisley for that time.
- 7.46 If the repayments are not affordable because the RHS is making less profit from its visitor numbers, the RHS will have to take funding from other areas, also taking more away from the investment in the upkeep of the listed buildings
- 7.47 The Society's resources have also been depleted by the many £100,000's that have been expended on fees to defend the historic asset.
- 7.48 The effects on the gardens at Wisley affect the wider operations of the RHS central funds. The RHS have identified these would include areas such as scientific endeavour, collections management and Membership benefits. A reduction in spend in these areas would feed back to the garden and contribute further to the downward spiral.
- 7.49 The RHS are necessarily concerned that the cumulative effects of these stresses on their finances will be severe.
- 7.50 Each of the above impacts affects elements of the Society's mission, which is to promote the science, art and practice of horticulture nationally and internationally.
- 7.51 Since the cultural interest of this property is both physical and performative or operational, any reduction in the latter leads to harm to the former, and hence a heritage effect which is harmful.
- 7.52 Considerable importance and weight attach to that harm, by reason of the RPG designation, and that harm must be assessed mindful of the high grading, which I have explained is accounted for by the design and horticultural activity on the site (both historic and ongoing).
- 7.53 It is hard for me, as a planner and heritage expert, to quantify the harm or advise the proceedings on the risk. Suffice it to say that the Chief Executive will be submitting written evidence that the risk as existential. On any basis, this harm is demonstrable and significant for impact purposes (including the assessment of alternatives). If that harm undermines the ability of the Society to fulfil its core purposes, then it amounts to a high level of less than substantial harm.
- 7.54 Taking a pragmatic view, and recognising that its challenge may not be successful, I am instructed that the harm to economic viability identified by the Society would be mitigated by a delay in the commencement of the works by at least 3 years.
- 7.55 This would enable its visitor numbers and related activities, and hence the Society's finances, to recover sufficient to avoid the economic hardship it anticipates will result from the scheme.
- 7.56 I must rely on the evidence of the Society, which understands its finances and the impact of the proposals on them. These have a consequential impact on programmes that maintain the heritage asset, develop it for its historic and present purpose, and limit its ability to promote the science and practice of horticulture which are again central to its cultural significance.

# 8.0 THE ADEQUACY OF THE ENVIRONMENTAL STATEMENT SUPPORTING THE PROPOSALS

- 8.1 As stated above, I have examined the Environmental Statement (Enquiry document 6.3) prepared in 2019 and commissioned by Highways England. I have reviewed the chapters on Landscape and Visual Impact, Cultural Heritage and People and Communities.
- 8.2 I did not in my review identify a part of the ES assessment that specifically examined the impact of the DCO Scheme on the heritage asset of the RHS Gardens at Wisley in terms of economic factors and the effect this could have on the operation and value of the asset.
- 8.3 This is in my opinion a serious omission. I appreciate that those who prepared the ES may not have had baseline information to hand; however, they would have understood about the RHS's recent project and so should have at least posed the question and sought clarification. I am surprised, I have to say, by this omission.
- 8.4 I note also that the DCO Scheme has the stated objective to improve access to Wisley. This has not been assessed thoroughly in these chapters or the effects on access really properly qualified or quantified in the way the RHS have done.

## **Chapter 9 (Landscape and Visual)**

- 8.5 From my reading of this chapter, the Landscape and Visual Impact assessment does not expressly consider the impact on the landscape setting of the garden, or find harm arising from such a change.
- 8.6 The landscape assessment recognises that RHS Wisley is a highly valued landscape with distinctive character. The chapter acknowledges the high sensitivity of certain areas of the study area, "notably Painshill Park and the RHS gardens at Wisley", but considers the sensitivity of the surrounding landscape to be overall, 'moderate'. I don't think this is right to blend the value of the landscape areas in this way and the assessment should have been done on the individual character areas, of which the RHS Wisley was identified as being of high sensitivity.
- 8.7 Whilst I agree that the presence of the A3 and M25 are detracting features in the wider setting of the garden, the designation of the Garden would still render this part of the wider landscape as being of high. To rate it otherwise is to accept that the infrastructure has somehow harmed the intrinsic significance of the asset, reducing its vulnerability to change and so logically reducing the impact of further change. This is, however, a relatively minor methodological point since the fact is the garden is in itself of very high significance.
- 8.8 Turning to the operation of the proposals, the landscape assessment also makes it clear that the approach and access to RHS Wisley would be modified as a result of the diversion and realignment of Wisley Lane. I quote at paragraph 9.10.7:

*The new Wisley Lane diversion itself would pass through an area of mature woodland east of the A3 where it swings round and rises on embankment to cross the A3 so losses here would be unavoidable including one veteran tree. West of the A3 a number of mature trees would be lost where the road descends on embankment adjacent to RHS Wisley to rejoin the existing Wisley Lane and where new access arrangements for the gardens are required.*

- 8.9 Thus certain aspects of the development (the new road and the engineered embankment) are judged to have an impact on the character and landscape setting of RHS Wisley and the current approach to the gardens on Wisley Lane, which I have assessed to have a particular distinctive character. This would enact a harmful change in the experience of the approach to the gardens, which currently provides a transition to the site from the modern dual carriageway. The current approach to the gardens contributes to the significance of the heritage asset, reflecting the historic experience of accessing the gardens.

- 8.10 Overall, the LVIA does not directly assess or quantify the harm caused to the registered parkland as a sensitive landscape component. Neither does the LVIA consider the change in character to Wisley Lane, as the approach to an important asset. It is my views that the ExA should have this information to hand to be able to be able to assess accurately the full potential impacts of the DCO Scheme.

### **Chapter 11 (Cultural Heritage)**

- 8.11 As part of the baseline understanding and built heritage assessment, Chapter 11 sets out the significance of the gardens at Wisley. The assessment of significance is based on the guidance laid out in Historic England's *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (2008), and not the most up to date guidance in the NPPF (2019).
- 8.12 The statement concludes that 'Wisley Gardens is a significant scientific garden'. It identifies that the set-piece gardens 'form the main significant areas of Wisley Gardens,' and does not place importance on The Laboratory. It is acknowledged that the boundary treatments 'contain specimens that form part of their significance as well as protecting the significance of the gardens'. The setting of the East part of Battleston Hill 'is fairly robust, as visibility outwards is limited to its periphery'.
- 8.13 I quote the summary here:

*Wisley Gardens is a significant scientific garden, developed primarily to propagate and test new and exotic species of plants that still fulfils its original function in this respect. New communal significances have developed over time, and a major element of the site is its more recent role as a visitor attraction, which at the same time forms a small element of its significance and has introduced elements that have eroded its significance. The gardens consist of a number of different fairly self-contained intimate, but interconnected gardens. These set-pieces form the main significant areas of Wisley Gardens. The scientific testing garden function has mostly, although not entirely, moved to the southern part of the site, to the Trial Garden on the south boundary and the greenhouses on the west side of the ridge extending westwards from the main part of Battleston Hill. However, the areas to the north of Battleston Hill and its ridge retain other significances, and still represent the core of the gardens. Most elements of the gardens have been subject to change over time, and the proposed development of buildings by the RHS within the gardens to the north of Battleston Hill, will have a significant impact on some of its core spaces.*

- 8.14 In my view, the heritage chapter does not accurately and fully reflect the significance of the site. The assessment assigns 'high significance' to the aesthetic and historic values of the gardens but concludes overall that they are in fact just 'significant.' In my view the statement underplays the scientific activity of the RHS at Wisley and the interest engendered in that historic association and the wider value of its national significance.
- 8.15 The chapter does not consider socio-economic and direct financial impacts on the asset, nor the impact in character and landscape terms of the new slip road and engineered embankment. Whilst the chapter identifies that part of the RHS' heritage value is engendered in its mission as a living practice of art, science and horticulture, and with which I of course agree, it does not go far enough to consider the nuances of the wider impacts of the DCO Scheme on that mission.
- 8.16 Chapter 11 does reference the assessment methodology employed in the study was GPA3: Historic England, *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning: 3*, 2017, (2nd Edition). That said, it does not discuss even the potential for impact through change to economic viability, and this is notwithstanding the point was expressly raised by Historic England in the early consultations (see section 9 of my report). As an experienced practitioner in this topic area, I would see it as my role, and that of the ES coordinator, to ensure all requests for information from a statutory advisor are complied with, and the information assessed even if only to rule out its relevance. The request for information was overlooked and accordingly there is no trace of it in this chapter.
- 8.17 I note here, as a matter of approach, that Historic England advised that the assessment methodology proposed placed 'Too much emphasis has been put on views to and from heritage assets (in terms of setting) and thus too little attention is paid to other ways in which a place can be experienced. A request for guidance notes was made.' That citation is taken from the SoCG with agreed with HE (3.1.3). See again my section 9.
- 8.18 Indeed, there is no specific reference to the relevant paragraph in the guidance that considers economic viability. I could not find reference in the Chapter as to the impact on the heritage asset was considered on this basis. Thus the direct or

indirect impact of the development on visitor experience, income from visitors and therefore operating revenue for the heritage asset and the experience of visitors are not assessed.

8.19 Furthermore, the assessment of the impact of the development during construction phase on the opening of the new facilities at RHS Wisley is not considered in full. The Chapter considers effects of traffic and noise associated with traffic movements, but not from the removal of trees along the boundary with the A3, an important element of the physical impacts of the proposals.

8.20 The operational effects of the proposals on the significance and value of the gardens is considered, but not in economic terms. The following assessment is made at paragraph 11.10.10 as follows:

*The Scheme would introduce only minor changes to the values of the RPG, with only slightly changed visual impacts and negligible changes in noise levels once the Scheme is operational and landscaping along the A3 is implemented (see Chapters 6 and 9). There would be no impacts on the core components of the park, nor would it prevent the appreciation of the park's designed landscape, its historic significance or its associations with the 18th century 'Picturesque' landscape movement. All historic connections and designed views within the park would be retained, allowing the park to continue to be experienced as it was originally intended. As per the methodology described in Table 11.3, this constitutes a negligible impact, and therefore slight adverse effect on the asset, which is not considered to be significant.*

8.21 The following conclusion is reached at paragraph 11.10.14 and I quote:

*A Statement of Significance was also prepared for the RHS Wisley Grade II\* Registered Park and Garden to identify the key aspects of the garden's significance and setting (Appendix 11.3). The significance of Wisley is in its cohesive garden designs, the scientific focus of the work done at the gardens, its role as a trial garden and its association with the Royal Horticultural Society. The operation of the Scheme would not affect any of the key aspects of these values and would only affect the very edge of the garden on the fringes of Battleston Hill and would therefore have only a negligible impact on the asset through a possible increase in noise levels from traffic. This would result in a slight adverse effect, which is not considered to be significant.*

8.22 There the assessment of the effects on the heritage asset falls short of taking this further and considering further or more nuanced impacts on operations and function of the asset. The chapter does not go far enough to draw conclusions on the "scientific focus of the work done at the gardens, its role as a trial garden and its association with the Royal Horticultural Society" referred to in paragraph 11.10.14 and which necessarily requires income from visitors to sustain. This is not surprising given that such economic information was not part of its baseline.

8.23 It also appears that, whilst tree damage and loss east of the A3 was acknowledged, that the ES only considered tree loss in the new Wisley Lane diversion. There is no consideration for potential tree damage and loss along the western side of the A3, within the garden, even on a cautionary basis. I consider this surprising given the nature of the garden's tree belt at this point (and the presence of obvious mature specimens of quality and historic interest relating to the garden).

8.24 In summary, the chapter does not consider the impact on the approach experience or on the viability of the asset, notwithstanding that chapter 13 of the ES does grapple with this matter to some extent (see below) albeit without any evidence to support its findings.

### **Chapter 13 (People and Communities)**

8.25 Chapter 13 of the Environmental Statement does examine the impact the development will have on routes to reach RHS Wisley via public transport and in cars from the A3 and M25 in both directions. The effects that the development will have on the revision of routes and stopping points for public transport, and the reduced convenience in accessing the site by car as well as raised journey times as set out in the other chapters of the Environmental Statement, could lead to a reduction in visitor numbers, and therefore revenue, it is acknowledged.

