

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Local Plan Update
Date: 27 January 2025 11:37:54
Attachments: [REDACTED]

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Dear Sir/Madam

Thank you for consulting the Berkshire Gardens Trust. I am pleased to attach comments on behalf of the Berkshire Gardens Trust; and the Gardens Trust, who are a Statutory Consultee.

Please continue to include us on your list of consultees and let us have any updates.

Yours faithfully Bettina Kirkham [REDACTED]
Chair and Planning Advisor
Berkshire Gardens Trust



West Berkshire District Council

[REDACTED]

[REDACTED]

27 January 2025

Dear Sir/Madam,

West Berkshire Borough Local Plan 2022-2039 Proposed Submission January 2023

Comments from Berkshire Gardens Trust

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed West Berkshire Local Plan Update as it affects sites listed by Historic England (HE) on their Register of Parks and Gardens and those locally listed. The Berkshire Gardens Trust (BGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of historic sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations within Berkshire.

One of the key activities of the Berkshire Gardens Trust (BGT) is therefore to help conserve, protect and enhance designed landscapes within West Berkshire. Our responses concern the policies affecting historic environment, in particular the parks and gardens of the District.

We fully support Policy SP9 and welcome the separation of this policy on the historic landscape from Policy SP8 on Landscape Character which, although interlinked, are governed by different sections of the NPPF and need to address different concerns. We are also very pleased to see both Policy DM11 and DM12. However, we are concerned about the wording at the beginning of DM12 i.e: *Proposals for development that could affect designed landscapes identified on the 'Register of Historic Parks and Gardens of Special Historic Interest in England' (Registered Parks and Gardens) will be required to be sensitively designed and clearly demonstrate that great weight has been given to the*

conservation and significance of the asset and its setting in accordance with Policy SP9. By placing the requirement to meet SP9 at the end, the wording weakens the policy for these most important assets.

We would like to see this part of the policy revised to: *Proposals for development that could affect designed landscapes identified on the 'Register of Historic Parks and Gardens of Special Historic Interest in England' (Registered Parks and Gardens) and/or their settings will be required to be in accordance with Policy SP9. Where acceptable under SP9, proposals for development will be required to demonstrate a clear understanding of the significance of the asset and/or its setting, alongside an assessment of the potential impact of the proposal on that significance and should be undertaken in a sympathetic manner using highest quality design.*

There is clearly a strong inter-relationship between Historic parks and gardens and the GI of the District and we are pleased to see this recognised in SP10 under the supporting text. We are also pleased to see item j) in the list of criteria but would like to see an additional criterion on the lines of: *Protect and enhance the historic significance of the parks and designed landscapes and their individual heritage assets and help to improve understanding of their historic significance.*

We would very much like to see a *list of locally listed non-designated historic parks and gardens* within the District. We note that the WBDC HER records do not classify the type of asset, for example whether it be a 'park or garden' or 'building'. Nor is there a comprehensive list within the Local Plan which includes a random selection under paras 10.99 and 10.100. Where possible, within our limited resources of volunteers, we will do what we can to provide further information on non-designated historic parks and gardens but we would very much welcome a commitment from the Council to build on the current HER record, as befits the importance of WB Heritage Assets and their settings in the western half of the former Royal County of Berkshire.

Yours sincerely,

Bettina Kirkham

