

The National Trust London & the South East Region Hughenden Manor and Park

Matter 7: Development Framework - High Wycombe 1. Are the following allocations soundly based and is there evidence that the development of the sites is viable and deliverable?

Matter 7 (f) HW9 - Part of Greens Farm, Glynswood, Green Hill, High Wycombe;

13th August 2018

1.0 Introduction and overview of case

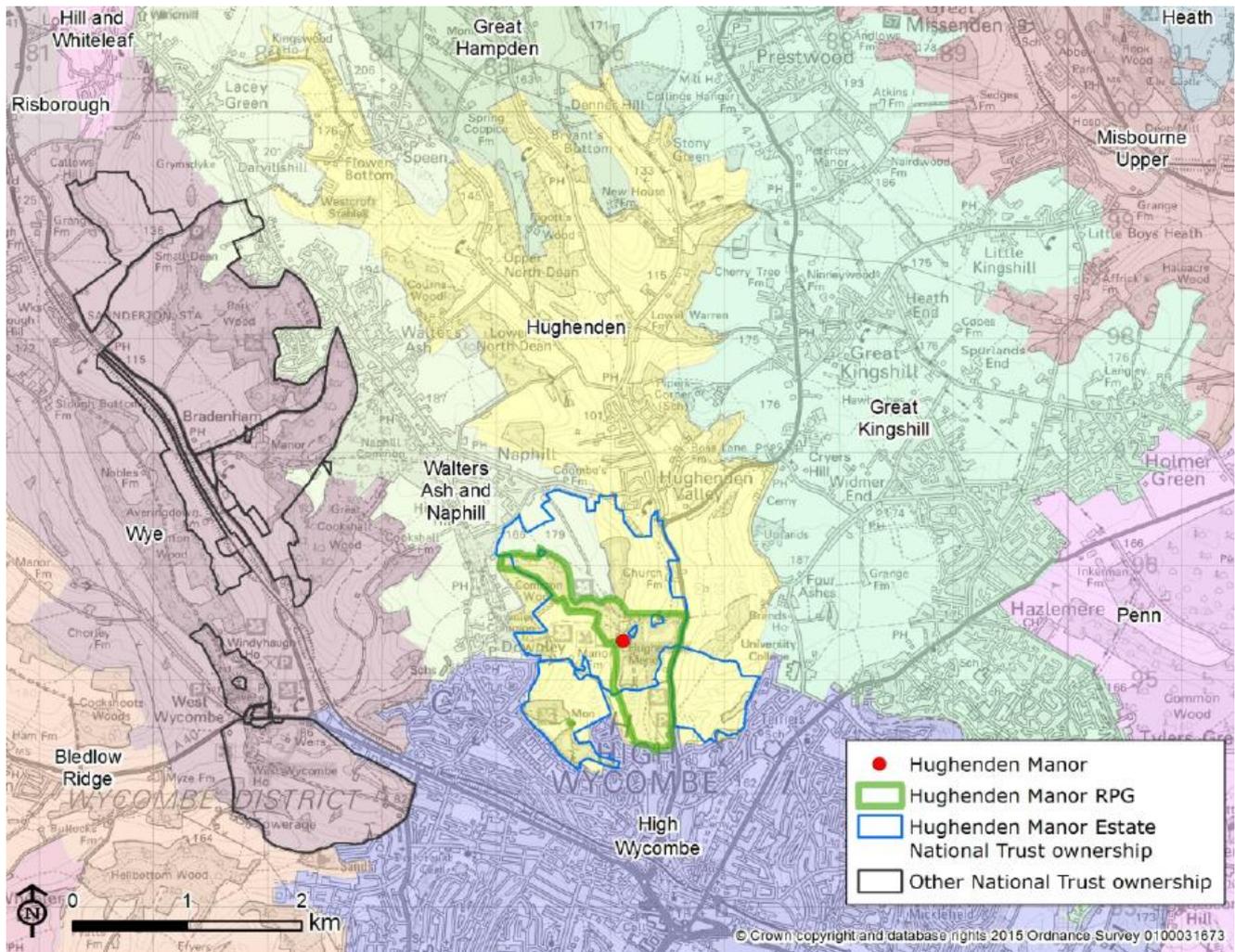
1.1. The National Trust London and South East Region is grateful for the opportunity to appear at the examination-in-public to discuss proposed allocation HW9 (f). The National Trust will confine its representation to the Inspector's question 1 in the published Schedule of Matters, Issues and Questions.

