



Historic Parks and Gardens Supplementary Planning Document

Consultation Statement

**Prepared in accordance with Regulation 12 of the Town
and Country Planning (Local Development) (England)
Regulations 2012**

April 2020

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1. Introduction

- 1.1. Historic Parks and Gardens are important heritage assets that add substantial value to both the landscape and environmental quality within the borough. It is therefore important that such heritage assets are protected and that they are treated in accordance with the character and significance of their grading. The Council's policy for the protection of Historic Parks and Gardens is set out in Development Management Plan 2019 (DMP) Policy NHE9 'Heritage assets'.

- 1.2. The previous List of Historic Parks and Gardens Supplementary Planning Guidance (SPG) adopted in 2001 no longer provides an up-to-date list of Historic Parks and Gardens in the borough. The SPG refers to 1994 Local Plan. As Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (Local Plan Regulations) requires there to be no conflict between an SPD and the adopted development plan, the List of Historic Parks and Gardens SPG needs to be updated to reflect the adoption of the DMP, and in particular DMP Policy NHE9 'Heritage Assets'.

Purpose of the Consultation Statement

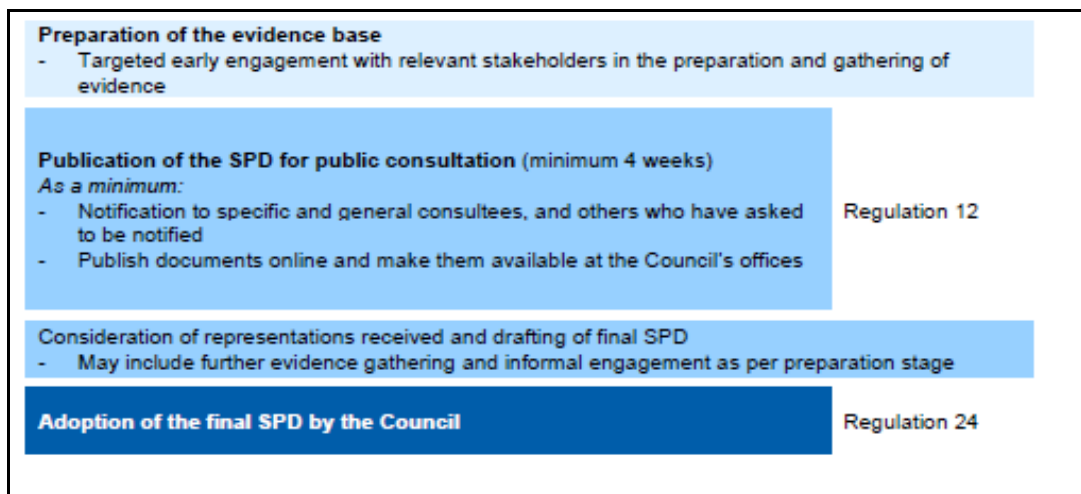
- 1.3. This Consultation Statement has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Development) (England) Regulations 2012 (SI No 767, 2012). All references to "regulation(s)" in this document are to these Regulations unless otherwise stated.

- 1.4. Regulation 12 (a) requires that before we adopt a Supplementary Planning Document (SPD) we must prepare a Consultation Statement setting out:
 - (i) the persons the local planning authority consulted when preparing the supplementary planning document;
 - (ii) a summary of the main issues raised by those persons; and
 - (iii) how those issues have been addressed in the supplementary planning document

2. Preparing the draft SPD

- 2.1. This SPD has been prepared in accordance with the legal requirements of the Town and County Planning (Local Planning) (England) Regulation 2012 (Local Plan Regulations) and the requirements set out in the Council's Statement of Community Involvement in Planning (SCI) (April 2019)¹². The process is summarised in **Figure 1 and 2** below.

Figure 1: Process of preparing an SPD



Source: RBBC (2019) *Statement of Community Involvement*

¹ Available at: http://www.reigate-banstead.gov.uk/download/downloads/id/5437/statement_of_community_involvement_in_planning.pdf

² The SCI summarises how the Council will engage its communities in its planning functions, including in the preparation of SPDs.