8.26 The implications of this for the collection's conservation are not considered and that finding was not read across to the cultural heritage chapter, as just discussed.

8.27 The Chapter considered the practical constraints of visiting the site using public transport, buses in particular, and I quote:

*13.8.36 Alterations to Number 715 bus route and its stopping places may adversely affect the ability of members of the public to access community assets during construction and once the Scheme is operational. Re-provided bus routes and/or stopping points may be less advantageous by virtue of increased journey time for those visiting assets. The revision of routes and/or stopping places may either be temporary, during construction, or permanent alterations occurring in operation. Access to RHS Wisley Gardens, which benefits at present from a dedicated stopping point, may in particular be affected. Bus stop arrangements have provisionally been agreed with Surrey County Council (who are responsible for the operation of the 715 service) and RHS Wisley, to provide a bus stop facility within the RHS Garden Wisley site as part of the Scheme.*

8.28 The Chapter goes on to consider the effects of the physical attributes of the proposals to introduce the overbridge and the knock on effects that might have on convenience.

*13.10.36 In terms of severance, the Scheme includes extensively revised access arrangement to Wisley Garden, comprising a new overbridge for Wisley Lane over the A3 and new access road south of the A3 linking to the Ockham Park junction. This arrangement is likely to be less convenient for visitors approaching from the south west on the A3, who would be obliged to exit the A3 earlier and approach via Portsmouth Road, Ripley or continue past the gardens and switch back at junction 10 and again at Ockham junction. However, these arrangements will be much safer for visitors to RHS Wisley. Therefore, in operation severance is considered to be neutral in balance.*

8.29 This chapter does not fully consider or engage with a question as to the potential adverse impacts of the proposals on the RHS's operations, with reference to their reopening after the major development.

8.30 Whilst the consented proposals for the new entrance facilities and access and car parking are included in the cumulative assessment, this does not consider the issues in combination, that is, of the potential reduction in visitor numbers with the reopening.

8.31 One of the principal focus projects of the SPI, the new entrance facilities and car parking received planning permission (16/P/01080) in September 2016 for the new entrance facilities for the following works:

*'Erection of new part single-storey part two-storey building accommodating retail, entrance and visitor facilities and alterations to the car parking and hard and soft landscaping and following the demolition of the existing plant centre, the extensions to the Laboratory building, toilet blocks, Aberconway Cottage and part of Aberconway House.'*

8.32 This consented scheme was included in the Chapter although there was considered to be no 'Additional significant operation effects' arising from the interaction with the DCO Scheme. Construction effects were identified arising from 'Driver Stress.' Commenting further on the potential interaction, it was stated:

*'Once operational, there will likely be more visitors to RHS Wisley and the Scheme improvements should increase the capacity of the network, reducing Driver Stress – but there may be increased Driver Stress due to frustration at the longer distance to be travelled to access RHS Wisley from the A3, which would be slight adverse.'* (see 6.3 of the chapter)

8.33 The statement that there will 'likely be more visitors' is an unevidenced assertion insofar as I could tell (there being no reference to visitor surveys).

## **Conclusion**

8.34 The Environmental Statement does not consider, and therefore provides no analysis of, the impact of the development on the heritage asset's visitor numbers or revenue, and consequently on its conservation or the activities that are part of that cultural significance.

8.35 This omission is notwithstanding that chapter 13 recognises a potential impact on visitor numbers, drawing a conclusion on that matter without any evidence I could see. This is surprising to say the least, particularly given Historic England's early consultation responses.

- 8.36 In any event, that potential finding was not read across into the cultural heritage chapter, whose approach to setting excludes even the consideration of economic viability or change to the experience of approaching the historic site. The LVIA chapter overlooks the change in character to the lane arising from the diversion of it, even though it acknowledged tree loss in it.
- 8.37 Furthermore, that cultural chapter's statement of significance does not accurately reflect the values of the site as outlined earlier in this report, and which were accepted in the HLF application process as relevant and valid sufficient to justify a sizeable grant (upwards of £4 million I understand).
- 8.38 Thus, I conclude the ES is insufficient in its treatment of the DCOs proposals' effects and in relation to 3 topic areas.
- 8.39 I accept that assessments of this nature may not have access to detailed financial information as a matter of course.
- 8.40 Nevertheless, the guidance identifies economic viability as a potential setting issue, and I see it as incumbent on the assessor to obtain the relevant baseline information on the receptor if only to rule out the impact or, if they rule it in, to identify the scope for mitigation. That was not done in this case.

## 9.0 HISTORIC ENGLAND'S INVOLVEMENT

9.1 The promoter has agreed a Statement of Common Ground ('SoCG') with Historic England ('HE' in this section) (see DOC 8.4, rev 3, 6 May 2020).

9.2 The tabular analysis of their responses and further information is, I consider, misleading because it overlooks the points Historic England made on four occasions (that I could find) about the potential for harm to the economic viability, and therefore conservation, of the Grade II\* RPG.

9.3 The record of this is in the Appendices to the SoCG.

9.4 Page 37, from HE's first response, March 2017, states:

*We are aware of the ambitious plans for the future of the gardens at Wisley in the 21st C and we are concerned to ensure that the future access arrangements there do not jeopardize the ability of the site to operate as a major visitor attraction. We think these issues are particularly acute at Wisley and more so than say at Painshill Park, given the existing high visitor numbers, the ambition to grow these and the existing issues when major events take place.*

9.5 The point is made again in terms in its April 2017 response, page 41:

*Furthermore, the threat to the operational activities of the site [Wisley] at a time when the Society is investing heavily in visitor facilities is real, and potentially very harmful to the long sustainable future of the site.*

9.6 This letter goes on, following page, where HE note that the financial health of Wisley is a concern:

*Through our advisory role, we seek to ensure that heritage assets are sustained in their optimum viable use, and we full support the aspirations of RHS Wisley to maintain and grow the visitor offer, whilst conserving those historic values that make the place special.*

9.7 In its 25 March 2018 letter, HE expressly link economic viability to conservation interests, on page 57 of the Appendices, where it comments on the RHS' representations and its alternative.

*We would like to know more from you as to whether these alternative road connections that they are compliant with highway design and operation standards and, if so, why you consider the Preferred Route Announcement Design is preferable. We think it is legitimate to consider how different access options to RHS Wisley are likely to impact visitor numbers and this is a historic environment concern as the sustainable operation of the heritage asset is based on its success, now and in future as a visitor attraction.*

9.8 For some reason that goes unexplained in the documentation, HE do not raise this matter again (see page 66, December 2018 letter), even though that point on economic sustainability is made in respect of Painshill Park in the same letter (page 67).

9.9 HE took no issue with the statement of significance for Wisley (see meeting notes, page 70) but for reasons I explained above I consider that the statement does not sufficiently acknowledge the broader cultural remit of the site and its operation. Neither do I understand why the concerns expressed in those early letters was not reflected in HE's review of the cultural heritage chapter (see meeting note 17 April 2019, page 74).

9.10 The topic comes up again at a later meeting, however, 1 October 2019 minute, page 84, but the discussion is inconclusive. I infer that HE's concern must have been addressed in some way by reassurance on access arrangements, but otherwise cannot explain why those concerns were dropped without any evidence on financial impact or sustainability. It is clear from the minutes that the focus of discussion was on technical design issues and direct impacts.

9.11 From this I conclude the following:

- 9.12 First, the issue of economic sustainability and heritage impact arising from decrease in revenue (in the context of the major investment the Society was making) was highlighted early in the process by a statutory consultee and in terms which reflect the concerns of the Society.
- 9.13 Second, no evidence was supplied to HE on this matter relative to the RHS' alternative and as requested. This is not surprising since the EIA process did not compile it and it did not form part of the baseline.
- 9.14 Third, and notwithstanding the first point, HE did not pursue its concerns after the announcement of the preferred design, from which point, the choice having been made, HE's concerns have to do with mitigation of design impacts.
- 9.15 Thus, and insofar as I can judge, HE has never had the opportunity to consider formally the economic viability issue with reference to evidence. I do not take, then, their agreement to the draft findings of the ES to be determinative on the heritage impact. I find no explanation as to why HE did not pursue this line of inquiry. It appears simply to have been overlooked and then dropped once the preferred design was announced, at which point discussion turned on the mitigation of the physical effects of the development. I can only express surprise at this turn of events.
- 9.16 I should add that Historic England have been invited to comment on the financial information and declined. In email correspondence, they have, however, offered to make themselves available to answer questions.

# 10.0 SIGNED AFFIRMATION

- 10.1 I have adhered to my institute's code of conduct in preparing this evidence, which reflects Annexe O of the current PINS guidance on appeals on what comprises expert evidence.
- 10.2 I confirm that, insofar as the facts stated in my heritage report are within my own knowledge, I have made clear which they are and that I believe them to be true, and that the opinions I have expressed represent my true and complete professional opinion.
- 10.3 I confirm that my heritage report includes all facts which I regard as being relevant to the opinions that I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.
- 10.4 I confirm that my duty to the Inspector and the Secretary of State as an expert witness overrides any duty to those instructing or paying me, that I have understood this duty and complied with it in giving my evidence impartially and objectively, and that I will continue to comply with that duty as required.
- 10.5 I confirm that I am neither instructed, nor paid, under any conditional fee arrangement by the Appellant. I likewise confirm that I have no conflicts of interest of any kind other than any already disclosed in my heritage report.

**Signed:**



**Dr Chris Miele RTPI  
Partner, Montagu Evans LLP**

**Date:** 03 July 2020

# APPENDIX 1.0

## CHRIS MIELE CV AND LIST OF PUBLICATIONS



# DR CHRIS MIELE

IS A PARTNER SPECIALISING IN  
PLANNING & HERITAGE

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Chris is experienced in advising on development affecting major heritage assets, including several World Heritage Sites across the UK.

## KEY SKILLS

All aspects of planning, urban design and the historic environment with particular expertise in:

- Listed building consents, including for major alterations and extensions
- New development in conservation areas
- Charitable and public projects, with an emphasis on museums, galleries and educational projects
- Masterplanning in the historic environment
- Mixed use central London
- Tall buildings
- Historic landscape characterization
- Urban extensions and visual impact

## PROFESSIONAL QUALIFICATIONS

- Member, Royal Town Planning Institute (MRTPi)
- Member, Institute of Historic Buildings Conservation
- Fellow, Royal Historical Society
- Fellow, Society of Antiquaries, London

## CLIENTS

- British Museum
- The Royal Horticultural Society
- The Royal Botanic Gardens Kew
- Oxford University
- NHS Estates
- The Design Museum
- University of Sheffield
- Trustees of the National Gallery
- The US State Department
- South Bank Centre
- University of Oxford

## SELECTED RELEVANT PROJECT EXPERIENCE

Dr Chris Miele has been a Partner at Montagu Evans since 2007. With more than 20 years' experience, Chris is a specialist in heritage and planning, Listed buildings, new developments on sensitive land and cultural development. Chris has worked on many complex, high profile projects including the British Museum, the South Bank Centre, Westminster Abbey, the Former Commonwealth Institute for Design Museum and several large central London masterplans, South West London and St Georges Mental Health Trust (LB Wandsworth and LB Richmond).

### British Museum – World Conservation & Exhibition Centre

Chris led the planning and heritage advice for the British Museum's 20,000 sq m extension known as the World Conservation & Exhibition Centre (nominated for the Stirling Prize in 2017). The project was particularly sensitive as it impacted the Grade I Listed museum and was situated in the Bloomsbury Conservation Area.

### Market Towns, Nine Elms - Wandsworth

Planning and development advisor to CIT/Green Properties on the redevelopment of a complex strategic site at the gateway to the Wandsworth section of the Vauxhall Nine Elms Battersea Opportunity Area.

### Elizabeth House, London

Townscape and heritage advice with regard to the redevelopment of this sensitive site located within the Waterloo Opportunity Area and featured within strategic views identified within the London View Management Framework, including from the Palace of Westminster WHS. The work culminated in a Townscape, Visual and Built Heritage Assessment Chapter for an Environmental Statement.