1.2. We submit policy allocation HW9 (f) is not sound due to its inherent conflicts with legislation, policy, Planning Practice Guidance and Historic England Good Practice Advice Notes. We find that an application coming forward, as envisaged by HW9 (f) would be contrary to settings legislation and policy and AONB legislation and policy. Further it would be contrary to the pre-submission text with regard to DM 31(2), concerning the setting of a designated heritage asset and DM 30, concerning the special protection of the Chilterns AONB. This allocation is not consistent with national policy as is required by the NPPF: 35(d).

1.3. The National Trust (NT) owns and cares for land that borders this proposed allocation. The NT's acquisition of the Hughenden Estate in 1947, comprising the Manor (Grade I Building of Architectural and Historic Interest, first listed 21st June 1955) and Gardens, Pleasure Grounds and wider Parkland (Grade II Historic Park and Garden on the Historic England Register, first registered 30th August 1987) and the wider farmed estate. The estate land here is protected by its historic status (including the Hughenden Manor conservation area), AONB status and is also green belt. The public benefit derived is not solely measured in visitor numbers, but in 2017 around an estimated 250,000 people visited the parkland and 146,000 crossed the pay barrier to visit the Manor. The Hughenden Estate is part of the High Wycombe Area Green Infrastructure network, as is set out on the Proposals Map.

1.4. The NT will advance the case that this allocation is harmful to the setting of designated heritage assets (The Disraeli Monument and the Hughenden Park Historic Park and Garden) and fails to deliver the key policy and legislative objectives that serve to conserve and enhance the special qualities of the Chilterns Area of Outstanding Natural Beauty.

1.5. The landscape character context of Hughenden is set out below. It is worthy of note that the designed parkland at Hughenden appears to have been created south and east of the house in the early 19th Century and that (as recorded in the Historic England Register of Historic Parks and Gardens) 'The Monument (E B Lamb 1862, listed grade II) lies 1.5km south-west of the main site near the top of a hill in a gap between the two Tinker's Woods. It is an elaborate, 17m high Bath stone pillar erected by Mary-Anne Disraeli to the memory of her husband's father Isaac. The Monument is an outlying feature designed to draw the eye from various parts of the garden and park across the valley to the west to the wider landscape to the west and south-west'.



Extract from LUC Settings Study (2015) - Landscape context of Hughenden (yellow denotes Hughenden Chalk River Valley landscape character area in the Bucks Landscape Character Assessment of 2011).

1.6. To build here (with, we note, an indicative 50 housing units) would:

1.6.1. **Harm the historic context and setting of the Disraeli Monument and appreciation of the wider historic parkland landscape and its ‘borrowed’ landscape to the east (covering the wider AONB and including HW9 (f)).** The allocation is contrary to the duty in section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 to seek ‘special regard to the desirability of preserving the building or its setting’. Any subsequent planning application would not be able to satisfy the duty. Development would also fail to deliver the policy objectives in DM 31 (2) of the pre-submission Wycombe Local Plan and the National Planning Policy Framework paragraph 185(c) (*‘the desirability of new development making a positive contribution to local character and distinctiveness’*) and in the event of an application coming forward the harm would be substantial under NPPF 195.

1.6.2. **Harm the special character of the AONB** (which is a dry chalk valley) – itself contrary to the legislation in the Countryside and Rights of Way Act 2000 section 85 (*‘In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty’*), the AONB Management Plan and the NPPF 170 duty. The AONB provides the setting for Hughenden, its landscape quality drew Benjamin Disraeli and its topographic concealment resulted in ‘Hillside’ the WW2 use of the Manor for mapping production.

2.0. The National Trust's case

2.1. We rely on two key heritage issues, comprising – the (Historic) **Context** which refers to 'Any relationship between a place and other places, relevant to the values of that place' (Glossary – Historic England Conservation Principles 2008) and (Historic) **Setting** which refers to 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral' (Glossary NPPF 2018)

2.2. Planning Practice Guidance recommends that that the Local Plan must be consistent with sustainable development objectives and that heritage assets must be conserved in a manner appropriate to their significance. (Planning Practice Guidance - *What is the role of a Local Plan?* Paragraph: 001 Reference ID: 12-001-20170728 Revision date: 28 07 2017). Securing a positive strategy for the historic environment requires identifying specific opportunities for conservation and enhancement but also 'this could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the asset'. (Planning practice guidance - *What is a positive strategy for conservation and enjoyment of the historic environment?* - Paragraph: 004 Reference ID: 18a-004-20140306 Revision date: 06 03 2014).