Figure 2: Timeline for preparation of the SPD

Stage	Date
Early scoping and information gathering	July - August 2019
Preparation of draft SPD with relevant key individuals and organisations	August – October 2019
Executive approval for public consultation of the draft SPD and supporting documents	5 th December 2019
Consultation on draft SPD with supporting initial Consultation Statement, SEA/HRA/EqIA screening (minimum of 4 weeks)	January 2020
Representations received considered and draft SPD updated as relevant	February 2020
Adoption of SPD (and revocation of the 2001 List of Historic Parks and Gardens SPG) by Council's Executive	April 2020
Publish SPD with final Consultation Statement and Adoption Statement	April 2020

Preparation of the Draft Historic Parks and Gardens SPD

- 2.2. In preparing the draft Historic Parks and Gardens SPD for consultation, we involved and sought the views of the individuals and organisations listed in **Table 1** below. Their suggestions were incorporated into the draft SPD for consultation.

Table 1: Individuals and organisations involved in preparing the draft SPD

Person/ Organisation	Issues/ Comments Raised
<p>RBBC Senior Conservation Officer</p>	<ul style="list-style-type: none"> • Initial meeting on 08 August 19 to discuss the need to update the original List of Historic Parks and Gardens SPD to reflect the changes to the designated boundaries • Reviewed the original SPD and suggested changes that should be made to the maps of historic parks and gardens • Discussed the changes to the boundaries that have taken place since the adoption of the 2001 SPG and identified amendments that should be made. • Noted that in 2003, Historic England has changed boundary to Priory Park (a Grade II Listed Historic Park) that was included in the 2001 List of Historic Parks and Gardens SPG. • Noted that Walton Manor Historic Park and Garden has changed boundaries. The revised boundary was approved by the Executive in 2005. • Noted that Park Down (Walwood House) Historic Park and Garden has been added to the list of historic parks and gardens of special borough interest by the Planning Committee in 2012. • Discussed proposed changes to the boundary of Kingswood Warren and

Natural England

Banstead Place historic parks and gardens.

- Changes suggested to the Appendix: “Useful contacts / Reference Material”
- During the consultation on Strategic Environmental Assessment and Habitats Regulations Assessment Screening Statement, Natural England provided information on additional detail it considers should be included in the SPD with regard to biodiversity.
- On their advice, additional guidance has been included on the importance of biodiversity and landscape enhancement as well as advice on provision of Green Infrastructure.

Consultation on the Draft SPD

- 2.3. Following executive approval on 5th December for public consultation on the draft Barn and Farm Conversions SPD, in accordance with Regulation 12(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 the Council undertook a statutory public consultation on the draft Historic Parks and Gardens SPD between 6th January and 8th February 2020.
- 2.4. During this consultation we wrote to all interested parties³ and we made the documents available on our website and in paper format at the main Town Hall and at the six libraries in the borough.
- 2.5. In accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 we accepted all representations received during the consultation period.

Representations Received

- 2.6. Following the formal consultation stage, the Council has reviewed the responses received and made amendments where necessary. A summary of the representations received and how they have been taken into consideration in finalising the SPD is detailed in Appendix 1.
- 2.7. The main issues raised during the consultation include:
- Updating terminology throughout the document to reflect the NPPF distinction between ‘designated’ and ‘non-designated’ heritage assets.
 - Amending the boundary of Netherne Hospital to remove residential properties
 - Amending description of Gatton Park in Appendix 3 and Appendix 4 to reflect it is largely owned by National Trust.
 - Adding references to Blue Infrastructure and potential impacts of lighting on landscape and biodiversity.

³ Specific and general consultees, prescribed bodies for the Duty to Co-operate and other individuals and organisations registered on the Planning Policy database for such purpose

2.8. Prior to finalising the necessary amendments, the Local Development Framework (LDF) Scrutiny Review Panel reviewed a summary of the responses and the Council's proposed approach/ amendments to the draft SPD. They were happy with the proposed approach.

Adoption of the SPD

2.9. Following adoption, the Historic Parks and Gardens SPD will become a material consideration in determination of planning applications and appeals and will therefore need to be taken into consideration in the preparation of planning proposals for developments within the borough.

