

Dear Sirs

TURVEY NEIGHBOURHOOD PLAN: REGULATION 14 REPRESENTATIONS

I am writing on behalf of the Trustees of the Turvey Estate and Turvey House Maintenance Fund, in response to the Regulation 14 consultation draft of the Turvey Neighbourhood Plan. As you will likely be aware, the Turvey Estate is a considerable landowner in the local area and has responsibility of the management and maintenance of Grade I Listed Turvey House and its wider parkland, which itself was designated as a Registered Park and Garden in November 2016. Our client has concerns that the submitted Plan and its proposals do not adequately protect these historic assets, particularly having regard for the proposed allocation of land adjacent to these assets on Carlton Road. The Trustees object to this Plan and request that the proposed allocation on Carlton Road is deleted.

Policy Context

Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 sets out that Neighbourhood Plans must pass a number of 'basic conditions' if it is to proceed to Referendum. The first basic condition and the one of most relevance to these representations is:

- A) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Neighbourhood Plan

The Planning Practice Guidance confirms that the NPPF is the primary policy document setting out the government's planning policies for England and how these are to be applied. With regards to the protection of historic assets, the NPPF has a dedicated chapter on the matter, Chapter 16: Conserving and enhancing the historic environment. Paragraph 193 states:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

Paragraph 194 continues by stating "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification". The NPPF Glossary describes the setting of a heritage asset 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." The Planning Practice Guidance outlines at Paragraph 13 that while setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations, there are other factors that must be considered when assessing the impact of development on a heritage assets setting and the way people experience it. This includes environmental factors and, importantly, historic or aesthetic connection, that amplifies the experience of the significant of each.

It should be noted that the above is in addition to the statutory protections afforded to Designated heritage assets.

Historic Context

Turvey House is a Grade I Listed country house, located north of the village of Turvey, between Carlton Road and the River Great Ouse. Grade I is the highest grading given to listed buildings and only 2.5% of the listed buildings in England are designated as such. It was listed in May 1952, and therefore has benefited from longstanding protection.

Turvey's parkland has now also been listed and is thus a registered parkland (Grade II) recognising the importance of the parkland to the contribution to setting of Turvey house. The Registered Parkland is also a historic asset on itself; the setting for which also needs to be considered. The reasons given for the designation are explained by Historic England, but have been summarised below:

- High quality designed landscape dating from late c18 or early c19.
- High historic interest
- High Level of survival
- Group Value, with Turvey House, Church of All Saints, Higgins Family Mausoleum, Bottom Lodge, Top Lodge and Turvey Bridge
- Documentation relating to its design remains

Planning Considerations

The Trustees have concerns with the lack of evidence base used to support the allocation at Carlton Road. The AECOM report which the Neighbourhood Plan Group commissioned states that a heritage assessment would be required to consider the impact of development at Carlton Road on heritage assets. Whilst this could be inferred to mean with any subsequent application, given the importance of the heritage asset in close proximity to the site adjacent to a designated asset and the potential harm arising from development of this site, we consider it is necessary as an integral part of the Plan making process. Moreover, evidence which has been shared with the Trustees, from qualified and respected historic consultants Orion (attached to this letter) indicates that development of the site would "impact significantly upon the setting" of the registered parkland associated with Turvey House and Turvey House itself.

The Heritage Assessment completed by Orion states at 5.7:

"There is high potential for development of the site, along with any associated footway and carriageway alterations, to impact on the setting of the Grade II Listed Historic Park and Garden to Turvey House (New Park) and four Listed Buildings which lie within it that are located directly adjacent to the site, on the opposite side of Carlton Road to the west. There are direct views from the site towards these designated heritage assets. **As such, it is considered that development would have a significant impact on them**" [our emphasis].

It continues at 5.8:

"views from, towards and through and across New Park and Turvey House would be materially impacted upon by development of the site, as a result of the associated change in

character of the site and intervisibility that this would bring. **This would result in harm to the significance of a Grade I Listed building and associated heritage assets”** [our emphasis].

Paragraph 193 of the Framework is clear that when considering the impact of proposed development, greater weight should be applied to the conservation of more important assets. As a Grade I Listed Building therefore, significant weight should be afforded to the conservation of Turvey House. There is no recognition of this by the Steering Group in the evidence available to support the Neighbourhood Plan. Furthermore, there is no justification provided for the allocation of the site as required by Paragraph 194 of the Framework.

Whilst the Neighbourhood Plan Group clearly consider that a 30 metre landscape buffer can mitigate the adverse impacts of development, the Trustees do not consider this to be the case and that it shows a lack of understanding by the Group of the qualities and significance of the setting of these registered assets. The proposed landscape buffering would reduce the openness and create a physical boundary between the house and gardens and agricultural land of which it has a tangible historic association. Moreover, by virtue of the access road needed to access the development, a large area of the landscape buffer will need to be left open to allow the road to pass through, meaning modern development will be visible from both the gardens and Carlton Road itself. The proposed allocation will serve to urbanise the currently open land adjacent to the registered parkland and within the setting of a Grade I Listed Building with a detrimental impact to both.

Conclusion

Whilst this allocation remains, we consider the Plan cannot proceed as it does not comply with the requirements of the NPPF. The proposed allocation at Carlton Road will have significant impacts on important heritage assets, including a Grade I Listed house, with no evidence or justification for the approach taken. This is in direct contradiction with the Framework, particularly Paragraph 194. Having regard for this, it fails the first basic condition which requires Neighbourhood Plans to accord with policies contained within the Framework. To enable the Plan to continue, the allocation at Carlton Road must be removed.

I trust the contents of this letter are clear, however if you have any questions do not hesitate to contact the author on the details provided below.

Yours sincerely,

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