

26th October 2018

Dear Mr Garside,

Re: 18/2977/FUL

Love Marble Hill would like to object to the above planning application on the basis of the following:

1. Marble Hill Park is a grade II \* listed landscape. The proposed changes to the historic landscape, to install landscaped elements which never existed (see document "Love Marble Hill: challenging the landscape history of Marble Hill Revived"), are contrary to National Planning Policy Framework.

National Planning Policy Framework for Grade II\* landscapes states:

**16. Conserving and enhancing the historic environment**

*Para 194. 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**.*

*Substantial harm to or loss of:*

*(a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

*(b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, **grade I and II\* registered parks and gardens**, and World Heritage Sites, should be **wholly exceptional**.*

Love Marble Hill argues that English Heritage's conclusions with respect to the historic landscape have been arrived at using evidence that does not meet the standards of the above criteria.

Re-landscaping should not be permitted in the absence of research that demonstrates "beyond all reasonable doubt" (Alex Sydney, English Heritage's Head of Investment) the existence of a "lost transitional garden."

2. Detrimental effects of the proposed landscape development.

With once again reference to the National Planning Policy Framework for Grade II\* landscapes:

*Para 195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, **unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.***

(i) Loss of openness -the east-west vista

Marble Hill Park, as distinct from Marble Hill House, was registered Grade II\* in 1987. The park is the product of three centuries of evolution, to include the east-west vista currently a feature of the lower section of the park.

The proposed substantial tree-planting programme in the lower section of the park, dividing the south lawn from other areas of the park, will compromise the openness of the park created by this east-west vista.

The open nature of the park itself is a public amenity worth protecting.

(ii) Compromising public safety in a public park

The above-mentioned open nature of the park promotes public safety. Lone joggers and walkers can be assured by the park's openness. The proposed new multiple tree lines and large hedged palisades will create areas of 'enclosure'.

(iii) Restricting views of and from the River Thames

The proposed tree-planting programme, which will see several additional rows of trees added either side of the lawn to the south of the house, will restrict views both from the park to the river, and from the river of the park.

(iv) Loss of historic woodland quarters and destruction of wildlife habitats

The proposed removal of the mid-18th century woodland quarters will lead to the loss of one of the few remaining true historic landscape landmarks in the park.

Moreover, the destruction of the scrubland habitat contained therein will cause significant harm to protected species, to include protected species such as the red-listed song thrush, badgers and their setts, and several species of bat.

Historic England's official listing for Marble Hill Park states that the quarters are "enclosed within wooden palisade fencing; these are left unmanaged to

allow for the development of wildlife habitats". (<https://historicengland.org.uk/listing/the-list/list-entry/1000400>).

The decision to leave the woodlands unmanaged was a considered one and should not now be a motive for their destruction.

### 3. Impact on local parking availability.

The onsite car park will be stressed during weekends and high season.

There already exists a local problem with the availability of on-street parking. The predicted increase in visitor numbers will compound this.

The Transport Assessment that accompanies the application shows visitors to the House parking and leaving the car park before the House has even opened. Similarly, they are shown to arrive after the House has closed, park for a couple of hours and then leave. If House visitors were not to behave in this inexplicable fashion (i.e. their arrivals and departures spread out over many hours), then the onsite car park would be more than 100% full.

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We urge you to reject this application on the basis of National Planning Policy Framework based on (1) lack of historical evidence for the proposed "restoration" and (2) harm caused outweighing any perceived public benefit.

With our best wishes,

Janine Fotiadis-Negrepontis (Tanglewind, Riverside, Twickenham TW1 3DJ)  
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representing *Love Marble Hill*