2.3. Historic England (HE) Good Practice Advice Note 1 (GPAN) The Historic Environment in Local Plans (2015) promotes a positive strategy for the historic environment (paragraph 10). HE advice here on site allocations is that 'Site allocations should be informed by an evidence base and an analysis of potential effects on heritage assets'. (Paragraph 18) and HE Good Practice Advice Note 3 on the Setting of Heritage Assets (2nd edition 2017) is that 'Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below *Designed settings*). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance (paragraph 9).

2.4. Views and setting are dealt with (paragraph 10) and (at paragraph 11) and HE provide examples whereby 'Views which contribute more to understanding the significance of a heritage asset include: 'those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected'. The settings GPAN sets out a 5 point methodology of (1) identify the assets (2) Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated (3) Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it (4) Explore ways to maximise enhancement and avoid or minimise harm (5) Make and document the decision and monitor outcomes.

2.5. Wycombe District Council (WDC) have also produced as a part of the Local Plan's evidence base a Topic Paper 9 on The Historic Environment (October 2017). Paragraph 2.3 deals with 'the protection and enhancement of the historic environment as a key part of this drive to achieve sustainable development' and mentions relevant planning practice guidance on allocations affecting the historic environment – we address these later on). At paragraph 4.3 of the WDC Topic Paper 9 Historic England Good Practice Advice, papers are mentioned but not the HE guidance on settings. The WDC Topic Paper discusses the ultimate decision to include locally crafted heritage protection policies in the new Local Plan (CP 11 Historic Environment and DM 31 Development Affecting the Historic Environment).

2.6. The National Trust notes that proposed policy CP 11 at (2) deals with setting. DM 31 is highly pertinent to Matter 7 / HW 9 because it both attributes 'great weight' to the setting of assets and at 2(b) puts in place a 'sequential approach has been taken to avoid, minimise and mitigate harm'. Allied with this the policy allocation HW9 requires submission of a Landscape and Visual Impact Assessment (LVIA) as part of any future application submission. The LPA rightly accepts that evidence of the impact upon the historic environment / heritage assets is required. However in HW 9 the resulting harm cannot be overcome by mitigation as may or may not be countenanced in a landscape and visual impact assessment or a heritage impact assessment. It can only be overcome by avoidance.

2.7. Set against the hierarchy of legislation, Local Plan, NPPF, Planning Practice Guidance and HE Good Practice Advice Notes, an understanding of the impact upon setting and its impact upon the significance of the Historic Park and Garden and the D'Israeli Monument (Grade II) becomes the critical point of examination. In this case the assessment of settings impacts is a combination of both visual and land-use / landscape implications and the relationship between them (i.e. the historic context).

2.8. The National Trust conducted their own examination of the setting of Hughenden (commissioned from Land Use Consultants May 2015). This is currently published in draft but summary content is included below due to the immediacy of the threat now posed by allocation HW 9.

3.0. National Trust Settings Study

3.1. The significance of the Hughenden Estate is a combination of its close connections with Benjamin **Disraeli** and his love for the estate within its wider Chilterns landscape¹, its work as **'Hillside'** as a WWII secret RAF mapping station, its **historic landscape** with the architect E.B. Lamb being commissioned by the Disraelis to embellish the Manor house (Grade I) and design the stable yard (Grade II) and D'Israeli Monument (Grade II), its **landscape character** with Hughenden a key location within the nationally important Chilterns Area of Outstanding Natural Beauty (AONB) with the estate displaying key landscape features and qualities of the AONB (fields patterns the Hughenden chalk stream, ancient woodland on the valley sides, estate farms, tranquillity and dark skies), its **ecological value** and a **community valued green space**.

3.2. This study identifies views and visual settings (paragraph 4.10 and see figure 4.4 below – which also shows the Historic Park and Garden boundary and NT ownership here). These include views from the east of the estate (looking back to Hughenden) in the view along the valley crest at Green Hill / Brands Hill Avenue and views from the D'Israeli Monument looking across the landscape to Wycombe. The study reports that *the Monument (Grade II Listed) is an outlying feature designed to draw the eye from various parts of the garden and park across the valley to the west to the wider landscape to the west and south-west and offers a long view back to Hughenden, nested within the backdrop of trees.* (page 16 of LUC study).

¹ Disraeli had grown up at nearby Bradenham Manor, some 3 kilometres away and was familiar with the Chilterns. The National Trust own Bradenham Village, a large part of the AONB landscape here and the Manor (now let).