### St Michael's Square, West Croydon

Re-development at St Michael's Square, West Croydon comprising the construction of two tall buildings and façade retention of 6-12 Station Road.

## Published Works

- 'The Mystery of Ashpitel's Notebook', *Georgian Group Journal*, 2016.
- 'E A Freeman and the Culture of Gothic Revival' in Bremner and Conlin, *Making History* (OUP, 2016)
- 'Scenes of Clerical Life: the Young Scott', in G G Scott RA, ed by P Barnwell (Shaun Tyas, forthcoming).
- 'Community Heritage' and other Victorian Myths: Reflections on the English Experience', ed. Melanie Hall, *The History of Preservation: International Perspectives* (Ashurst, 2013).
- *Forgotten, Lost and Restored*, joint author (Hackney Society, 2012).
- 'Gothic Sign. Gothic Realia: Reflections on the Holy Sepulchre', in *Architectural History*, 2010.
- 'Architectural Representation', *Celebrating a Century of the Victorian Society*: 2010.
- *The Anatomy of Georgian Villa, Danson House*, author (English Heritage 2009).
- *The Supreme Court of the United Kingdom: History, Art, Architecture* (Hardcover) , editor and contributor (2010).
- *From William Morris: Conservation and the Arts and Crafts Cult of Authenticity*, editor and contributor (2005)
- "English Antiquity: Saxonism and the Construction of National Architectural Identities". In *Architecture and Englishness*, Con. Proceedings Society of Architectural Historians. (2005),ed. I. Dungavell and D. Crellin.
- *Designing the World: Engineering, Architecture and the Royal Navy*", *Architectural History* (Jrof the Society of Architectural Historians, UK),vol. 49, 2006.
- "Conservation", in *The Oxford Dictionary of Architecture*, 2005.
- "Conservation and the Development Process", *Journal of Architectural Conservation*, July 2005.
- "Danson House Restored", *Country Life*, 24 March 2005.
- "The Value of Conservation Plans?", *IHBC Yearbook*, 2005.
- "Love, Marriage and the Painted Georgian Interior", *English Heritage Collections Review*, (2001).
- "Re-presenting the Church Militant. The Camden Society and the Round Church", in *A Church As It Should Be*, ed C Webster and J Elliott(Stamford, 2000), pp 257-294.
- "Victorian Internationalism", in *The Gothic Revival. Religion, Architecture and Style in Western Europe, 1815-1914*, ed J de Maeyer and L Verpoest (Leuven/Louvain, Belgium, 2000), pp. 209-220.
- *London Suburbs*, gen ed. C Miele, technical ed. Kit Wedd, introduced by A Saint. Also contributor to first chapter: 'From Aristocratic Ideal to Middle- Class Idyll', (English Heritage, 1999), pp. 31-60.
- 'Icon of Victorian Modernity' in *Country Life*, vol. 193, 2, 1999.

- "The Battle for Westminster Hall", *Architectural History* (British Society of Architectural Historians) vol. 41 (1998), pp. 220-244.
- 'Robert Adam, Marlborough House and Mrs Fitzherbert: "The First Architect of the World in Brighton"', *Sussex Archaeological Collections*, vol. 136 (1998), pp. 149-175.
- "Real Antiquity and the Ancient Object", in *The Study of the Past in the Victorian Age*, ed. V Brand, intro. By Chris Brooks, *Oxbow Monographs* no. 73 (1998), pp. 103-125.
- *Morris on Architecture*, ed by C Miele (Sheffield, 1997). A collection of William Morris' lectures on building and architecture, with a critical introduction and annotations.
- "The First Conservation Militants", in *Preserving the Past*, ed M Hunter (Stroud, Gloucs., 1996), pp. 17- 37.
- "Art or Craft? Morris & Co Revisited", *The Victorian Society Annual*, 1996, pp. 15-21.
- "The Conservationist", in *William Morris*, ed by Linda Parry(Victoria & Albert Museum, Exhibition Catalogue, 1996), pp. 72-90.
- "Their Interest and Habit. Professionalism and the Restoration of Medieval Churches", in *A Saint and C Brooks* (Manchester, 1995), pp 151-171.
- "A Small Knot of Cultivated People: The Ideologies of Protection", *The Art Journal* (American College Art Association: special issue on Conservation and Art History), vol. 54 (Summer 1995), pp. 73-80.
- "The Restoration of the West Front of Rochester Cathedral: Antiquarianism, Historicism and the Restoration of Medieval Buildings", *The Archaeological Journal*, vol. 151 (1994), pp. 400-419.
- *Hoxton* (Hackney Society Publication, London,1993).

## Accepted but not published

- 'Morris Architectural Vision', in [The William Morris Reader](#), ed.F.Bovs (Ashgate, 2019).

## Submitted for Publication Review

- 'Between Architecture and Archaeology: the Scott-Freeman Debate'.
- 'GG Scott, Gottfried, Semper and the Hamburg Nikolaikirche'.
- 'The Great Architectural "Awakening": Glibert Scott and Pugin'.
- 'Towards a History of Vernacular Revival' from the *Journal of the Vernacular Architecture Group* (ex. Plenary session paper).
- 'The London "City Model": Technology and Planning in a Historic World City 2017 Conference Paper, Glasgow.
- 'Arts and Crafts Conservation' in *The Oxford Dictionary of Vernacular Architecture* (Oxford, the University Press, 2020 – forthcoming).
- 'Conservation and Architecture' in A. Mason et al., eds., *William Morris* (Thames and Hudson with the Victoria & Albert Museum, 2021 – forthcoming).

# APPENDIX 2.0

## EXTRACTS FROM CONSERVATION PRINCIPLES

- 51 Some aesthetic values are not substantially the product of formal design, but develop more or less *fortuitously* over time, as the result of a succession of responses within a particular cultural framework. They include, for example, the seemingly organic form of an urban or rural landscape; the relationship of vernacular buildings and structures and their materials to their setting; or a harmonious, expressive or dramatic quality in the juxtaposition of vernacular or industrial buildings and spaces. Design in accordance with Picturesque theory is best considered a design value.
- 52 Aesthetic value resulting from the action of nature on human works, particularly the enhancement of the appearance of a place by the passage of time ('the patina of age'), may overlie the values of a conscious design. It may simply add to the range and depth of values, the significance, of the whole; but on occasion may be in conflict with some of them, for example, when physical damage is caused by vegetation charmingly rooting in masonry.
- 53 While aesthetic values may be related to the age of a place, they may also (apart from artistic value) be amenable to restoration and enhancement. This reality is reflected both in the definition of conservation areas (areas whose 'character or appearance it is desirable to preserve or enhance') and in current practice in the conservation of historic landscapes.

## Communal value

- 54 Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects.
- 55 *Commemorative* and *symbolic* values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. The most obvious examples are war and other memorials raised by community effort, which consciously evoke past lives and events, but some buildings and places, such as the Palace of Westminster, can symbolise wider values. Such values tend to change over time, and are not always affirmative. Some places may be important for reminding us of uncomfortable events, attitudes or periods in England's history. They are important aspects of collective memory and identity, places of remembrance whose meanings should not be forgotten. In some cases, that meaning can only be understood through information and interpretation, whereas, in others, the character of the place itself tells most of the story.

- 56 *Social value* is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them. They tend to gain value through the resonance of past events in the present, providing reference points for a community's identity or sense of itself. They may have fulfilled a community function that has generated a deeper attachment, or shaped some aspect of community behaviour or attitudes. Social value can also be expressed on a large scale, with great time-depth, through regional and national identity.
- 57 The social values of places are not always clearly recognised by those who share them, and may only be articulated when the future of a place is threatened. They may relate to an activity that is associated with the place, rather than with its physical fabric. The social value of a place may indeed have no direct relationship to any formal historical or aesthetic values that may have been ascribed to it.
- 58 Compared with other heritage values, social values tend to be less dependent on the survival of historic fabric. They may survive the replacement of the original physical structure, so long as its key social and cultural characteristics are maintained; and can be the popular driving force for the re-creation of lost (and often deliberately destroyed or desecrated) places with high symbolic value, although this is rare in England.
- 59 Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.
- 60 Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.

# APPENDIX 3.0

## RURAL LANDSCAPES SELECTION GUIDE



Historic England

# Rural Landscapes

Register of Parks and Gardens Selection Guide



# Summary

Historic England's selection guides help to define which historic buildings and sites are likely to meet the relevant tests for national designation. Four guides, of which this is one, deal with the types of site included on Historic England's *Register of Parks and Gardens of Special Historic Interest in England* which is a constituent part of the *National Heritage List for England*.

Each guide falls into two halves. The first defines the types of site included in it, before going on to give a brisk overview of how these developed through time, with notice of the main designers and some of the key sites. The second half of the guide sets out the particular tests a site has to meet if it is to be included on the *Register*. A select bibliography gives suggestions for further reading.

This guide covers rural designed landscapes, including gardens and parks around country houses. The other three guides treat Urban, and Institutional, landscapes, and Landscapes of Remembrance, that is cemeteries and burial grounds.

First published by English Heritage March 2013.

This edition published by Historic England December 2017.

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[HistoricEngland.org.uk/listing/](https://HistoricEngland.org.uk/listing/)

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## Front cover

Deene Park, Northamptonshire (registered Grade II), created in the mid sixteenth century. The lake and bridge (listed Grade II) are of the mid eighteenth century.

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# Introduction

The *Register of Historic Parks and Gardens of Special Historic Interest in England* (now a component of the [National Heritage List for England](#)) was set up in 1983. It includes designed landscapes of many types, private and public, which are identified using explicit criteria to possess special interest. To date over 1650 sites have been included on the *Register*. Thereby Historic England seeks to increase awareness of their significance, and to encourage appropriate long-term management. Although registration is a statutory designation, there are no specific controls for registered parks and gardens unlike listed buildings or scheduled monuments. However, the [National Planning Policy Framework](#), gives registered parks and gardens an equal policy status with listed buildings and scheduled monuments.

This is one of four complementary selection guides which briefly describe the types of designed landscape included on the *Register*, and set out selection criteria for designation. This guide covers rural landscapes, mainly around private houses, including parks around country houses. The other three guides treat [Urban](#) and [Institutional](#) landscapes, and [Landscapes of Remembrance](#). Inevitably there are some overlaps; allotments and nurseries, for instance, are treated in the [Urban](#) guide. The listing of buildings in designed landscapes is considered in the [Garden and Park Structures](#) selection guide, and the scheduling of archaeological garden remains, principally but not exclusively medieval and early modern earthwork remains, is discussed briefly below in section 4 but treated more fully in the [Gardens](#) scheduling selection guide.

# 1 Historical Summary

## 1.1 Before the Romans

In recent years the landscapes of prehistoric England have continued to be explored and revealed, with existing monuments and ancient patterns of land use being interpreted through ever-changing theoretical perspectives. The use and meaning of space, whether in the house or in great ritual complexes, was clearly highly significant, and was constructed and adapted over millennia. These are landscapes of immense importance (as discussed in the scheduling selection guide treating [Ritual and Religious Sites pre-410](#)), but as yet there is no suggestion that significant places had landscapes designed purely for aesthetic effect and pleasure.

## 1.2 Roman gardens

Elaborate formal gardens associated with villas, with topiary, pools and statuary are known from classical sources. In England archaeological evidence for such has occasionally been recovered, most notably at Fishbourne (West Sussex; a scheduled monument) where bedding trenches for formal box hedges were found in excavations in the 1970s, these later being used as the basis for its reconstructed garden. At Bancroft Villa (Buckinghamshire) a formal pool was excavated in its courtyard and there have been hints of other features elsewhere. At Gorhambury (Hertfordshire) and Rivenhall (Essex; a scheduled monument) villas have been argued to stand within deliberately designed landscapes with vistas, landmarks and avenues of trees. Both in rural and urban contexts the recovery of plant remains demonstrates the potential of developing a better understanding of this aspect of Roman horticulture. As later, a garden landscape around a villa could flow into the productive estate beyond.

