47 Denmans Lane
Lindfield
Haywards Heath
West Sussex
RH16 2JN

By e-mail to Horsham District Council
Matthew Porter
Parkside,
Chart Way, Horsham,
West Sussex RH12 1RL

14 March 2023

Dear Sir

DC/22/2229 Partly retrospective application for the construction of enlarged and rationalised existing car park and grassed enclosure for overflow car parking at Leonardslee, Horsham West Sussex RH13 6PP

Sussex Gardens Trust (SGT) commented on the above application on 17th January and our concluding paragraph was as follows:

> *While Sussex Gardens Trust welcomes these changes and recognises the need for additional carparking, the documents submitted do not provide sufficient evidence to justify approval. In particular there is still no* ***Conservation Management Plan*** *as advised by Historic England in their letter of 16th Sept 2021 nor a detailed* ***planting plan****. For these reasons, Sussex Gardens Trust continues to object to the application in its present form.*

Since then, the applicant has submitted further documents including

- A Conservation Management Plan & Gazetteer (CMP) for Leonardslee House and Gardens (Revision 1 – 22nd Feb2023) Donald Insall Associates accompanied by
- Conservation and Garden Management Plan (CGMP), Kenneth Cox, commissioned by Adam Streeter, Leonardslee Gardens 2020-21
- Planting Schedule Issues 01.02.2023

Our comments on these are shown below

The CMP by Donald Insall Associates follows the standard Historic England sector format and is stated as covering 'the entirety of the site' - house and gardens. In this capacity the plan includes the historic development of the site as a whole, sets out the general significances of the asset (following HE's guidance) and provides assessments and general conservation policies that apply to both buildings and gardens (under various headings: planning and legislation, accessibility and wayfinding, presentation, Education and Interpretation etc.). The level of survey information included on the gardens however is pretty limited - to a summary

and map of character areas while the detailed gazetteer is focused entirely on the house and buildings.

In a case such as this one would expect the Conservation and Garden Management plan (CGMP) to reflect and develop the format of statements of policy already set out in the CMP. This would then allow a reader (e.g. a manager or a LPA member) to have a clear understanding of how any proposal was supported by policies based on sound research and assessment. The CGMP doesn't do this at all well.

Even accepting that the CGMP is an 'evolving' plan', it currently muddles conservation issues and analysis with management policies in a way which makes it difficult to see how the former could robustly underpin the latter. Conservation principles that will have any meaning can only be established after the procurement and analysis of extensive, thorough and detailed historic research beyond that provided in the CMP. This should involve archival sources including historic maps, photos, plant records etc. plus full physical, visual and economic surveys (topographical, ecological, arboriculture, horticultural, aquatic, circulation/access, visitor profiles/income generation, etc. etc.). Currently the CGMP suggests only how some of these might be achieved. Lots of questions are posed but not many are answered.

Dealing with change is especially a problem without the 'conservation' part of the plan (as above) being completed. From the CGMP B2 'Managing change', it is difficult to see how the impact of change could be measured in any meaningful way without the requite baseline information. How for example would you measure the effects of a proposal on 'authenticity and integrity' of the historic site and its fabric if you haven't established what they are? The same applies to harming the values of the site – they need to be established first. There is much more to establishing the significance of the gardens than is currently demonstrated; more use should be made of the general significances set out in the CMP with further assessment given in detail to each character area (a gazetteer). It might also be arguable for the majority of the conservation material to be incorporated into the CMP, with a Garden Management Plan concentrating solely on management and maintenance. A discrete section should also be included to cover monitoring of implementation.

For a place of high heritage importance and a major visitor attraction like Leonardslee – and one having changed hands relatively recently following some years of perhaps uninformed and inappropriate management - a robust and comprehensive CMP is fundamental to managing its future. On current evidence (car park applications) and the owner's stated aims it is likely to be the subject of more change and development over the next decades and a sound CMP can go a long way to both ensuring change sustains the significance of the place and to easing the passage of change through the planning system, especially if consultation takes place with the LPA as the plan progresses. The same applies to consultation from an

early stage with local stakeholders: the more transparent the process the more likely proposals will be understood and supported.

SGT suggests that it would repay the cost of the services of a professional historic landscape consultant experienced in preparing conservation plans for historic parks and gardens who would work on integrating the two parts of the plan (CMP and CGMP) with the garden manager and Insalls as the CMP authors. This might be achieved either by Insalls appointing someone or as an independent commission. SGT is a voluntary charitable organisation and if requested could provide a list of suitably qualified professionals who could be considered for such work.

Planting in Car Park

It is noted that the carparks are not identified as character areas on the relevant plan in the CMP though they are the first part of the site that visitors will experience. In the absence of any policy for how (and why) they should look, SGT offers the following comment:

While the hedge reinstatement is welcome, the tree species proposed to break up the mass hard surface are very disappointing. While a few of the Sorbus might do, most of the other species are what we would class as small trees, while what is required here to counterbalance the vast car park and complement what is in character a woodland site are forest trees, or at least parkland trees, such as, say small-leaved lime, field maple, wild cherry, even a few replacement oaks.

Yours faithfully

Jim Stockwell.

On behalf of the Sussex Garden Trust

Copy to: The Gardens Trust

Jamie Harris, Head Gardener, Leonardslee