Figure 4.4: Main viewpoints and view directions from and towards Hughenden



Extract LUC Settings Study (2015)

3.3. In fact the relationship between Hughenden and its wider rural hinterland creates a ‘borrowed landscape’² as is enjoyed by current visitors and so motivated Benjamin Disraeli to improve the estate after his marriage to Mary-Anne. The urban edge is surprisingly concealed by dint of topography and the National Trust have acquired some of the land to the east of Valley Road to secure this borrowed element (edged blue on the plan).

3.4. Para 4.14 of the study states that ‘In summary, despite proximity to High Wycombe, the setting of Hughenden is rural comprising a mosaic of land uses, with the contrast of the smooth green valley sides and floor- pasture, pockets of chalk grassland on upper valley slopes with interlocking areas of ancient and semi-natural woodland on valley ridge tops.’

4.0. Our key conclusions are that:

4.1. The Hughenden estate both exhibits a strong Chilterns landscape character (rolling hillsides, ancient field patterns, hanging woodlands and a distinctive topography) and its setting also comprises a borrowed landscape to the east, of a chalk valley of a distinctively rural character and a high quality and sensitive AONB landscape, forming a part of a nationally protected Chiltern Valley landscape. This includes proposed allocation HW 9.

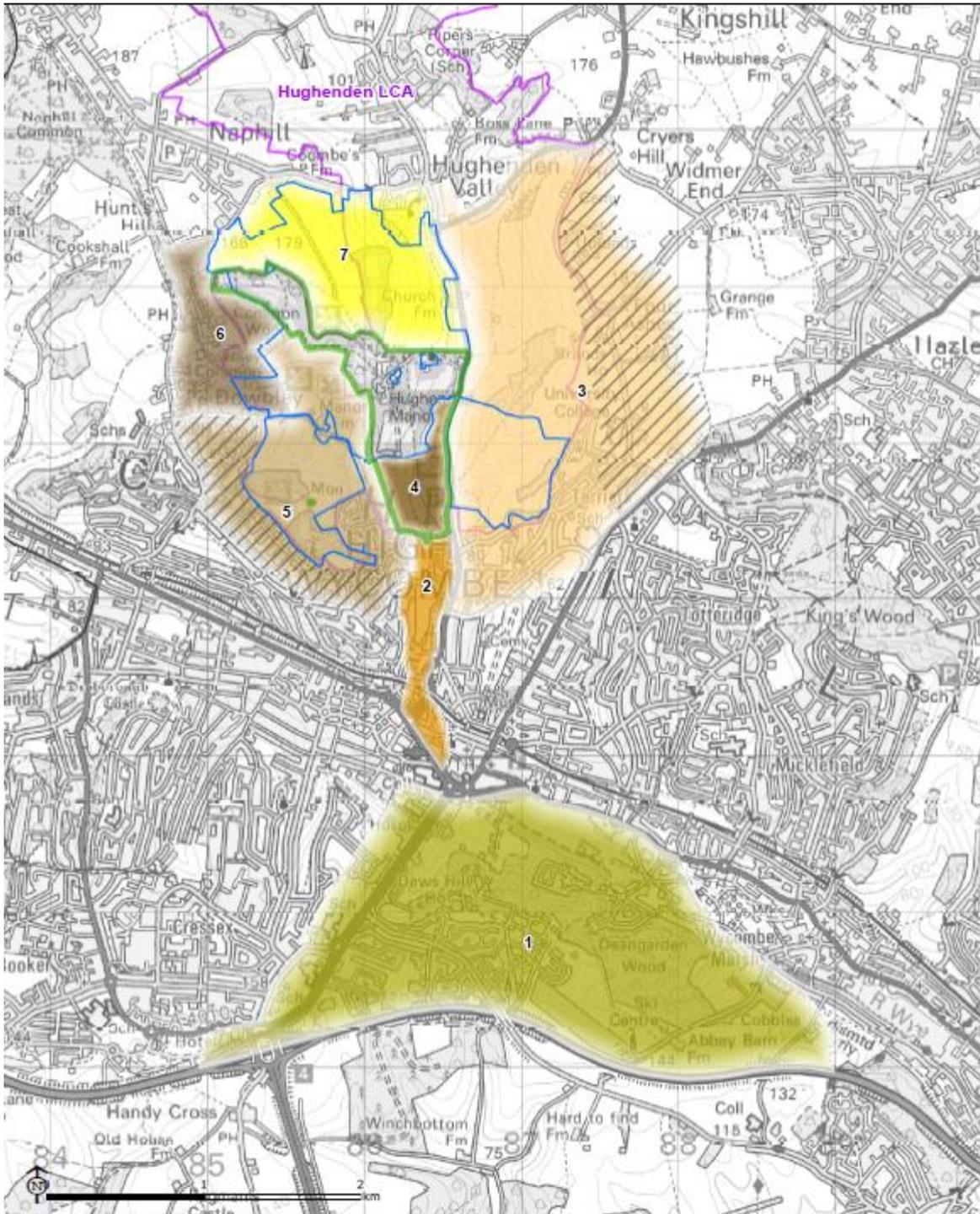
² The borrowed landscape of the chalk valley to the east and south east of the park on the opposite side of the A4128 valley road refers to the wider setting derived from the AONB. It was first referenced in a landscape study commissioned of Bronwyn-Thomas landscape architects in 1995, when reporting on proposals to restore parks of the historic park and garden.