One notable discovery at Wollaston (Northamptonshire) was an extensive area of vineyards, evidenced by bedding trenches.

Hunting was popular in the Roman period (it was depicted, for instance, on mosaics), but where and how it was carried on in England, and whether in defined hunting grounds, is unknown. At Fishbourne it has been argued that south of the palace there was an animal park or *vivarium* (apparently similar to the later medieval 'little parks': see below) where in the first century AD fallow deer were kept; for the moment this remains unique.

## 1.3 Post-Roman

In what is conventionally termed the Anglo-Saxon period in England, neither archaeological nor historical evidence suggests the presence of designed landscapes around high status houses, although that is not to deny the possibility that the organisation of space in such complexes could be very deliberate. Hunting was popular and is mentioned in various historical sources, and the 71 'hays' (mostly in Worcestershire, Herefordshire, Shropshire and Cheshire) – the meaning of the word is uncertain but relates in some way to the containment and management of deer – and 31 deer parks mentioned in Domesday Book (1086) show that, by the time of the Norman Conquest, special enclosures for deer were being constructed, as well as lodges for those charged with their management.

## 1.4 The Middle Ages

It has long been known from literary sources like the *Romance of the Rose* and from manuscript



**Figure 1**

Bradgate Park, Leicestershire. Many registered landscapes have great time-depth. There was a deer park at Bradgate, just outside Leicester, by 1241, and during the 1490s the Marquis of Dorset built an

ambitious brick house here. In 1928 the park was bought by Charles Bennion, a local industrialist, and given to 'the people of Leicester for their quiet enjoyment'. Registered Grade II.

illuminations that castles and great houses could have small but elaborate pleasure gardens: the *hortus conclusus*, or herber. Such sources – admittedly mainly continental – indicate that in the thirteenth and fourteenth centuries their features could include turf benches, trellis work screens, tunnels and arbours, fountains, pools and rills, specimen trees and a wide range of sweet-smelling flowers and herbs in beds. Later, in the fifteenth and early sixteenth centuries, when more evidence is forthcoming from England itself, we see the appearance of knot gardens, where compartments overlooked from the house were divided by paths, typically into quarters, with curvilinear patterns picked out using plants like thyme and rosemary and coloured earth and sand. By this time great gardens incorporated carved and painted woodwork such as railings and heraldic beasts, all of which is a reminder that we should not think of 'the medieval garden' as something fixed and unchanging.

Sometimes the location of such gardens is known (like the admittedly exceptional Rosamund's Bower, in Woodstock Park, Oxfordshire, part of the Grade-I registered Blenheim Park) or can be deduced. So far there have been no targeted excavations, but the potential for investigating their character and development is very considerable. Surviving garden-related structures are rare: the stone loggia or ambulatory at Horton Court (Gloucestershire; listed Grade I) of about 1530 is exceptional, although there are a few early banqueting houses elsewhere. Productive gardens, for vegetables and herbs, were presumably commonplace, and monks are thought to have had an expertise in the growing and use of medicinal plants. Evidence for these activities has sometimes been forthcoming in the form of plant remains in waterlogged deposits. Orchards for different types of fruit are frequently documented; these too may have had an ornamental dimension.

High-status houses, whether lay or religious, frequently stood within extensive designed landscapes. There are two sites which embody this. At Kenilworth Castle (Warwickshire; registered Grade II\*) a great artificial mere was created around the royal castle in the thirteenth century, at the end of which a large moated 'pleasance' or artificial island garden was created in 1417 with a timber banquetting house and corner towers. The use of views, water, and carefully considered approaches (where visitors were taken on a proscribed, circuitous, route to show off the building) can also be seen at the second type-site, the landscape around Bodiam Castle (East Sussex; listed Grade I), built by Sir Edward Dalingridge in the 1380s. Many more examples are now known, and the setting of even quite modest manorial complexes may have had an aesthetic dimension. The most recurrent element in these schemes is water: meres, moats, fishponds and millpools, and it may be that the combination of economically productive estate components within the setting of a house was deliberate to emphasise prosperity and hospitality.

A particular variation of medieval designed landscape was the 'little park', noted especially in the fourteenth and fifteenth centuries but also later. These were clearly something different from the usual deer park (treated below). Most stood close to the house or overlooked by it, and appear to have been semi-natural pleasure grounds which provided a pleasing setting with animals and birds to watch and hear, and probably somewhere to walk; they were perhaps akin to the idealised parklands seen in some manuscript illuminations. Two dozen or more have been identified, most associated with grander castles and houses; many more are suspected.

Hunting remained popular in the Middle Ages and beyond. The English medieval kings had access to vast hunting grounds, some wooded, where Forest Law gave protection both to the deer and to the trees. The administrative framework was accompanied by structures such as lodges and boundary banks. Deer hunting was also facilitated by parks (Fig 1), where deer were confined and managed within areas of wood and grassland

circumscribed by a 'pale', that is a ditch with an outer bank surmounted by a tall oak fence. Typically parks lay away from settlements on economically marginal land, and most were of 30-80 ha. Many contained a lodge (often surrounded by a moat) for the parker (responsible for the parks management and security), and sometimes fishponds and rabbit warrens too. Physical evidence of medieval deer parks takes the form of field boundaries which fossilize the line of the pale; sometimes its surviving bank and ditch; exceptionally a park wall; and the site of the lodge. Some lodges survive as standing buildings, having become farmhouses (the name lodge can be indicative, although this was also a popular name for isolated new houses in the nineteenth century). As well as being the home of the parker, lodges were where the huntsmen and women took refreshment and planned the hunt; a single upper entertainment room and sometimes a viewing tower can give them a special plan form and interest. The number of parks grew steadily in the two centuries after the Norman Conquest, park ownership spreading from the ranks of the aristocracy to wealthier manorial lords. Estimates about how many parks were in existence by the earlier fourteenth century – largely based on the sale of royal licences – vary widely; Oliver Rackham thought about 3,200, although others feel this is too high an estimate. But whatever the total, they were commonplace. After the Black Death (1348-9) their number declined, by perhaps 30 per cent over 150 years.

## 1.5 Country house gardens 1550-1660

From the mid sixteenth century our knowledge of gardens increases with the proliferation of gardening texts and descriptions, estate mapping, and documentation in general. There is also much more that survives above ground, as the gardens of the upper classes became larger, more elaborately constructed with terraces, mounts and water gardens, and studded with garden buildings of various types.

The conversion of monasteries to country houses was probably always accompanied by at least



**Figure 2**

Lyveden New Bield, Northamptonshire. In the 1590s Sir Thomas Tresham created an extensive garden, rich in symbolism – Tresham was a staunch Catholic – linking his country house with a cruciform hill-crest garden

lodge or banqueting house. Including a water garden defined by a raised walk and (as here) mounts, this extraordinary survival, registered Grade I, has been restored by the National Trust.

a measure of landscaping and garden making. New gardens, often within the former cloisters, are sometimes glimpsed in early maps and estate paintings (the bird's-eye views of houses in their settings which became popular in England in the later seventeenth century) and the archaeological potential to recover evidence of these has been demonstrated, for instance, at Haughmond Abbey (Shropshire; a scheduled monument).

In the years after 1550 gardens began to change, and at the grandest castles and palaces Italian Renaissance ideas began to be introduced. At Kenilworth (Warwickshire) the garden received a make-over in the 1570s in anticipation of a visit by Elizabeth I, when terraces, obelisks and fountains were introduced, while at Theobalds (Hertfordshire; a scheduled monument) the enclosed courtyard gardens gained a grotto, terraces and statuary in 1575-85. Some of these great formal gardens made use of large-scale

earth-moving and a few have survived, usually because the house itself fell from favour or was demolished leaving the garden fossilized. Examples include those laid out at Holdenby (Northamptonshire; registered Grade I) by Sir Christopher Hatton after 1579; those made at Chipping Campden (Gloucestershire; site a scheduled monument) by Sir Baptist Hicks (later 1st Viscount Campden) in the 1610s; and those made by the Paston family at Oxnead Hall (Norfolk) between the 1590s and 1630s. All employed multiple terraces, probably tree-lined walks, water gardens, and also garden buildings or architectural incidents. At Holdenby all that survives of the last are the elaborate arches which gave access to the base court, but later sixteenth-century sources also evidence a three-storey banqueting house, arbours and seats. At Chipping Campden there are two fine banqueting houses (listed Grade II\*) which face each other at either end of what was the main

terrace to the front of the house; garden walls, elaborate steps, piers and gazebos are lost, although echoed by the surviving ogee-domed gatehouse. The house at Oxnead has gone as well, but what remains includes part of a brick summerhouse or gatehouse, and boundary walls with two little canted pavilions flanking a gateway (some structures listed Grade II). Missing is the statuary supplied in the 1620s by Nicholas Stone (heralding the later vogue for statues in English gardens) which included representations of Hercules, Apollo, Juno and the three-headed dog Cerberus. By the end of the sixteenth century wildernesses were starting to appear alongside the open, formal, gardens compartments and in contrast to them. These were more private, enclosed, bosky compartments: a clergyman described a wilderness as a 'multitude of thick bushes and trees, affecting an ostentation of solitariness in the midst of wordly pleasure.' Also found were arcades and 'cloistered walks', as at Harefield, Middlesex (registered Grade II), and viewing mounds in various forms including cones and four-sided pyramids. The late sixteenth-century grotto at Theobolds, mentioned above, seems to have been the first in England. In the early seventeenth century other examples started to be constructed, some subterranean some not, but all generally featuring rock- and shell-work and often gushing water. Sundials and fountains, too, were becoming both more common and more complex at this time.

Sometimes these great gardens had detached pleasure grounds at some remove from the house: one example, a water garden with ornamental buildings on islands, was at Somerleyton (Suffolk; registered Grade II\*), an Italianate garden created by the Wentworth family in the 1610s and 1620s. Water gardens in general, whether around the house or around orchards, were popular in the later sixteenth and seventeenth centuries, some contrived from earlier moats and fishponds, others entirely new. Some, like Tackley (Oxfordshire; registered Grade II; also a scheduled monument), of about 1620, and also at some remove from where its creator John Harborne lived, featured highly geometric arrangements of ponds and terraces where fishing and wildfowling

were carried on: landscapes combining pleasure and profit. Various structures could be associated with these such as boundary walls, elaborate gateways, fishing pavilions and 'supping' (eating) rooms. Even more detached was Francis Bacon's celebrated water garden at Gorhambury (Hertfordshire; registered Grade II), being planned in 1608, which was reached via a mile-long walk from his house.

These water gardens form part of a wider group of allegorical gardens and landscapes created in the decades around 1600, mirroring contemporary fashions in upper class building like the triangular Longford Castle in Wiltshire (landscape registered Grade I) and the 'curious' and witty buildings of the architect John Thorpe. The proclamations made in the 1590s by Sir Thomas Tresham of his Catholic faith via the Greek Cross-shaped New Bield at Lyveden (which stood alongside a water garden with four mounts; registered Grade I; Fig 2) and his Triangular Lodge at Rushton (both Northamptonshire; landscape registered Grade II\*) are the best known.

A very different style of garden was created at Wilton House (Wiltshire; registered Grade I) in the early 1630s by Isaac de Caus: three great flat compartments with a broad central axis leading from the house to an arcaded grotto. The first comprised four 'platts' (formal lawns) with flowers and statues; the second a grove, densely planted with trees and containing fountains and statues; the third was laid out with formal walks and ended with an imposing transverse terrace beneath which was the grotto. The central walk continued beyond this into an area of less regular groves and 'wildernesses' with an amphitheatre, triumphal arch, and statue of Marcus Aurelius.

