

Objection to planning application 18/2977/FUL (Marble Hill Park)

English Heritage's (EH's) Proposals for Marble Hill Park contravene the following planning policies [italics mine]:-

LBRUT Local Plan

Policy LP 5. Views and Vistas

The Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means ... *resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline.*

National Planning Policy Framework (2018)

Para. 194(b). Substantial harm to or loss of ... assets of the highest significance, notably ... grade I and II* registered parks and gardens, and World Heritage Sites, *should be wholly exceptional.*

EH's proposals also contravene their own organisation's policies (See Appendix).

Background

The nature of the garden area in the 18th century is hotly disputed with evidence of four quite different designs in this period. What is certain is that the 18th century garden was replaced in Victorian times with an Italianate garden and this in turn was replaced in the early 20th century with a simple design, including a beautiful Capability Brown style panoramic vista across the south lawn.

The current character of the park is, of course, due to the acquisition in 1902 of what had been a private estate by London County Council. Aerial photographs after that date all show the same landscape that exists to this day. Rugby and football pitches were an early addition to the public park and these blend in beautifully with the long "Brownian" east-west and west-east vistas across the southern section of the park. This is one of the most beautiful aspects of Marble Hill Park.

There is also an iconic south-north vista towards Marble Hill House seen from the Twickenham towpath and also from the Richmond bank. As part of the Thames Landscape Strategy this site is of more than local interest (although EH consulted only with local residents).

Marble Hill House and Park are listed Grade I and II* respectively. The Park was listed in 1987. Marble Hill is a "multi-phased site" as defined by EH: "The value of a site can rest in the very fact its present form is the outcome of a series of phases of development or of a more or less continuous sequence of change ... With such sites, it is the sum of the developments as seen in the landscape today which is considered" (English Heritage, *Register of parks and gardens: an introduction*, 1988).

South-North Vista

The House and south lawn are visible from Warren Footpath and also from the Richmond bank. The current "V" shape of the treeline running from the house to the river is a kind of *trompe l'oeil* that exaggerates perspective and makes the lawn, viewed from the towpath and the Richmond bank, appear grander than it is (Figs. 1 & 2) This effect will be completely lost if EH's proposals are implemented.



1. Iconic vista towards House from Richmond bank showing *trompe l'oeil* exaggerated perspective.



2. The lawn mower marks show the true perspective.

East-West, West-East Vistas



Fig. 3. West-East “Brownian” vista towards the football pitches.



Fig. 4. East-West “Brownian” vista towards rugby pitches.

Fig. 5 below is EH's misleading image of the proposed elevation for the south lawn, showing a single row of smaller trees with a columnar shape and their lower branches pruned. In reality there will be at least eight *staggered* ("quincunx") rows of small trees at eye level with spreading growth and minimal pruning of lower branches. These will obliterate the current panoramic vista, allowing only tiny diagonal glimpses between the small trees. It is disingenuous of EH to suggest otherwise.



Fig. 5.

Two other images of the proposed garden area for the south lawn show the reality: two banks of dense tree planting (bottom). It will be decades before the new tall trees can have their lower branches pruned. However, that hardly matters because the small trees at eye level, represented by the smaller dots, will block any views under the branches of the tall trees:-



Figs. 6 & 7.

EH's plan will divide the southern lawn into three sections effectively cut off from each other (Figs. 6 & 7). The very formal style of tree planting (of 17th century French origin) was obsolescent even in Henrietta Howard's time and it is anathema to contemporary taste. Heritage is what survives from the past and is cherished by the community. The existing landscape is our true heritage. Landscapes that have been consigned to the dustbin of history are just that – history. To re-create them is fake heritage, a garden historian's fantasy.

APPENDIX

English Heritage (Historic England) *Conservation policies and guidance* (2008)

DEFINITIONS: "Restoration": To return a place to a known earlier state, on the basis of compelling evidence, *without conjecture*.

[*EH's historical narrative is based on circumstantial evidence and conjecture*]

Para. 130. Restoration may, however, bring gains by revealing other heritage values, such as the integrity and quality of an earlier and more important phase in the evolution of a place, which makes a particular contribution to its significance. Careful assessment of the values of the elements affected is essential. *Where the significance of a place is the result of centuries of change, restoration to some earlier stage in its evolution is most unlikely to meet this criterion.*

[*As explained in "Background" above, Marble Hill has evolved over three centuries from a stately home into a local public park*].

Para. 132. Judgement is needed in determining the level of information specific to the place required to justify restoration. For example, *reinstatement of an historic garden requires compelling evidence of its planned layout and hard materials.*

[*A c.1750 map includes what EH are claiming is a "survey" of an existing garden. In reality it is clearly a plan for a projected future garden that may never have been fully implemented*].

Para. 136. *The more radical the restoration, the more likely it is to introduce an element of incongruity.* The reversal of relatively minor but harmful changes, to restore a place to a form in which it recently existed as a complete entity, is unlikely to contradict this criterion. *By contrast, the restoration of isolated parts of a place to an earlier form, except as legible elements of an otherwise new design, would produce an apparently historic entity that had never previously existed, which would lack integrity.*

[*17th century geometric formality is incongruous where there is now "Brownian" informality and sports pitches*].

Par. 161. Balanced and justifiable decisions about change in the historic environment depend upon understanding *who values a place and why they do so*, leading to a clear statement of its significance and, with it, the ability to understand the impact of the proposed change on that significance.

[*Heritage is what survives from the past and is cherished by the community. The surviving Capability Brown style panoramic vistas and the trompe l'oeil perspective created by the existing trees are our true heritage.*]

RON McEWEN, 12D CHURCH ROAD, RICHMOND, TW9 2QA