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Haywards Heath
West Sussex
RH16 2JN

Mid Sussex District Council
FAO: Joanne Fisher
Submitted by e-mail to: planninginfo@midsussex.gov.uk

18th March 2024

Dear Sirs,

DM/24/0433 BORDE HILL VISITOR AND COMMUNITY HUB AND OTHER WORKS

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. The Sussex Gardens Trust (SGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.

Summary

SGT was consulted in February 2022 during the preparation of a NLF bid and our comments are shown at the Annex attached. At that stage the level of detail provided was necessarily limited, but nevertheless the Trust largely welcomed and supported the proposals. We have not had the opportunity to be involved in community consultations since then. However, having carefully studied the detailed documents submitted with this application, the Trust's continuing support for this ambitious and creative project depends on a number of concerns being addressed. Firstly, a comprehensive Conservation Management Plan (CMP) (including a management section or separate Garden Management Plan) is essential, possibly by way of a condition of approval. Secondly, there will be some harm caused by both the Eco Lodge and the large increase in visitor numbers. Without mitigation, this harm could come close to significant harm. We have concerns regarding: (i) the Eco Lodge, particularly its bulk (which appears to be greater than previously envisaged in 2022), lighting and fenestration; and (ii) possible lighting within the Park itself and in the car park – ideally opening times should be managed to avoid the need for such lighting on safety grounds, and hence avoid visual and ecological harm to the tranquil rural atmosphere of the parkland at dusk.

Conservation Management Plan

Amongst other things, our letter from 2022 discussed the need for a Conservation Management Plan (CMP). It is pleasing to see the application is supported by an extensive range of survey, analysis, construction, sustainability and mitigation measures e.g. Arboricultural Impact Assessment & Method Statement, and much more comprehensive information on the site's history, character and significance, with accompanying conservation aims and policies. Also, good key policies:

> (i) To respect the historic integrity of Borde Hill and secure its long-term future
> (ii) To respect the importance of and secure the long-term survival of Borde Hill's botanically valuable collection
> (iii) To continue the Borde Hill tradition of evaluation and record keeping for the collection

Also good is the intention to carry out further data collection and cataloguing of the tree collection and its enhancement.

There are other documents referred to which are not part of this application which are pertinent to future management: for example, a 'Borde Hill Charity safeguarding plan' which seems to relate to safeguarding its tree collection? It will be helpful to document how woody plant data collection and cataloguing be undertaken (e.g. by whom and over what timescale) in a management plan.

What still seems to be lacking is a comprehensive 'working' standalone CMP, separate from but drawing on the planning documents, in which all the various documentation is brought together and which can be updated and amended in succeeding years. The greater intensity of use due to higher visitor numbers makes this particularly important.

Such a CMP should demonstrate a continuous thread of thought and purpose from defined significance, analysis of issues, creation of policies through to defined management policies. Management should include monitoring all aspects (this is addressed in the case of biodiversity, but in a separate Ecological Mitigation Enhancement and Monitoring plan). The CMP is fundamental to owners and staff (the latter will change over the years) to ensure a surviving understanding of the heritage asset and a joined-up approach to future management.

Eco Lodge and Lighting

The dimensions of the Eco Lodge, including roof canopy, appears to be approximately 30m x 12m which is larger than previously envisaged and quite prominent in the landscape, clearly visible from a wide range of locations within the park. This will cause some harm, and the lakeside setting makes it impossible to fully screen the structure.

Whilst the Design and Access Statement includes two photomontage images in dull twilight conditions in winter, the appearance will be quite different at other times when light is much brighter. All elevations of the Lodge include extensive large glass panels which are likely to reflect direct sunlight throughout the year and draw attention to the building, rather than allowing it to blend into its surroundings. The wide overhanging roof may help reduce reflections from the vertical surfaces when the sun is high, but when the sun is low, reflected sunlight is likely to cause harm. The roof lights are likely to reflect sunlight whenever the sun shines. So far as we can identify, this issue hasn't been evaluated. Could slats/shutters be fitted or tinted/non-reflective glass be used to help mitigate this issue?

The large glass windows will also cause an issue if internal lighting is used at twilight or when it is dark. Is it envisaged the Lodge will be used at such times and if so, can the problem be reduced by using shutters or blackout curtains?