## 1.6 Deer parks

The overall number of deer parks in the sixteenth and seventeenth centuries is hard to estimate, in part because while many were enclosed – that is divided into fields and turned over to more profitable mainstream agriculture – elsewhere, new ones were being created to cater for the

newly wealthy and the ambitious: deer farming and hunting remained signifiers of money and status. Henry VIII was a keen hunter and made new parks as did James I who was said to be 'excessively fond' of hunting. Elizabeth was also an enthusiastic participant in the hunt but typically left it to her courtiers to create parks for her entertainment. Sir Christopher Hatton's Holdenby had a garden mount designed, in part, to give a view outward to his deer park where, no doubt, he hoped to entice the queen (who in the event never came) to join him in the hunt. Weapons new to the ritual of the hunt, the crossbow and firearms, were employed, and by the sixteenth century an increasingly popular form of hunting was to wait in a stand, sometimes raised up (as in the modern word grandstand), to shoot at deer as they were driven past (after a nasty fall in 1536 Henry VIII hunted exclusively from the stand). The earliest surviving example is the same monarch's 'Great Standing' (now better known as Queen Elizabeth's Hunting Lodge; listed Grade II\*) in Fairmead Park in Epping Forest (Essex), completed in 1543, others being the so-called Hawking Tower (listed Grade I) in the park at Althorp (Northamptonshire; registered Grade II\*), built in 1612-13, and the fine one of the 1630s (listed Grade I) at the end of the deer course in Lodge Park, Sherborne (Gloucestershire; registered Grade I). Lost examples sometimes appear on early maps, and their sites can be perpetuated in place-names such as King's Standing.

One highly important development, from around the mid sixteenth century, was the imparkment of land around great houses to give privacy and a pleasing setting; previously, as has been seen, with the exception of 'little parks' which could lie alongside aristocratic residences, parks were generally in marginal landscapes and very separate from the house. Both types are shown in huge numbers on the printed county maps which appeared from the later sixteenth century.

In the seventeenth century the deer park, nominally as a hunting ground, remained an almost essential part of an estate of any pretension. J T Cliffe has estimated that there were some 850 parks, of between about 10 and

400 hectares, while in 1617 Fynes Moryson, diarist and traveller, reckoned any family with an income of £500 had a park. A good example of a hunting ground at the bottom end of the scale was the eight-hectare park at Stapleford, Leicestershire, where in 1613 Sir Philip Sherard kept thirty deer 'for his pleasure and the service of his house.' In the Civil Wars of the mid-century many estates suffered grievous losses of timber and deer, and while quantification is impossible, it is likely that from the Restoration enclosure of land of all types for profitable agriculture, and the laying out of new landscapes in the continental style around houses, contributed to the decline of the traditional hunting park. By the end of the seventeenth century, hunting the fox across open country was becoming rapidly fashionable, and the surviving deer parks took on a role that was increasingly ornamental and symbolic.

## 1.7 Country house gardens 1660 to the mid eighteenth century

As noted, the fashion for formal landscapes, much influenced by Italian Renaissance and French Baroque gardens, gathered pace after the Restoration in 1660. Garden compartments about the house, defined by gravel paths, balustrades or clipped hedges, typically comprised parterres – symmetrically divided patterns created through beds cut in lawns, low hedging, and gravel and coloured stones – with lawns, bowling greens, and *bosquets* or ornamental woods to either side and beyond. Water was sometimes used for formal pools and canals, fountains, jets, and cascades, and at some greater houses was carried into below-ground grottoes with statues of river gods. In the later seventeenth century prospects were of growing importance to garden designers, with views being carried into the countryside beyond by axial and radial avenues of trees and rides through woodland (Fig 3). Exemplar landscapes at Badminton (Gloucestershire; registered Grade I) and Chatsworth (Derbyshire; registered Grade I) were laid out by the royal gardeners George London (d. 1714) and Henry Wise (d.1745) in the late seventeenth century.



**Figure 3**

Croft Castle, Yarpole, Herefordshire. Trees have often played an important part in landscaping schemes, whether formal or informal. Veteran trees can evidence otherwise lost phases of a site's history. This line of sweet chestnuts

defining a ride dates from the mid seventeenth century, and forms the most coherent survivor of an ambitious layout of avenues and plantations. Registered Grade II\*, and a National Trust property.

After the Glorious Revolution which brought William and Mary to the throne in 1688, gardens in the Dutch style became more fashionable with complex parterres, elaborate topiary and greater use of lead urns and statues, much of it drawn from Classical mythology. Good examples of garden buildings and hard landscaping of this date, as encountered at Westbury Court (Gloucestershire; registered II\*), with its pavilion, gazebo, statuary and walls (variously listed Grade II), are relatively rare; and even Westbury is much restored.

By the 1720s, while gardens started to become less elaborate, the designed landscape beyond often became more complex and extensive, with ornamental woodlands, groves and wildernesses, as favoured by Stephen Switzer (d.1745) and Batty Langley (d.1751). No longer comprising separate walled areas, these wildernesses, filled with networks of paths and clearings, classical

sculpture and temples, were promoted as places of contemplation.

## **1.8 William Kent and early eighteenth-century landscaping**

Influential opinion, and garden fashions, now began to move away from rigidly ordered planning. Cleaner sight lines were favoured in gardens, and the ha-ha or sunken wall was introduced to allow an uninterrupted view from house and gardens across to the landscape beyond. William Kent (d.1748) created irregular gardens, which were no longer arranged using geometrical or symmetrical lines. His design for Rousham (Oxfordshire; registered Grade I; Fig 4) of 1738 was created as a circuit, where diversity and surprise were key watchwords. In this and other landscapes great attention was paid to the placement and associations of classical



**Figure 4**  
Rousham, Oxfordshire. Among England's most admired, and influential, gardens. Modified in the 1730s by William Kent, the gardens around the house were rich in garden buildings and statues, but also – notably

– looked over the River Cherwell, 'calling in' (to use Alexander Pope's phrase) the countryside beyond. That the garden has seen little later alteration adds considerably to its special interest. Registered Grade I.

structures, statues and columns within the landscape, and the order in which they were to be encountered. Sometimes the intention was to convey political ideas or affiliations to the well-educated visitor who may well have been on the Grand Tour: pre-eminent among such landscapes is Stowe (Buckinghamshire; registered Grade I), where the existing formal landscape was extended and softened in the thirty years after 1727 by Charles Bridgeman, probably William Kent, Lancelot Brown, and the owner, Viscount Cobham. By now lodges or other architectural features such as triumphal arches marked the main entry points to designed landscapes.

The 1730s and 1740s saw a relatively short-lived fashion for so-called Rococo gardens featuring serpentine or curvilinear paths, shell-decorated grottoes, and especially garden buildings and bridges in the classical, 'Gothick' or Chinese

(Chinoiserie) styles. Complete landscapes of this type were relatively rare: Painswick, Gloucestershire (registered Grade II\*), restored in the late twentieth century, is the outstanding example, and Painshill, Surrey (registered Grade I) is another. More typical was the addition of individual features or buildings to existing gardens.

### 1.9 The landscape park mid eighteenth to the early nineteenth century

Informal landscapes evolved rapidly from the middle of the eighteenth century (Fig 5). Lancelot 'Capability' Brown (1716-83), who was active from about 1750 and undertook roughly 280 formal commissions, was England's most influential and best-known designer in this style. That said, many other 'place-makers', such as William Emes in the west midlands and Marches, were



**Figure 5**  
 Shardeloes, Buckinghamshire. Charles Bridgeman's early eighteenth-century formal landscape was later modified by Nathaniel Richmond and by Humphry Repton. Then, as now, the main road from Aylesbury to

Amersham bisected the park, the north part of which is under the plough. Parks have often been ploughed (especially when corn prices were high), and this does not preclude registration. Registered Grade II\*.

operating at a regional level. And especially with modest landscaping schemes, landowners often took the lead themselves, working with estate staff. Landscapes around houses were transformed, or laid out from scratch, in an idealised 'natural' manner, with pasture ground running uninterrupted from the house (animals being kept at a distance by an unseen ha-ha) into gently undulating grounds studded with clumps of trees, and with the world beyond screened by plantation belts around the park edge. The key feature of interest was usually a lake in the middle distance, ideally contrived to resemble a great river curving through the park (Fig 6). Whilst buildings and temples were still included within the landscape to add variety and interest, they were employed more sparingly, and complex iconographic schemes were less fashionable. Typically the house was approached by a sweeping, curvilinear drive

– such parks were meant to be experienced in motion – which wound through the extensive parkland, allowing the carriage-borne visitor to catch varied glimpses of the lake and house between the parkland clumps and plantations. In ambitious schemes (such as overseen by Brown) earth might be sculpted, sometimes subtly, sometimes dramatically, to enhance the natural topography. Such landscape parks are reckoned among England's most important contributions to European civilization.

Most landscape parks were kept private by a boundary wall or railings, with entrances overseen from gatekeepers' lodges. Roads and footpaths across the park were often diverted around the perimeter, and sometimes settlements and farms were removed and rebuilt out of sight or had ornamental facades added to make them eye-catchers. Home farms, kennels and walled

gardens (listing guidelines for which are in the [Garden and Park Structures](#) selection guide), too, might be moved away from the house or concealed by planting even if, paradoxically, they were rebuilt to improve productivity and to impress the interested visitor.

While landscaped parks are generally associated with great country houses, even modest gentlemen's house, rectories, and merchant's villas might be set in an informal few acres of grass and specimen trees (such as the cedar of Lebanon) defined by an imposing wall and with some form of summerhouse to provide shelter.

In the late eighteenth century the 'natural' landscapes created by Brown and others increasingly attracted adverse criticism, most trenchantly from the north Herefordshire landowners Sir Uvedale Price (d.1829) and Richard Payne Knight (d.1824). These proponents of the Picturesque argued that sweeping lawns, serpentine lakes and parkland clumps were too

contrived to appear natural. Instead, influenced by their home surroundings, Foxley, and Downton Gorge, they promoted landscapes which were wild, rugged and varied. While their ideas were highly influential, as a style the Picturesque was difficult to introduce where the natural topography lacked dramatic incident. One designer who did work in this style with considerable success was William Sawrey Gilpin (d.1843), who was active as a landscape gardener from about 1806.

Landscape parks also attracted criticism as they lacked interest around the house. Families wished to have grounds to walk in, shrubs and flowers to provide colour, scent, and seasonal change, and a degree of shelter and privacy from the world beyond. Humphry Repton (1752-1818), who set up in business in 1788 with an aspiration to become England's leading landscape designer, initially worked in imitation of Brown's style but from about 1800, as evidenced by his before-and-after 'Red Book' proposals (roughly 125 are known to survive



**Figure 6**  
Compton Verney, Warwickshire. Lancelot 'Capability' Brown landscaped the park between 1768 and 1774 for John Verney, 14th Baron Willoughby de Broke. This followed on from Robert Adam's remodelling of the

house, which Brown made to appear as if it stood on the banks of a great river. Restoration and replanting is ongoing. Registered Grade II\*.



**Figure 7**

Many places saw more than one episode of landscaping. At Attingham (Shropshire) much of the early park-making of 1769-72 was by Thomas Leggett a ‘pompous and dictatorial’ Irishman. Another phase

of work, including enlargement of the park, followed the delivery of a Red Book by Humphry Repton in 1798. Registered Grade II\*, and a National Trust Property.

from some 350 commissions), re-introduced raised terraces around the house to separate it from the grounds beyond. Sometimes these terraces were decorated with elaborate flower urns. Pleasure grounds comprising flower beds, lawns, shrubberies and walks, sometimes with edged pools, summer houses, statuary and other architectural features, again became commonplace between the house and park in a style called the *Gardenesque*, coined in 1832 by the highly influential horticulturalist John Claudius Loudon (1783-1843). The 1820s Swiss Garden at Old Warden (Bedfordshire; registered Grade II\*) shows this at its busiest, with structures and flower beds set close together to enliven the garden route.

### 1.10 Victorian formality

Mid and later nineteenth-century garden styles remained highly varied, although some common trends can be picked out. Plant availability increased markedly, both through introductions

of species from around the world, and as a consequence of the removal of duty on plate glass in 1845 which saw large-scale glasshouses proliferate in kitchen gardens. As a result planting, and especially elaborate formal bedding schemes, became more ambitious, encouraged by an expanding horticultural press (Fig 9). Technology also came more to the fore, with cheap and relatively efficient lawnmowers.