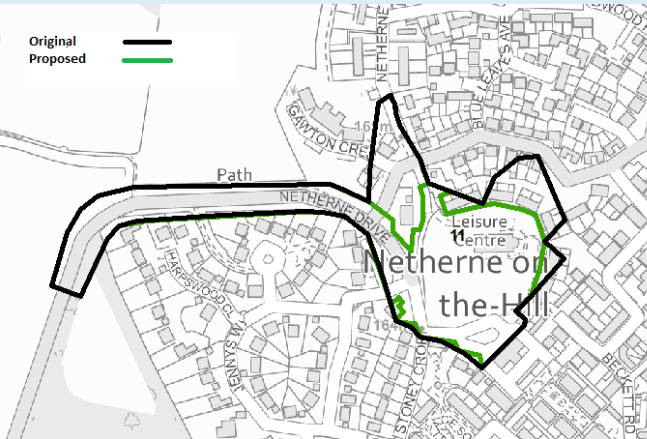
2.10. Upon adoption in accordance with Section 25 of the Planning Act 2008 and Regulation 15 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) the current 2001 List of Historic Parks and Gardens SPG will be revoked. We will bring this to the attention of people living or working in the borough.

Appendix 1: Consultation responses from Specific and General Consultees with resultant changes made to the SPD where relevant

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD where they need to be addressed)	Amendments made to the SPD?
General Consultee RBBC\Representor\0005	Nork Park and Great Burgh should be described as being in Nork, not Burgh Heath.	Disagree. Burgh Heath is the historic name as both Great Burgh and Nork Park were in the manor of Burgh and occurs as an address and exchange name.	N
General Consultee RBBC\Representor\0005	Paragraph 3.9: Reference to Nork Park should be amended to 18 th century garden.	Agreed. Paragraph amended to 17 th and early 18 th century.	Y
General Consultee RBBC\Representor\0005	Is it sensible to encourage the planting of Box (Taxus) in view of the current prevalence of Box caterpillar?	Agreed. Paragraph 3.20 amended to read "their use needs to be encouraged except for Box where, due to the damage from Box Tree Caterpillar, alternatives such as Box Leaf Holly should be considered. Existing historic	Y

		Box can be treated and can be made more resistant to damage than modern Box”.	
General Consultee RBBC\Representor\000 5	Paragraph 3.23: Should this be amended in view of current Ash dieback?	Noted. The Council’s Senior Conservation Officer has advised that whilst Ash dieback is an important consideration, it is a separate issue to the problem of invasive Ash, so it is not considered that it needs mentioning in the SPD.	N
General Consultee RBBC\Representor\000 5	Suggested TPO 5 Tumblewood Road. One of the earliest and largest now living in the UK Metasequoia glyptostroboides (Dawn Redwood).	Noted. TPO suggested to the Council’s Tree Officer.	N
General Consultee RBBC\Representor\000 2	One of the listed historic parks and gardens (Horley Lodge) has been identified for future housing development in the DMP (Regulation 19) Safeguarded land for development beyond the plan period – December 2017, on pages 165 – 169.	Noted. The Historic Park and Garden was assessed as part of a wider land parcel for safeguarding as part of the DMP. It was not identified as a site to be taken forward for safeguarding. The evidence paper noted on pp.167 that development would need to avoid the Historic Park and Garden.	N

Surrey Gardens Trust RBBC\Representor\001 3	Update the wording throughout the document to reflect the NPPF terminology of 'designated' and 'non-designated' heritage assets, perhaps using term 'locally listed' rather than 'locally designated' to avoid confusion.	Agreed. A number of amendments have been made throughout the document to reflect the correct terminology.	Y
Surrey Gardens Trust RBBC\Representor\001 3	Paragraph 3.5: Amend to indicate the lack of selection criteria is only for those sites identified locally.	Agreed. Paragraph amended to reflect the fact there are no detailed criteria set out nationally for assessing locally listed historic parks and gardens and that in surveying gardens for inclusion on the local list, the Council will consider the following characteristics ...	Y
Surrey Gardens Trust RBBC\Representor\001 3	Paragraph 3.15: Add dates for Jekyll and Rohde to give timescale and context.	Agreed. Amended accordingly.	Y
Surrey Gardens Trust RBBC\Representor\001 3	It is noted that no sites are suggested in the SPD for addition to the List of 2001 as amended in 2012. SGT does not have information to hand that would lead us to suggest any additions. We would be happy to comment on suggestions that may arise from the consultation.	Noted. No sites were suggested during the consultation.	N