Will any outside lighting be required on safety grounds along footpaths, the new areas and in the carpark? If so, the requirement and proposed design should be included with this application, together with a rationale for approach proposed. We can't find anything about this aspect in the documents provided. If no such lighting is required, that should be stated.

Conclusion

This is a bold and creative project which SGT continues to support in principle. However, this letter raises some issues which need to be addressed to help the project achieve its ambitions on completion and in the decades that follow.

Kind regards

Jim Stockwell
Trustee
On behalf of
Sussex Gardens Trust
Copy to: The Gardens Trust

SGT Letter of Dated February 2022

The National Lottery Heritage Fund
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To whom it may concern

Application from Borde Hill Garden West Sussex to the NHLF for a Round One Heritage project grant

Sussex Gardens Trust (SGT) has a long association with Borde Hill both through our events and education programme and our role supporting the Gardens Trust as the statutory consultee on planning matters in registered historic parks and gardens.

SGT is therefore pleased to be invited to respond to Borde Hill's Round one bid for a new heritage-based project focused on two principal aims:

1. 'Engaging a wider audience with nature' with a specific focus on the local community which does not have easy access to open space

2. Contributing to Borde hill's long-term sustainability.

On the basis of necessarily-limited information at this early stage, SGT largely welcomes and supports the proposals.

We are especially supportive of the cycle and pedestrian route linking the visitor reception area with Haywards Heath station which will meet a significant sustainability target.

We also believe that the emphasis on education with the proposals for learning and community engagement will be highly valuable to both the existing and new communities being developed in the surrounding area. We welcome the proposed new members of staff, new body of trained volunteers and the Horticultural Apprenticeship.

We support the Growers Community Garden and propagation project's twin aims of sustaining Borde Hill's unique plant species and offering opportunities for horticultural skill development which could increase the pool of trained staff available to garden and estate owners. Partnering a Sussex-based horticultural college might be a possibility to explore.

It is reassuring that the proposals are aimed at future-proofing Borde Hill's South Park as valuable open space with a still-rural character. Much of the surrounding areas are slowly but relentlessly becoming swallowed up by the growth of Haywards Heath. Just across Hanlye Lane a major housing development has just been completed on land at Penland Farm SGT was instrumental in pressing for tree screens to protect views out of South Park. There is currently another huge development being considered to build on Haywards Heath Golf Course less than half a mile away).

Mention is made in section 5 para 3 of the Bid that ''*Three distinct character areas … were identified in an earlier Conservation Management Plan (CMP) which is to be updated'.* SGT has

not seen this CMP nor are we aware of any Statement of significant for the site. While we agree that the three distinct character areas are properly identified we would like to see the CMP, updated if necessary and with a statement of significance for the South Park, underpinning and informing all the bid's proposals.

Although South Park has been considerably altered with the late C20 lake and the extensive visitor car park - and may be considered of less scenic importance than the North park - it is still fine parkland and within the AONB.

Physical proposals here are wide-ranging comprising built structures with attendant landscaping, lighting, signage etc. but there is insufficient information at this stage for us to comment usefully. However, we would be looking for a scheme the scale and detailed design of which would not outweigh the potential harm to the park's scenic and historic features and character.

We note that while additional car-parking has been excluded from this bid, surely the business case will require such a facility. The plan on page 1 indicates a new parking area to the east of Borde Hill Lane, outside the registered park (presumably to serve the 'Eco' lodge?) reasonably well screened by existing trees/shrubs. This would be more acceptable from our viewpoint than extending the existing car park but we anticipate traffic safety concerns which would need to be overcome.

In conclusion, notwithstanding the above caveats, Sussex Gardens Trust warmly welcomes and supports the proposals and will be happy to contribute or assist Borde Hill in the further development and refinement of the project in any way we are able.

As a final thought would the USP of the project not be better captured by 'Revealing Borde Hill' rather than 'Reinventing' it? It's very special designed historic landscape the legacy of which has been conserved by the present owners is recognised by its II* grade on Historic England's National Heritage list for England. That is surely the key aspect worth unlocking and sharing with the wider community audience the project seeks.