From around the 1840s, with W A Nesfield (d.1881) the most influential designer, historically-inspired revivalist gardens became evermore popular. Complex French-style parterres with box hedges and coloured gravels were laid out alongside the main garden fronts of houses, often combined with Italianate terraces, balustrading and stairways. Trentham (Staffordshire; registered Grade II\*) of the 1830s and Osborne (Isle of Wight; registered Grade II\*) of the 1850s were among the most ambitious of many large-scale schemes. In some gardens compartmentalisation was used to group plants with common characteristics or



**Figure 8**

Druids' Temple, Ilton, North Yorkshire (listed Grade II). Designed landscapes sometimes had outlying features, as eye-catchers or detached gardens to be visited on an excursion. This folly of

about 1810 stands three miles from Swinton Park (registered Grade II\*), behind which lies a whole early nineteenth-century megalithic landscape.

country of origin to together; the 'world garden' at Biddulph Grange (Staffordshire; registered Grade I) of the 1850s is perhaps the most striking example of this. Its creator, James Bateman (d.1897), owed his great wealth to industry; many of the most ambitious Victorian gardens, like the houses they complemented, were similarly the fruit of remarkable commercial success.

In fact, formality did not go unchallenged, and Nesfield's extravagant and labour-intensive schemes soon fell out of fashion, and very different gardening philosophies were promoted. The horticultural writer and gardener William Robinson (d.1935) advanced a predominantly plant-centred approach to garden design, and his book *The Wild Garden* (1870) influenced garden designers all over the world, including the Netherlands, Germany and the USA. He rejected

traditional Victorian bedding-out schemes in favour of 'natural' or 'wild' gardens, such as that created at his home, Gravetye Manor, East Grinstead (West Sussex; registered Grade II\*), and advocated the use of both wild and garden plants, blended with exotics from other countries. The Royal Horticultural Society had been founded in 1804; its Garden at Wisley (Surrey; registered Grade II\*), developed by George Ferguson Wilson from 1878 to 1902, consists of a collection of different planting areas designed to take advantage of the terrain and soil conditions.

In part because of further developments in publishing, including the launch of *Country Life* in 1897, the 1890s saw a growing interest in garden design in general, and especially more academically correct formal gardens. Reginald Blomfield's *The Formal Garden in England* was



**Figure 9**  
 Wrest Park, Bedfordshire. One of England's grandest early eighteenth-century gardens, by George London and Henry Wise, with a banqueting house (listed Grade I) by Thomas Archer. There are two main later phases: of about 1760,

when 'Capability Brown' softened formal canals and undertook planting; and the 1830s, when formal parterres (now restored by English Heritage) complemented a new mansion in the French style. Registered Grade I.

published in 1892, and Henry Inigo Triggs's *Formal Gardens in England and Scotland: Their Planning and Arrangement and Ornamental Features* in 1902. An expanded third edition of Alicia Amhurst's *A History of Gardening* in 1905 claimed 'Ten years before the close of the nineteenth century gardening was still the passion of the few, now it is the craze of the many.'

### 1.11 The twentieth century and Revivalism

That taste for Revivalism in garden design persisted after the First World War. Many garden designers travelled to Italy and elsewhere to study historic gardens, which inspired their designs. At Cliveden (Buckinghamshire; registered Grade I) and later at Hever Castle (Kent; registered Grade I),

the former American Ambassador in Rome, William Waldorf Astor, laid out extensive formal and ornamental gardens in the Italian style. However, the true spirit of Italian Revival gardens was probably best expressed by Harold Ainsworth Peto. At Iford Manor, Freshford (Bath and North East Somerset / Wiltshire; registered Grade I), his own home, he laid out an Italian formal garden on a steep hillside, adorned with sculptures and artefacts brought back from his travels in Italy. Garden reconstruction and recreation became popular too. At Hazelbury Manor, Box (Wiltshire; registered Grade II) the architect Harold Brakspear laid out a formal garden inspired by the early seventeenth-century garden that once surrounded the house. Other styles, including Moorish, Dutch, and Oriental were also explored, as at Bitchet Wood, Seal (Kent; registered Grade II\*), where in 1919-21 the architect Raymond Berrow laid out

a Japanese garden based on a plan published in Joseph Condor's book *Landscape Gardening in Japan* (1893).

## 1.12 Arts and Crafts gardens

From about 1900, influenced by the Arts and Crafts Movement and inspired by William Morris's garden at Kelmscott Manor (Oxfordshire; registered Grade II), many garden designers became interested in English vernacular gardens using local materials and native plants and flowers. Gertrude Jekyll and Edwin Lutyens who collaborated on more than a hundred commissions between 1890 and 1914, were especially influential. One of the best

examples of their collaboration is Hestercombe (Somerset; registered Grade I; Fig 10). Here, typically, Lutyens' formal architectural features were successfully combined with Jekyll's informal planting schemes characterised by drift planting with colour sequences to create what Alexandra Harris called 'carefully planned spontaneity'.

In 1900 the landscape architect Thomas Mawson published his book *The Art and Craft of Garden Making*, which greatly influenced early twentieth-century garden design. Although Mawson drew on both revivalism and the Arts and Crafts movement, he also embraced the use of modern materials including concrete and asphalt for his hard landscaping, thus paving the way to modern design.



**Figure 10**  
Hestercombe, Somerset. The register includes selected examples of the work of England's most highly-regarded landscapers and garden designers. Here the Hon. E W B Portman commissioned Edwin Lutyens to

design new formal gardens, pleasure grounds, and walled gardens in 1904-06, with planting schemes by Gertrude Jekyll. Registered Grade I.

At this time, sports facilities such as tennis courts and swimming pools were incorporated into garden design too, a trend that developed further in the 1930s. At Steeple Manor (Dorset; registered Grade II), a very young Brenda Colvin, laid out one of her first gardens in 1923-4, which successfully accommodates space for cars despite clearly remaining rooted in the Arts and Craft tradition.

### 1.13 Plant-centred gardens

Plant-centred gardening remained popular throughout the twentieth century (Fig 11). Harold Nicolson and Vita Sackville-West's garden at Sissinghurst Castle (Kent; registered Grade I),

developed from 1930, and Rosemary Verey's garden at Barnsley House (Gloucestershire; registered Grade II), to which she moved in 1951, are often seen as the embodiment of this particular gardening tradition. Sackville-West defined her approach as 'profusion, even extravagance and exuberance, within confines of the utmost linear severity.' Also influential was the garden and arboretum created between the 1950s and 1970s by Sir Harold Hillier, a plantsman of world reknown, at Jermyns House, near Romsey (Hampshire; registered Grade II). During the twentieth century gardening became a leading pastime for a growing number of people as urbanisation and home-ownership became increasingly widespread. From the 1930s, many



**Figure 11**  
Kelmarsh Hall, Northamptonshire. Here the interest of the eighteenth-century landscape, an essential setting for James Gibbs's Grade I house of about 1730, is greatly enhanced by the gardens created

between the 1920s and the 1950s by Nancy Lancaster and Sir Geoffrey Jellicoe, with assistance from the plantswoman Norah Lindsay. Registered Grade II\*.



**Figure 12**

Dartington Hall, Devon. There will always have been gardens around this major fourteenth-century house; tradition has it that this level area with terracing behind was a medieval tilt-yard. There were major

landscaping works here between the 1920s and 1940s, and the earthworks were probably reworked at that time. Gardens, like buildings, can see dynamic change – not always well-documented. Registered Grade II\*.

more people lived in suburban houses with gardens, and plant-focused gardening became increasingly popular; the Festival of Britain (1951) also promoted an emphasis on domestic-scale horticulture. *Gardeners' Question Time* was a wireless staple from 1947. Magazines for the amateur gardener became glossier, and in 1968 *Gardener's World* was launched by the BBC. In the late twentieth century an increased interest in 'green matters' and sustainability was in part behind the incorporation of such features as wildflower meadows in gardens, and a renewed interest in fruit and vegetable gardening.

## 1.14 Modernism and beyond

The 1930s saw strong Modernist themes emerge in domestic architecture, but this rarely extended to include garden design: The Homewood in Esher, Surrey (1938; Listed Grade II), where the architect Patrick Gwynne consciously planned a woodland garden, is an early and rare example. What did prove inspirational were the ideas of Le Corbusier and Frank Lloyd Wright who revisited ideas on how their houses should relate to the surrounding landscape. Here the location of the house was carefully chosen, making full use of the existing geography and contours. In some cases existing parkland with mature trees, or a former walled garden, was seen as the ideal location. A



**Figure 13**

Boughton House, Northamptonshire. Orpheus, designed by Kim Wilkie, a major new garden feature, constructed 2007-9. An inverted pyramid, it mirrors the mount behind, part of the grand, early eighteenth-

century Grade I registered formal landscape created by the 1st and 2nd Dukes of Montagu. Designation does not prevent change.

particularly strong interaction or integration with the surrounding landscape could be achieved, for example, by blurring the boundaries between indoor and outdoor spaces, by including external rockwork or trees into the interior, and by using full-height picture windows to frame distant views of the landscape. Valley Spring in Bath (listed Grade II) and Parkham Wood House in Brixham, Devon (listed Grade II) are good later examples from the 1960s.

Intact gardens dating from the 1930s are rare in England. One survival is the garden at St Ann's Court, Surrey (registered Grade II\*) by the landscape architect Christopher Tunnard, a student of the garden designer Percy Cane. This

is a 1937 remodelling of an existing eighteenth-century landscape to complement the modernist Grade II\* listed house designed by Raymond McGrath. A year later Tunnard published his polemic *Gardens in the Modern Landscape* (revised edition 1948) in which he condemned contemporary garden-making in England as suffering from the burden of past history and an excess of horticulture, and through which he promoted the concept of the 'functional landscape'. That said, during the Second World War and the Austerity Years which followed when few private houses were built, commissions for new gardens were rare, and not until the 1950s and 60s did garden designers in England develop a truly modern garden style.

During that post-war period English garden designers found inspiration in the work of Dan Kiley and Roberto Burle Marx in America and Brazil, and were influenced by contemporary abstract painting and sculpture. Use of abstract shapes, consisting of strong lines or soft curves, and their symbolism and spiritualism, had a profound impact on garden and landscape design. Japanese gardens, having a long tradition of successfully integrating in- and out-door spaces, also became an important source of inspiration, as did contemporary Scandinavian landscape design. The Japanese Garden created in 1964 at the New House, Shipton-under-Wychwood, Oxfordshire (house listed Grade II\*; garden registered Grade II\*) is a good example. Materials such as brick and concrete were popular in hard landscaping, and planting was mainly used architecturally, with specimens selected for their strong shapes and foliage patterns. Ideas were spread by publications such as Sylvia Crowe's *Garden Design* (1958) and John Brookes's *Room Outside: A New Approach to Garden Design* (1969).

From the 1950s, some country-house owners commissioned new gardens, or embellished and expanded earlier schemes. The best examples were often laid out by designers of national importance, as at Sandringham House, Norfolk (registered Grade II\*), which includes an interesting mid twentieth-century design by the landscape architect, town planner and architect Sir Geoffrey Jellicoe. Since the 1980s, garden and landscape design has been influenced by post-modernist theories, as explored (often on a grand scale) by the landscape architect and theorist Charles Jencks and arguably more

recently by Kim Wilkie at Boughton House (Northamptonshire), where he designed a new feature called Orpheus, for the Grade I registered early-eighteenth century landscape (Fig 13). The 1950s also saw the first research-based garden restorations (or reconstructions), again typically at country houses, both by private owners and by organisations such as the National Trust. The seventeenth-century garden at Westbury Court, Gloucestershire (registered Grade II\*), was an early and influential restoration, carried out by the National Trust in the late 1960s, and Painshill, Surrey (registered Grade I) another. Such projects were undoubtedly encouraged by the rise of country house visiting as a mass leisure activity.