<p>Surrey Gardens Trust RBBC\Representor\001 3</p>	<p>SGT supports the boundary change of Banstead Place and Kinngswood Warren. The site plan for Netherne Hospital suggests that boundary line passes through buildings and may need review. The description should also be amended to ‘former’ hospital. The description of Banstead Wood should also refer to ‘former’ hospital.</p>	<p>Agreed.</p> <p>Following discussion with the Council’s Senior Conservation Officer, the boundary has been amended to exclude the residential properties (see map below). The description of Netherne Hospital and Banstead Wood has been amended to refer to “former” hospital.</p> 	<p>Y</p>
<p>Surrey Gardens Trust RBBC\Representor\001 3</p>	<p>Appendix 2: Gatton Park Register entry is given in full, however Reigate Priory Park is only showing as summary. They should be treated equally.</p>	<p>Noted.</p> <p>The descriptions provided are as per the official descriptions from Historic England and therefore cannot be amended.</p>	<p>N</p>

<p>Surrey Gardens Trust RBBC\Representor\001 3</p>	<p>Appendix 3: Amend description of Surrey Gardens Trust as per text provided; add information about the reference library at Wisley under the Royal Horticultural Society entry; NCCPG is now Plant Heritage; add an entry for Banstead History Centre, Banstead History Research Group and Historic Environment Record. Amend description for Gatton Park as the major part is owned by the National Trust.</p>	<p>Agreed. Amended accordingly.</p>	<p>Y</p>
<p>Natural England RBBC\Representor\001 7</p>	<p>The SPD should consider making provision for Green Infrastructure within development. This should be in line with any GI strategy covering your area.</p>	<p>Noted. Paragraphs 4.9 and 4.10 of the Historic Parks and Gardens SPD note that Historic Parks and Gardens form an important part of the borough's green infrastructure by contributing to the character of our towns and villages and providing a habitat for important species in the borough. They note that there may be opportunities to enhance the biodiversity of the Historic Parks and Gardens through for example the addition of appropriate planting and habitats</p>	<p>N</p>

		<p>and for more guidance readers should see the Council’s Green Infrastructure Strategy and Action Plan.</p> <p>This level of detail is considered to be sufficient for the function of this SPD, further guidance is provided in DMP Policy NHE4 “Green and Blue Infrastructure” and the Council’s Green Infrastructure Strategy.</p>	
Natural England RBBC\Representor\001 7	The SPD could consider incorporating features which are beneficial to wildlife within development.	<p>Noted.</p> <p>Paragraph 4.10 of the SPD advises that there may be opportunities to enhance the biodiversity of Historic Parks and Gardens through the provision of appropriate planting and habitats such as bird and bat boxes.</p>	N
Natural England RBBC\Representor\001 7	The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example	<p>Noted.</p> <p>The Historic Parks and Gardens SPD recognises that historic parks and gardens are important heritage assets that add substantial value to both the landscape and</p>	N

	through green infrastructure provision and access to and contact with nature.	environmental quality of the borough and seeks to enhance/protect these areas. The Council has a Local Distinctive Design Guide SPG which is used by developers and planners to consider how new development might make a positive contribution to the character and functions of the landscape.	
Natural England RBBC\Representor\001 7	The revised NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (Paragraph 180).	Noted. Reference to impacts of lighting on landscape and biodiversity has been added under Paragraph 4.11.	Y
Environment Agency RBBC\Representor\001 5	The SPD should include enhancement and protection of water related biodiversity and contribute to helping wildlife adapt to climate change and reducing its adverse impacts.	Noted. Paragraph 4.10 of the SPD says that “there may be opportunities to enhance the biodiversity of these areas through the addition of appropriate planting and habitats such as bird and bat boxes”. This has been amended to include reference to enhancement of biodiversity within the	Y

