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Research - Conserve - Campaign

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Dear Mr Lewis,

Ref: 18/00825/HYBRID – Amendments - A hybrid planning application; Heyford Park, Camp Road, Upper Heyford, Bicester OX25 5HD

Thank you for consulting The Gardens Trust (GT) in its role as statutory consultee regarding proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. We have liaised with our colleagues in the Oxfordshire Gardens Trust (OGT) and would be grateful if you could take our comments into consideration when deciding this application.

The Grade I Rousham landscape is of national and international significance and is regarded as the most complete surviving example of an early 18<sup>th</sup> century landscape designed by William Kent. Within the Rousham landscape and its setting, the house itself is listed Grade I and there are in excess of 70 other buildings, statues, walls, structures etc which are listed. The significance of the combined designated heritage assets is amplified by the almost unparalleled amount of them, and should, in our opinion, be considered as a single entity as far as significance is concerned. A negative impact on any one of these assets, correspondingly affects the significance of the whole, as well as individually.

A key aspect of Kent's design was using the countryside beyond the site to provide extensive picturesque views including north and north-east across the water meadows and Heyford Bridge to nearby villages, focal points such as the church towers at Steeple Aston, Lower & Upper Heyford and to eyecatchers or tree clumps which he created. The tranquillity of the rural setting and timeless quality of the Rousham landscape, complete with its pleasure grounds, temples, statues and riverside walks are a fragile resource and of the highest significance in terms of the evolution of the naturalistic garden and English landscape design.

The GT/OGT wish to lodge a holding **objection** to the amended proposals, including re-location of sports development and 30m high observation tower with zip-wire, pending further details and clarification of the impacts on views and the setting of the Grade I Rousham landscape.

NPPF para 194 states 'Any harm to, or loss of, the significance of a designated heritage asset ... or from development within its setting ... should require clear and convincing justification.'

Cumulative impacts of features such as features such as towers on the skyline can impact negatively and harm views. Your officers will be familiar with Historic England's The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), pub 2<sup>nd</sup> Dec 2017, Part I – Settings and Views. 'When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change.' (p2) Also relevant: (p5) 'development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary' and lastly (p12) 'Cumulative assessment is required under the EU Directive on EIA. Its purpose is to identify impacts that are the result of introducing the development into the view in combination with other existing and proposed developments.'

The LVIA should be revised and expanded to identify, assess and illustrate impacts from key viewpoints identified in the Rousham Conservation Area Appraisal, Para 9.2 (September 2018), and photomontages provided without tree leaf cover, of development over 10.5m (to comply with NPPF Para 189). Such view-points include from the Horse & Lion statue on the north of the Bowling Green, the Dying Gladiator above Praeneste, as well as from Townsend's Temple and various view points along the riverside walk.

Causewayed Heyford Bridge, a Grade II\* structure of medieval origin, prominent on the main B4030 east/west route within the setting, and contributing to key views from Rousham, is potentially impacted by the increase in traffic. OGT seeks clarification of the safeguarding of this structure in the provision of a structural survey/repair schedule of Heyford Bridge.

In addition the GT/OGT seeks clarification of details to minimise harm to the Rousham landscape and its setting from traffic, noise and light pollution (sky glow, glare and light intrusion) in the provision of a Traffic Infrastructure Appraisal and Management Plan, Lighting Report and Tree/Woodland Planting Plan.

The GT/OGT has also considered the potential impacts of proposals on Middleton Park. We consider that due to the siting of the development and the intervening wood, there will be no impact upon the RPG.

We would be pleased to offer further comments once additional details are received.

Yours sincerely,

Margie Hoffnung Conservation Officer