The post-war years also saw the opening of sculpture gardens, which have antecedents in the courtyard displays of statuary in the classical and Renaissance worlds. They include the Barbara Hepworth Sculpture Garden, St Ives, Cornwall (registered Grade II; now the Barbara Hepworth Museum), a garden created, and expanded, in the 25 years after 1949 as a setting for a group of her own sculptures. The large-scale expressionist welded metal figures by Lynn Chadwick in Lypiatt Park (Gloucestershire) add considerably to the special interest of the Grade II\* registered landscape within which it lies.

In the early twenty-first century interest in historic gardens has seldom been greater; landscapes are restored and added to, while ever more publications explore the stories of particular places and designers. England's place in garden-making has few challengers.

# 2 Criteria for Registration

All sites included on the *Register of Parks and Gardens* must hold a level of significance defined as ‘special historic’ interest in a national context. Nine general criteria have been defined, five relating to date and rarity, and four to other considerations, which have been used in assessing candidates for inclusion since the start of the *Register* in the 1980s.

## 2.1 Date and rarity

The older a designed landscape is, and the fewer the surviving examples of its kind, the more likely it is to have special interest. Likely to be designated are:

- Sites formed before 1750 where at least a significant proportion of the principal features of the original layout is still in evidence
- Sites laid out between 1750 and 1840 where enough of the layout survives to reflect the original design
- Sites with a main phase of development post-1840 which are of special interest and relatively intact, the degree of required special interest rising as the site becomes closer in time
- Particularly careful selection is required for sites from the period after 1945
- Sites of less than 30 years old are normally registered only if they are of outstanding quality and under threat.

## 2.2 Further considerations

Further considerations which may influence selection, and may exceptionally be sufficient by themselves to merit designation, are as follows. In each case there is an expectation that at least a significant proportion of the main elements of the designed landscape layout survives:

- Sites which were influential in the development of taste, whether through reputation or reference in literature
- Sites which are early or representative examples of a style of layout or a type of site, or the work of a designer (amateur or professional) of national importance
- Sites having an association with significant persons – the gardens of John Milton (Milton’s Cottage, Chalfont St Giles, Buckinghamshire, registered Grade II); Jane Austen (Chawton House, Faringdon, Hampshire, registered Grade II); and Gilbert White (The Wakes, Selborne, Hampshire, registered Grade II\*), for instance, are registered – or historic events (Boscobel, Shropshire, registered Grade II, where Charles II was concealed in the Royal Oak in 1651, where the contemporary garden survives as well as the successor to the Royal Oak)
- Sites with a strong group value with other heritage assets

# 3 Specific Considerations

In this section, more specific guidance is given relating to the registration of rural landscapes, which outlines our approach in assessing candidates for being added to the *National Heritage List for England*.

## 3.1 Documentation

Whatever its date and type, where a landscape's creation or development is particularly well documented it will almost always add to its interest, and can merit designation at a higher grade.

## 3.2 Group value and listing

The presence of a contemporary building around which landscaping took place is not a prerequisite for designation. However, if there is a contemporary house, this will almost certainly strengthen a case for designation, or possibly designation at a higher grade. So too will the presence of garden buildings and structures such as walls and steps. This will especially be so where those structures are listed (see the [Garden and Park Structures](#) selection guide). The same principles apply to designed landscapes at some remove from a house like water gardens and deer parks, where a lodge will add interest.

## 3.3 The natural landscape

All designed landscapes, and not the least landscape parks, will be influenced by, or draw on the natural topography within their bounds, and in the surrounding countryside (what is often termed setting). In terms of assessment for inclusion on the *Register*, and grading, as much as possible natural advantage and beauty (or lack of) will be set aside, and it will be the design concept and its implementation and survival which will be appraised. That said, there are cases where the natural landscape has been deliberately appropriated as a principal feature of the design, and here this will be a factor – sometimes an important one – in assessment. This would apply, for instance for the picturesque cleft forming Downton Gorge (Shropshire and Herefordshire; registered Grade II\*), and with Thomas Mawson's formal gardens at Rydal (Cumbria; registered Grade II\*) which contrast deliberately and spectacularly with a backdrop provided by the jagged peaks of the Lake District.

### 3.4 Authenticity

Especially where a house has remained as the focal point of a designed landscape, its gardens, pleasure grounds and parkland will have seen change. This may at one end of the scale be the result of ongoing routine management, replacement and repair, and on the other the product of more vigorous campaigns of alteration, restoration or even recreation (Fig 12). Change through routine works is unlikely to have had a seriously detrimental effect on the character of the landscape, whereas unsympathetic restoration may have; each case will have to be judged on its merits. A recreated landscape is unlikely to merit designation, unless through time (and almost certainly upwards of 30 years) it becomes of historiographical interest. An example of this is the Grade-II registered garden at Ann Hathaway's Cottage, Starford-on-Avon (Warwickshire).

### 3.5 Condition

If a site is in poor condition, or if a park is under the plough (a rapidly reversible condition), it will nevertheless remain a candidate for designation where its overall design or layout remains sufficiently intact. However, if a site is irreversibly lost, for example to housing, it will not be eligible for registration, irrespective of any former historic importance.

### 3.6 Planting and the Register

For many people, the mention of the word garden conjures up a vision of floral beauties or culinary possibilities. However, the *Register* is concerned with the more structural design elements in the landscape such as landform, built structures, walks and rides, water features, structural shrubberies, arboreta, hedges and trees, and not the more ephemeral, shorter-lived plantings of herbaceous perennials, annuals, roses, and most shrubs. However, where historic planting schemes or plant collections survive, these will probably add interest to the site; a particularly fine scheme might contribute towards a high grade.

Where a plant collection is of interest for purely scientific or botanical reasons, it will not be registerable. Responsibility for the national collection of plants rests with the Royal Botanic Garden, Kew.

### 3.7 Archaeological interest

In terms of below-ground archaeology, it will only exceptionally be the case that enough is known about it for it to be included in the assessment. If, however, whether through excavation or geophysical survey, it is demonstrably the case that there are high-quality, well-preserved, below-ground remains, then this may well strengthen the case for designation, or designation at a higher grade. Normally, the earlier the date of any known archaeological survivals, the greater their potential importance.

Where an historic garden has been entirely abandoned, scheduling rather than registration will generally be the most appropriate designation to consider. Scheduling can also be considered for any substantial or significant portion of garden earthworks or other archaeological remains which lie in parkland or farmland beyond the boundary of a current garden. For guidance in such cases see the [Gardens](#) scheduling selection guide. Some sites, such as Harrington (Northamptonshire) have 'double designation', that is they are both scheduled and registered (the latter at Grade II\*). Henceforward such duplication will be avoided and the most appropriate designation regime will be chosen. It will remain the case that specific archaeological sites (which may or may not be directly associated with the designed landscape) may be scheduled within a wider registered landscape.

### 3.8 Deer parks

The huge number of deer parks in medieval and early modern England, and their character, are discussed above. A very few survive fairly intact today (the National Trust estimates that 10 per cent of parks extant in 1300 still

contain deer) enjoying a mixture of deciduous woodland and open grassland within a boundary with a still-extant bank-and-ditch pale. Deer parks established in the medieval to early modern periods may be eligible for inclusion of the *Register of Parks and Gardens*; fundamental will be the survival of the park interior, or a large part of it, unenclosed for agriculture and with its woods, trees and grassland intact, and with its perimeter clearly defined by banks, walls or hedges. The presence of structures such as lodges and deer shelters, especially where listed, will generally add to a park's interest. So, too, will be the survival of the principal house with which the park was associated, especially where there is a visual relationship between the two. An example would be Whitcliff Park, which was (and is) the deer park of Berkeley Castle (Gloucestershire) and is inter-visible with it. Together, these landscapes are registered at Grade II\*.

### 3.9 Sports grounds

Country house parks which include golf courses will be assessed as parks, rather than as sporting landscapes. Structures associated with sports grounds such as stands and pavilions may be eligible for designation, and guidance on this is provided in the [Sports and Recreation Buildings](#) listing selection guide. Historic England provides guidance on the design and management of golf courses in historic parks via [Golf in Historic Parks and Landscapes](#).

### 3.10 Grading

While all registered sites are considered to be of a sufficiently high level of special historic interest to merit a national designation, the sites included on the *Register of Parks and Gardens* are divided into three grade bands to give added guidance on their significance. The three grades are Grade I (of exceptional interest), Grade II\* (of more than special interest) and Grade II (of special interest, warranting every effort to preserve them). Having begun by assessing the best-known designed landscapes, we accordingly have a high percentage registered in the higher grades, and 37 per cent of all such sites are graded in a Grade I or Grade II\* ranking; by way of comparison, only 8 per cent of listed buildings are designated at these levels.

# 4 Select Bibliography

## 4.1 General

Campbell, S, *A History of Kitchen Gardening* (2005)

Harris, J, *The Artist and the Country House* (1979)

Harris, J, *The Artist and the Country House from the Fifteenth Century to the Present Day* (1996)

Strong, R, *The Artist and the Garden* (2000)

Taigel, A, and Williamson, T, *Parks and Gardens* (1993)

Taylor, C, *Parks and Gardens of Britain: a Landscape History from the Air* (1998)

Thacker, C, *The Genius of Gardening: the History of Gardens in Britain and Ireland* (1994)

Watkins, J, and Wright, T, *The Management and Maintenance of Historic Parks, Gardens & Landscapes* (2007)

Tim Mowl is the lead author on a county-by-county series of books on historic parks and gardens. To date volumes have appeared on Cambridgeshire and the Isle of Ely, Cheshire, Cornwall, Dorset, Gloucestershire, Herefordshire, Northamptonshire, Oxfordshire, Somerset, Staffordshire, Warwickshire, Wiltshire and Worcestershire. Many other counties have coverage by other authors.

## 4.2 Roman

Zeepvat, R J, 'Roman Gardens in Britain', pages 53-9 in Brown, A E, (ed), *Garden Archaeology* (1991)

## 4.3 Medieval

Creighton, O, *Designs upon the Land: Elite Landscapes of the Middle Ages* (2009)

Harvey, J, *Medieval Gardens* (1981)

Landsberg, S, *The Medieval Garden* (1996)

Liddiard, R, *The Medieval Park: New Perspectives* (2007)

Mileson, S A, *Parks in Medieval England* (2009)

## 4.4 Early modern

Downing, S J, *The English Pleasure Garden 1660-1860* (2009)

Henderson, P, *The Tudor House and Garden* (2005)

Jacques, D, *The Gardens of William and Mary* (1988)

Mowl T, and Earnshaw, B, *Architecture Without Kings: The Rise of Puritan Classicism under Cromwell* (1998). Includes a chapter (pages 205-24) on garden design.

Strong, R, *The Renaissance Garden in England* (1979) *The Anglo-Dutch Garden in the Age of William and Mary* (vol. 8, 1988, of *Journal of Garden History*)

## 4.5 Eighteenth century

Mowl, T, *Gentlemen and Players* (2000)

Symes, M, *The English Rococo Garden* (1991)

Turner, R, *Capability Brown and the Eighteenth-Century English Landscape* (1999 edn.)

Williamson, T, *Polite Landscapes: Gardens and Society in Eighteenth-Century England* (1995)

## 4.6 Nineteenth century

Daniels, S, *Humphry Repton. Landscape Gardening and the Geography of Georgian England* (1999)

Elliot, B, *Victorian Gardens* (1986)

Jacques, D, *Georgian Gardens: the Reign of Nature* (1990)

## 4.7 Twentieth century

Brown, J, *Gardens of a Golden Afternoon. The Story of a Partnership: Edwin Lutyens and Gertrude Jekyll* (1994 edn)

Brown, J, *The Modern Garden* (2000)

Harris, A, *Romantic Moderns: English Writers, Artists and the Imagination from Virginia Woolf to John Piper* (2010), pages 227-45

Ottewill, D, *The Edwardian Garden* (1989)

Waymark, J, *Modern Garden Design: Innovation since 1900* (2003)

## 4.8 Periodicals

The key periodical is *Garden History*, published twice a year by the Garden History Society (which in 2015 became a part of The Gardens Trust).