		<p>existing waterbodies of the historic parks and gardens.</p> <p>DMP Policy NHE4 “Green and Blue Infrastructure” provides further guidance on how the council will seek opportunities to increase green and blue infrastructure. This has been referenced within the SPD Paragraph 4.10.</p>	
<p>Environment Agency RBBC\Representor\001 5</p>	<p>Biodiversity net gain is fast rising up the planning agenda. The Biodiversity metric 2.0 was published in beta format by Natural England in July 2019. It will underpin any future mandatory requirements but in the meantime can be used by developers and planning authorities to meet local plan requirements.</p> <p>We have updated our 2008 guidance for encouraging wildlife into urban estuaries and improving the estuary edges for people.</p> <p>We have updated our advice for developers and it is now a joint agency document with advice from</p>	<p>Noted.</p>	<p>N</p>

	<p>Environment Agency, Natural England and Forestry Commission, it's available to view on our website:</p> <p>https://www.gov.uk/government/publications/planning-a-guide-for-developers</p> <p>For the most up to date maps and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. https://environment.data.gov.uk/.</p>		
General Consultee RBBC\Representor\0004	<p>We are in the midst of a climate emergency. The fact that your department continues to prioritise factors other than insulation and microgeneration in setting planning policy is short sighted.</p>	<p>Noted.</p> <p>The Council is undertaking other work in relation to the climate emergency. Ground source heat pumps are used extensively at Gatton Park, Priory Park and Walton Manor. Other sites also have PV Arrays etc.</p>	N
Gatwick Airport Safeguarding	<p>No specific comments.</p>	<p>Noted.</p>	N

RBBC\Representor\0008			
General Consultee (Infrastructure provider) RBBC\Representor\0022	No specific comments.	Noted.	N
Transport for London RBBC\Representor\0001	No specific comments.	Noted.	N
National Grid RBBC\Representor\0009	No specific comments.	Noted.	N
Horley Town Council RBBC\Representor\0010	No specific comments.	Noted.	N
Highways England RBBC\Representor\0011	No specific comments.	Noted.	N
Tandridge District Council	No specific comments.	Noted.	N

RBBC\Representor\001 2			
Historic England RBBC\Representor\001 4	No specific comments.	Noted.	N

Appendix 2: Any other matters

A number of other minor amendments were suggested, including grammatical and typographical suggestions and addition of references within main text to support the Appendices. Where considered appropriate these amendments have been made.

Appendix 3: Individuals and organisations consulted on the draft Historic Parks and Gardens SPD under Regulations 12 and 13

Specific Consultees	
Homes England	Eircom UK Ltd
Sutton and East Surrey Water	Energis Communications Ltd
Scotia Gas Network	EU Networks Fiber UK Limited
National Grid	FibreSpeed Limited
CLH Pipeline System Ltd	Fibrewave Networks
Surrey Downs CCG	FLAG Atlantic UK Limited
Southern Gas Network	Fujitsu Services Limited
British Gas	Full Fibre Limited
Southern Electric	G. Network Communications Limited
Thames Water Utilities Ltd	Gamma Telecom Holdings Ltd
Vodafone	Gigaclear Plc
O2	Glide Business Limited (formerly WarwickNet Limited)
UK Power Network	Hutchison 3G UK Limited
Government Pipeline & Storage System	Hyperoptic Ltd
euNetworks Fiber UK Ltd	In Focus Public Networks Ltd
Gas Transportation Company	InTechnology Smart Cities Limited (formerly InTechnology WiFi Limited)
Three	Integrated Digital Services Limited
Southern Water	Internet Central Ltd

