



Historic England

LONDON OFFICE

Mr James Garside
London Borough of Richmond Upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Direct Dial: -

Our ref: P00970890

13 November 2018

Dear Mr Garside

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**MARBLE HILL HOUSE MARBLE HILL PARK RICHMOND ROAD TWICKENHAM
TW1 2NL**

Application No. 18/2977/FUL

Thank you for your letter of 17 September 2018 regarding the above application for planning permission. Further to our letter dated 25 September 2018, in which we originally offered 'no comments', we are writing again to offer the following comments specifically on the landscape proposals to assist your authority in determining the application.

Summary

This application for Marble Hill Revived includes an historic landscape restoration which will reinforce and restore the surviving structure and elements within the most significant parts of the early-to-mid C18 garden and park around the house and between the house and the river. We consider that this will result in considerable heritage and other public benefits which will enhance the grade II* registered park and garden. Historic England supports the application on heritage grounds.

Historic England Advice

Significance

Marble Hill is a complex, multi-layered designed landscape, presently and urban park, which contains the remains of a C18 garden and park created by Henrietta Howard, Countess of Suffolk, between 1724 and 1771 and associated with some of the period's leading proponents of garden design and key figures in the history of designed landscape, including Alexander Pope, Charles Bridgeman, and Archibald Campbell, Earl of Ilay (and later 3rd Duke of Argyll). The garden and park were focussed on Howard's Marble Hill House (Grade I; LEN: [1285673](#)), constructed in the Palladian style between 1724-29 by Lord Herbert and Roger Morris. The site contains numerous features which survive from the early-to-mid C18, including earthwork terraces, brick ice house (Grade II; LEN: [1194472](#)), oval lawn, grotto, pleasure ground woodland



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quarters, the Sweet Walk, and areas of former parkland/meadows (now playing fields), as well as traces of other features such as the . To the west of the house is the early C19 two-storey brick stable building (Grade II, LEN: [1357725](#)), and to the north of the house is the late C18/early C19 single storey entrance lodge (Grade II; LEN: [1250209](#)). Although softened and obscured due to the passage of time and historic lapses in management, the extents, layout and many features of the Howard-era garden and park remain discernible, serving as a rare surviving example of an early C18 villa landscape which bridges the gap between the formal gardens of the late C17 and the more naturalistic landscape gardens of the mid-C18 and later. This significance is recognised in the site's inclusion in Historic England's *Register of Parks and Gardens of Special Historic Interest at Grade II** (LEN: [1000400](#)), which places it within the top 30% of all Registered Parks and Gardens and reflects a level of exceptional historic interest.

Impact of the proposals

The Marble Hill Revived proposals include an historic landscape restoration which will reinforce and restore the surviving structure and elements within the most significant parts of the early-to-mid C18 Howard-era garden and park around the house and between the house and the river. The proposals are based on the c1749 survey of the site by James Dorrett, surveyor to the Earl of Illy, and are supported by extensive research which has been subject to independent external review by experts in 18th century gardens and landscape design.

The EHT's proposals for the woodland quarters are set out as a phased and considered approach seeking a balanced approach between historic landscape restoration and nature conservation. The proposed management will ensure continuity and legibility of these features within the historic landscape through healthy tree management to rejuvenate the woodland, protect historic trees, provide for tree succession and improve diversity and richness in texture and experience reflecting the original design intent. As such, a number of existing mature ornamental and non-native trees will be retained and included within new tree and shrub planting, particularly around the icehouse and grotto, reflecting the planting styles and palette of the early-to-mid C18. Ensuring continuity of such species amongst the tree and shrub layers within the historic designed landscape at Marble Hill will both conserve and enhance the registered park and garden.

The proposals for replanting the double avenues and open groves between the woodland quarters and the river will restore the formal structure of the view between the house and river, which represents a considerable heritage benefit in terms of enhancing both the registered park and garden and the setting of the house. The specified sizes and generous spacing of this new tree planting should enable retention of the existing generally open character and views between the Pleasure Grounds and the East and West Meadows.



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The proposals include removal of elements within the existing landscape which are unsympathetic and/or inappropriate to the character and period of the C18 landscape, such as modern fencing and the C20 Chinese-style shelter. At the same time, new elements such as children's play features have been sited with sensitivity to the character and views within the historic landscape.

The historic landscape restoration and other landscape proposals form a significant and integral part of the wider rejuvenation of the site through the Marble Hill Revived project. This includes a costed 10-year management and maintenance plan for the site as well as new staff posts such as a Head Gardener which should provide sufficient safeguards to ensure maintenance and upkeep of the newly restored landscape elements as well as an improvement to on-going proactive management across the entire site.

Policy Context

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1).

The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to achieve sustainable development and that protection and enhancement of the historic environment is an overarching objective in this (paragraphs 7 and 8). The NPPF identifies that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 184). Paragraph 189 of the NPPF requires applicants to provide sufficient information on the heritage assets affected by the development to allow assessment of that development on their historic significance. Paragraph 192 of the NPPF states that when determining applications local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to a viable use consistent with their conservation. Paragraph 193 also states that 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), irrespective of the level of harm. Paragraph 194 states that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. Paragraph 200 also states that the Council should favour those proposals for development which preserve those elements of setting that make a positive contribution to the heritage asset or better reveal its significance.

Recommendation

Historic England supports the application on heritage grounds.

We strongly support the proposed historic landscape restoration as part of the Marble



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Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely,



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cc



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Yours sincerely,



Christopher Laine
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