## 4.9 Websites

[Parks & Gardens UK](#) is the leading on-line resource dedicated to historic parks and gardens across the whole of the United Kingdom.

# 5 Where to Get Advice

If you would like to contact the Listing Team in one of our regional offices, please email: [customers@HistoricEngland.org.uk](mailto:customers@HistoricEngland.org.uk) noting the subject of your query, or call or write to the local team at:

## **North Region**

37 Tanner Row  
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YO1 6WP  
Tel: 01904 601948  
Fax: 01904 601999

## **South Region**

4th Floor  
Cannon Bridge House  
25 Dowgate Hill  
London  
EC4R 2YA  
Tel: 020 7973 3700  
Fax: 020 7973 3001

## **East Region**

Brooklands  
24 Brooklands Avenue  
Cambridge  
CB2 8BU  
Tel: 01223 582749  
Fax: 01223 582701

## **West Region**

29 Queen Square  
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BS1 4ND  
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Fax: 0117 975 0701

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# Acknowledgements

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### © Other

Figure 7: F Calvert, *Picturesque Views ... in Shropshire* (1834)



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Publication date: March 2013 © English Heritage

Reissue date: December 2017 © Historic England

Design: Historic England

# APPENDIX 4.0

## OTHER STRUCTURES AT RHS WISLEY – SIGNIFICANCE

## Extract From Section 5: The Significance of the Buildings at Wisley



### Buildings Ascribed 'Exceptional Significance' in the Conservation Plan

#### *Gardiner's House*

- 5.1 Outline history: built 1904 as the first home of the garden's superintendent, and one of the earliest RHS-commissioned buildings here.
- 5.2 Architectural and artistic interest: a handsome Arts and Crafts design, with a variety of historical motifs, attributed to Edwin J. Stubbs in the 2014 Heritage Statement.
- 5.3 Historic Interest: of high interest as the superintendent's first residence. The terra cotta cartouche with the RHS' royal badge embodies this prestige. The building was also used as a meeting room for the RHS Council. In recent times the building was used as a library. It is named after a celebrated curator, Jim Gardiner.
- 5.4 Importance to Setting: considerable, being located close to the Laboratory and in a prominent position close to the Wilks Gateway, the former entrance to the gardens.
- 5.5 Overall Significance: **high**.

#### *Weatherhill Cottage*

- 5.6 Outline history: built in c.1890 and thus part of the original, Fergusson Wilson, site prior to the arrival of the RHS.
- 5.7 Architectural and artistic interest: of some interest for its use of the W. Lascelles and Co. concrete construction technique (patented in 1875) using dyed concrete tiles.
- 5.8 Historic Interest: of considerable interest for pre-dating the RHS and reflecting the early years of the site.
- 5.9 Importance to Setting: high. The house closes one of the chief walks and is visible from many places.
- 5.10 Overall Significance: **considerable**.

#### *The Loggia*

- 5.11 Outline history: this is a re-use of an earlier building. The original structure was used as a potting and packing shed and dates from 1910-12. It was then re-purposed during the Geoffrey Jellicoe phase in which the Canal was dug, and became a shelter.
- 5.12 Architectural and artistic interest: of high interest as an imaginative re-use of one of the earliest structures at Wisley.
- 5.13 Historic Interest: considerable, combining earliness of date with being a key element in Jellicoe's major remodelling of the heart of the garden.
- 5.14 Importance to Setting: exceptional. The most dramatic formal view in the site is to be had from within this structure, looking towards The Laboratory.
- 5.15 Overall Significance: **considerable**.

#### *Former Entrance Courtyard and Wilks Gateway*

- 5.16 Outline history: the Wilks Gateway dates from 1925 and was made in memory of the Rev. William Wilkes, the long-serving former Secretary of the RHS (1888-1920).
- 5.17 Architectural and artistic interest: considerable. The Tijou-style gates are fine examples of the Baroque Revival in wrought ironwork. The RHS badges, the Wilks monograms and the incorporation of the renowned Shirley poppy are all of skilful execution.
- 5.18 Historic Interest: considerable, honouring a noted figure in RHS history who oversaw the RHS's move from London to Wisley. This was formerly one of the key entrances to the gardens.
- 5.19 Importance to Setting: considerable, being located on a prominent walk close to Gardener House and The Laboratory.
- 5.20 Overall Significance: **considerable**.

*The Weather Station*

- 5.21 Outline history: Wisley has had a weather station since 1904; it has been in this location since 1964.
- 5.22 Architectural and artistic interest: very low, being a collection of instruments (some mounted on brick plinths) and a hut.
- 5.23 Historic Interest: high, in terms of meteorological reporting.
- 5.24 Importance to Setting: low.
- 5.25 Overall Significance: **low**, when seen in terms of heritage planning.

*The Walled Garden*

- 5.26 Outline history: a combination of an Edwardian SW wall, incorporated into a walled garden during the c.1970 Jellicoe phase of alterations. The formality dates from this phase, when the urns were introduced. Lanning Roper was responsible for the planting.
- 5.27 Architectural and artistic interest: moderate.
- 5.28 Historic Interest: moderate.
- 5.29 Importance to Setting: considerable, forming a strong group with The Pines and The Loggia.
- 5.30 Overall Significance: **moderate**.

**Buildings Ascribed 'Considerable Significance' in the Conservation Plan**

*The Pines*

- 5.31 Outline history: dated 1910 on its heraldic RHS cartouche, an expression of its status as a purpose-built residence for students.
- 5.32 Architectural and artistic interest: a handsome domestic revival house, little altered.
- 5.33 Historic Interest: the building possesses some interest as one of the first generation of buildings at Wisley, and embodies the RHS' commitment to education from the outset.
- 5.34 Importance to Setting: considerable, given it is located close to the Walled Garden and the Loggia.
- 5.35 Overall Significance: **considerable**.

### *The Jellicoe Canal*

- 5.36 Outline history: Sir Geoffrey Jellicoe's principal contribution to the Wisley dates from 1970 when design work on the Canal started. It occupies the former site of a large complex of greenhouses which stood here for much of the 20<sup>th</sup> century. Jellicoe was assisted by Lanning Roper (1912-83), the American-born landscape architect who worked for the RHS during the 1950s.
- 5.37 Architectural and artistic interest: considerable. The formal neo-Baroque monumentality of the design contrasts effectively with the very different character of the rest of the garden.
- 5.38 Historic Interest: considerable, showing the ambition of the RHS in re-presenting the Wisley design at this point, and by including an example of the leading 20<sup>th</sup> century British garden architect's work.
- 5.39 Importance to Setting: considerable. The Canal is the most monumental element of design at Wisley and has an architectural presence through its alignment with the Loggia and The Laboratory.
- 5.40 Overall Significance: **high**.

### *The Bowes-Lyon Pavilion*

- 5.41 Outline history: opened in 1964 to honour the Hon. Sir David Bowes-Lyon, president of the RHS 1953-61 (and younger brother of Queen Elizabeth the Queen Mother); its designer was Derrick Lees.
- 5.42 Architectural and artistic interest: moderate. The structure is a lightweight pavilion of teak comprising six octagonal shallow domes carried on eight slender uprights.
- 5.43 Historic Interest: moderate. Of some commemorative interest for honouring a prominent RHS figure. Its adoption of a lightweight modern design approach is of some cultural interest.
- 5.44 Importance to Setting: considerable. It is prominently sited on one of the principal routes through the garden and highly visible.
- 5.45 Overall Significance: **moderate**.

### *The Former Fruit Exhibition Room and Bulb Store*

- 5.46 Outline history: this was built in c.1927 as a fruit exhibiting and bulb store shed. It was later converted to office use and became absorbed in the plant centre. In recent times the building's surroundings have been cleared away and it once more stands in the centre of cultivated ground which will become test beds once more.
- 5.47 Architectural and artistic interest: considerable. A characteristic garden building, its waney-edged planking and tiled roof recalling the rural Surrey tradition. Such modest buildings of timber construction are prone to clearance elsewhere.
- 5.48 Historic Interest: high. Although its original function was an operational one, growing plants is what Wisley is all about. It is now a rare survival: in the words of the 2019 Conservation Plan, 'It is one of the last remaining, if not the last, purpose-built horticultural buildings from the early history of the site' (p. 102).
- 5.49 Importance to Setting: considerable. It is situated close to the principal buildings, and is soon to have its planting bed surrounds restored, the structure is readily seen and lends an operational gardening note to the more formal buildings nearby.
- 5.50 Overall Significance: **considerable**.

# APPENDIX 5.0

## ANNEXE 0 OF PINS PROCEDURAL GUIDANCE – WHAT IS EXPERT EVIDENCE?



## Procedural Guide

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### Planning appeals - England

This Guide applies to

- planning appeals;
- householder development appeals;
- minor commercial appeals;
- listed building appeals;
- advertisement appeals;
- discontinuance notice appeals.

July 2020

# PROCEDURAL GUIDE

## PLANNING APPEALS – ENGLAND

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## **O What is “Expert evidence”?**

### **O.1 Who provides expert evidence?**

O.1.1 Expert evidence is evidence that is given by a person who is qualified, by training and experience in a particular subject or subjects, to express an opinion. It is the duty of an expert to help an Inspector on matters within his or her expertise. This duty overrides any obligation to the person from whom the expert has received instructions or by whom he or she is paid.

O.1.2 The evidence should be accurate, concise and complete as to relevant fact(s) within the expert’s knowledge and should represent his or her honest and objective opinion. If a professional body has adopted a code of practice on professional conduct dealing with the giving of evidence, then a member of that body will be expected to comply with the provisions of the code in the preparation and presentation (written or in person) of the expert evidence.

### **O.2 Endorsement**

O.2.1 Expert evidence should include an endorsement such as that set out below or similar (such as that required by a particular professional body). This will enable the Inspector and others involved in an appeal to know that the material in a proof of evidence, written statement or report is provided as ‘expert evidence’. An appropriate form of endorsement is:

*“The evidence which I have prepared and provide for this appeal reference APP/xxx (in this proof of evidence, written statement or report) is true [and has been prepared and is given in accordance with the guidance of my professional institution] and I confirm that the opinions expressed are my true and professional opinions.”*

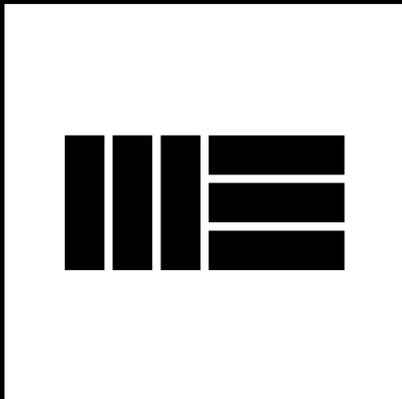
O.2.2 Giving expert evidence does not prevent an expert from acting as an advocate so long as it is made clear through the endorsement or otherwise what is given as expert evidence and what is not.

# APPENDIX 6.0

RHS WISLEY VISITOR PROJECTIONS TO 2024 -  
EXTRACT FROM COUNTER CULTURE (REP3-052)

<b>VISITOR PROJECTIONS</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
<i>Original Projection</i>	1,071,000	1,252,000	1,313,000	1,379,000	1,427,000	1,470,000	1,494,000
<i>DCO Scheme</i>	1,071,000	1,252,000	1,281,000	1,245,000	1,270,000	1,327,000	1,394,000
<i>RHS Alternative</i>	1,071,000	1,252,000	1,281,000	1,245,000	1,270,000	1,327,000	1,457,000

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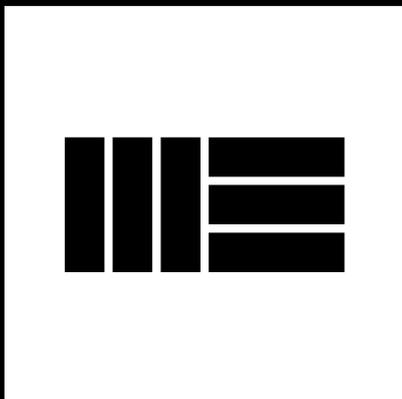


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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.  
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.

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