Thames Water	Internet Connections Limited
Crawley CCG	GTT Communications
British Telecom	ITS Technology Group Limited
Thames Water	IX Wireless Limited
Network Rail	KCOM Group Plc
Environment Agency	Lancaster University Network Services Limited
Crawley Borough Council	Lightning Fibre Limited
London Borough of Croydon	Lothian Broadband Networks Limited
Epsom & Ewell Borough Council	Communications Infrastructure Networks Limited
Mole Valley District Council	MLL Telecom Ltd
London Borough of Sutton	MS3 Networks Ltd
Tandridge District Council	My Fibre Limited
Surrey County Council Minerals & Waste Planning	NATS (En Route) PLC
Surrey County Council Planning Consultation	Neos Networks Ltd
Greater London Authority	NextGenAccess Ltd.
Coast 2 Capital	NWP Street Ltd
Historic England	Ontix Limited
Marine Management Organisation	Orange Personal Communication Services Ltd
Natural England	Open Fibre Networks Limited (formerly Independent Next Generation Networks Limited)
Highways England	Open Network Systems Limited
Natural England Sussex & Surrey Team	Quickline Communications Limited
Historic England South East	PCCW Global Networks (UK) Plc

Mayor of London	Ranston Farm Partnership
Local Plans South - NHS Property Services Ltd	Aqua Comms
Sussex and Surrey Police	Severn Trent Retail Services Limited
Transport for London	Solway Communications Limited
The Coal Authority	Sky Telecommunications Services Limited
Nutfield Parish Council	Sky UK Limited
Burstow Parish Council	Sprintlink UK Ltd
Salfords & Sidlow Parish Council	Spyder Facilities Limited
Betchworth Parish Council	SSE Telecommunications Limited
Chaldon Parish Council	Subtopia Limited
Charlwood Parish Council	TalkTalk Communications Limited
Headley Parish Council	Tata Communications (UK) Limited
Newdigate Parish Council	Telewest Limited
Bletchingley Parish Council	Telefonica UK Limited
Horley Town Council	TeliaSonera International Carrier UK Limited
Leigh Parish Council	The Wireless Infrastructure Company Limited
Outwood Parish Council	The Wireless Asset Company Limited
Buckland Parish Council	Telecommunications Wireless and Infrastructure Services Limited
National Grid (Avison Young)	Telensa Ltd.
Airband Community Internet Limited	Telent Technology Services Limited
Airwave Solutions Limited	Thus plc
Affiniti Integrated Solutions Limited	TIBUS (trading as The Internet Business Limited)
Arqiva Communications Ltd	Timico Partner Services Limited

Arqiva Services Limited	Tiscali UK Limited
Arqiva Limited	toob Limited
AT&T Global Network Services (UK) B.V.	Truespeed Communications Ltd.
Atlas Communications NI Limited	UK Broadband Limited
(aq) Limited	Ulstercom Ltd
Atlas Tower Group Limited	Urban Innovation Company (UIC) Limited, (formerly Euro Payphone Ltd)
B4B Networks Ltd	Verizon UK Ltd
Bolt Pro Tem Limited	Virgin Media Limited
Boundless Networks Ltd	Vodafone Limited
Box Broadband Limited	Voneus Limited
Britannia Towers II Ltd	Interoute Communications Limited
British Telecommunications plc	WHP Telecoms Limited
Broadband for the Rural North Limited	Wifinity Limited
Broadway Partners Limited	Wightfibre Limited
Call Flow Solutions Limited	Wildcard UK Limited
Cambridge Fibre Networks Limited	WPD Telecoms Limited (formerly Surf Telecoms Limited)
Central North Sea Fibre Telecommunications Company Limited	Zayo Group UK Limited
CenturyLink Communications UK Limited	Zzoomm PLC
CityLink Telecommunications Limited	A.P.T.
CityFibre Metro Networks Limited	AERIAL SITES PLC
Cogent Communications UK Ltd	Cellular Design Services
COLT Technology Services	Harlequin Group Ltd

Community Fibre Limited	IPM Communications PLC
Concept Solutions People Ltd	Mobile Broadband Network Limited
Cornerstone Telecommunications Infrastructure Limited	Mono Consultants
County Broadband Limited	Waldon Telecom Ltd.
EE Limited	Sitec Infrastructure Services Ltd
General Consultees	
Residents, businesses, registered providers and developers on the Council's Planning Policy Consultation Contacts database	