4.2. Particular viewpoints are identified to and from within the Historic Park and Garden, including views from Four Ashes Road (east of HW 9 and looking back to Hughenden) and from the D'Israeli Monument, looking back to Wycombe.

4.3. The wider rural setting and context is also a key component of setting.

4.4. The LUC study (2015) plotted the setting's relationship beyond the property ownership (figure 5.1 - as below) and zone 3 includes this site. The recommendations of the study expressed '*A key concern relates to expansion of High Wycombe and incremental changes/redevelopment and erosion of the character of the Chiltern valley landscape including development along or behind the crest at Four Ashes Road*'

4.5. When understanding the relationship between harm and significance the Planning Practice Guidance is helpful where it states that '*It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting*'. (Planning Practice Guidance - How to assess if there is substantial harm? Paragraph: 017 Reference ID: 18a-017-20140306 Revision date: 06 03 2014)



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| <ul style="list-style-type: none"> 1. High Wycombe: Southern Valley Slopes 2. High Wycombe 3. Hughenden Valley: Eastern Valley Slopes 4. Hughenden Parkland South 5. Manor Farm Valley and D'Israeli Monument 6. Downley Common Wood 7. Hughenden Estate North | <ul style="list-style-type: none"> Hughenden Manor RPG Hughenden Manor Estate National Trust ownership Hughenden LCA Valley crest - key to setting |
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National Trust Settings - Hughenden

Figure 5.1:
 Key elements of the setting that contribute to an understanding of the significance of Hughenden

LUC

Map Scale © A4: 1:35,000

5.0. National Trust Recommendations

5.1. To assist the Inspector in her deliberations, the National Trust seeks deletion of this allocation. At the very core of this issue, to develop here would erode the sides of the Chalk Valley and 'borrowed' landscape that constitutes an important component of Hughenden's significance. That significance is linked to Benjamin and Mary-Anne Disraeli's improvements to the property in the rural setting, which today forms the historic landscape within its AONB context. Standing at the D'Israeli Monument, on publicly accessible land, the view back to Wycombe would be jarred by the new housing, which would appear as a discordant feature of an obvious urban incursion into the rural landscape.

5.2. Looking to the positive strategy for conservation of the historic environment as promoted by WDC in the pre-submission policies CP 11 and DM 31, this proposed allocation would fail to satisfy DM 31 (2) on setting.

5.3 The National Trust is content to share the LUC findings with the LPA as a supplementary part of the evidence base.

5.4. Two fundamental points follow in our judgement of the issues. First, that fundamentally the heritage significance of the Hughenden Historic Park and Garden is harmed – that being a failure to have due regard to the preservation of the setting of the Historic Park and Garden. The magnitude of development results in more than substantial harm. We accept that substantial harm is a high test. Secondly that this development proposal cannot possibly satisfy the duty to conserve and enhance the special qualities of the Chilterns AONB. Such a volume of development constitutes major development within the tests in the NPPF 170 and for which exceptional circumstances do not exist. The Hughenden Estate is a constituent part of the Hughenden Chalk River Valley which is noted in the Bucks Landscape Character Assessment (2011) as '*Hughenden Park is a Registered Historic Park, in the lower section of the valley. The open parkland with scattered trees allows views over the surrounding valley and back towards High Wycombe town, and contributes to the character of this area*'.

5.5. We would invite the Inspector to stand at the D'Israeli Monument and look towards the site. This vista reveals the proximity of Hughenden Manor within its landscape setting and wider AONB landscape including the proposed HW9 allocation.

(2917 words)



Views from D'Israeli Monument 8th August 2018 showing Hughenden within its landscape setting in the AONB (left) and the junction of urban and rural with HW9 (f) centre – right of the image.

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