

Bedfordshire Gardens Trust

Debbie Willcox
Case Officer
Planning Department
Central Bedfordshire Council
Council Offices
Priory House, Monks Walk
Chicksands
Beds SG17 5TQ

8 September 2017

Dear Debbie Willcox

CB/16/01389/FULL

Installation of a single wind turbine with a maximum tip height of 143.5m (hub height 100m; rotor diameter of 87.0m), substation, hardstanding area, access track, underground cabling and associated infrastructure. Land off A5 at Checkley Wood Farm, Watling Street, Hockliffe, Leighton Buzzard LU7 9LG

Bedfordshire Gardens Trust is responding to this application on behalf of the Gardens Trust, statutory consultee for planning applications affecting registered historic parks and gardens. Although this application originated in 2016, it was only received by the Gardens Trust on 24 August 2017, giving a very short time to assimilate the voluminous documentation and respond. I hope that in future such referrals will be more timely. This response is restricted to the impact of the proposal on registered parks and gardens, and does not cover other heritage aspects more generally.

Summary: Bedfordshire Gardens Trust objects to this application owing to the level of harm to the Grade II registered site at Battlesden Park, and the Grade 1 registered site at Woburn Abbey.

Registered parks and gardens within the Study Area

The cultural heritage assessment by Headland Archaeology (as revised September 2016) states that there are two registered parks and gardens within 5km of the proposed turbine – Woburn Abbey and Battlesden Park. For completeness, it should be noted that there is now a third site within that radius: the formal gardens at Stockgrove House, Leighton Buzzard, were registered Grade II on 15 November 2016 (list entry number 1434590). The formal gardens are just across the local authority boundary in Milton Keynes UA, while the parkland adjoining forms the greater part of the Rushmere Country Park in Central Bedfordshire. A fourth site – the Whipsnade Tree Cathedral, registered Grade II on 10 February 2017 (list entry number 1439326) lies south-east of Dunstable within the 15km radius of the Outer Study Area.

Local planning policies

Heath and Reach lies within the area of your Council's South Local Development Framework, consisting of the former South Bedfordshire District local plan adopted in 2004. Policies from that plan saved in 2007 include BE7: Conservation and Enhancement of Historic Parks and Gardens: *"the local planning authority will encourage the conservation, enhancement and restoration of the historic parks and gardens identified as of importance in this plan and on the proposals map. Planning permission will not be granted for development that would unacceptably harm the character or appearance of such areas and their settings, or result in the loss of significance features."*

Battlesden, Potsgrove and Woburn, however, lie within the area covered by the North Local Development Framework adopted in 2009. Within the core strategy of that Framework,

heritage Policy CS15 states unequivocally that the Council will protect, conserve and enhance the district's heritage. I suggest that this should have some weight in the Council's decision-making process on this application. The emerging UA-wide local plan is at a relatively early stage – a public consultation exercise finished on 29 August 2017 – and so must have limited weight.

Battlesden Park

This representation focuses on Battlesden Park, which is the closest site to the proposed wind turbine, and the most seriously affected. I have made a visit to the publicly-accessible parts of the site, which contains the remains of mid-19th century formal terraced gardens in an 18th century (and earlier) park, and is associated with Humphry Repton and Joseph Paxton. As the Historic England register entry describes, the park of around 90ha is still bounded largely by agricultural land, with the south-west boundary formed by the A5 Watling Street. The site of the house lies within the park on the southern tip of a shoulder of land extending 1km south from the A4012, with Battlesden church forming a close group with the house site and the walled garden to the south of the churchyard. The site slopes down to a valley to the west and south in which lie two lakes. This topography (shown in the LIDAR view at Appendix A Fig 1) is very important in assessing the degree of harm which the proposal would cause to an area which remains (apart from the existing intrusion of the Double Arches wind turbine) remarkably rural and unspoilt. Battlesden Avenue running from the northern boundary of the site to the Hockliffe-Woburn road is also registered as part of the site.

The Cultural Heritage Assessment produced by Headland Archaeology for the applicant (reworked September 2016) concludes (page 39) that there will be no harm to the significance of Battlesden Park. We disagree. The Assessment underplays the importance of views within and beyond the site. There is evidence that views from the pre-1860s house and gardens to the south and south-west across Watling Street towards the Chilterns were valued, as attested by a visitor in 1748, and the presence of a bastion-shaped viewing mount (Tent Hill, shown topped with a tent in a watercolour c1820) at the south-west corner of the lower garden terrace.

We do not know the details of the garden before Humphry Repton's visit in 1806, but his sketch of the site made for an 1808 almanac, though schematic, shows house, church, a terraced walled garden with greenhouse, and Watling Street in the foreground. The later terraces south-west of the new house as designed or redesigned by Joseph Paxton and G H Stokes in the 1860s were clearly intended to take advantage of the aspect and the topography.

The northern drive and avenue runs along a ridge from which there are views to east and west. It is acknowledged that the views to the west above Home Wood would be impacted by the proposed turbine, as shown at Viewpoints 5 and 6 of the Battlesden Visualisations prepared for the applicant in December 2016. Other areas of the Park are dismissed in the Cultural Heritage Assessment (page 39) on the basis that "*there are public foot paths through the park, though none of the views are frequently accessed by members of the public and the hedgerows limit any such views.*" I would remind the applicant that a heritage asset is a heritage asset irrespective of public access.

Of the two lakes referred to in the register description, the larger lying south-west of the house site can be attributed on good evidence to a (very young) Joseph Paxton (whose elder brother William Paxton was the estate bailiff) and dated 1822. One of the public footpaths running down the eastern side of the registered site overlooks the lake. The Double Arches turbine is clearly visible from it (Appendix A fig 3) and again the proposed Checkley Wood terminal would greatly add to visual intrusion. The turbine is visible not just from the raised area overlooking the lake, but along the path for some distance where it runs parallel to the drive from the A5 lodges.

The Double Arches turbine is also clearly visible from the public footpath running along the western edge of the registered site (Appendix A fig 4), and from the footpath running westwards from the Avenue across the valley towards Potsgrove Church (which is outside the registered site, but part of its setting). The proposed Checkley Wood turbine would also intrude on those views.

Battlesden Church

The Historic England representation of 11 January 2017 concludes from the Visualisations of December 2016 and other evidence that “although the level of harm [to Battlesden Church] would be considered less than substantial (in the terminology of the NPPF), it would be towards the higher end of that scale”. We agree. As well as being a Grade I listed building in its own right, the church lies within the registered parkland and is an important component of the significance of the site. It follows that there must be harm to the significance of the registered site as well.

Woburn Park

I see no reason to disagree with the reasoning and conclusion by Historic England (their ref P0051167, representation of 11 January 2017) that there would also be a low-moderate level of harm to the significance of the registered Woburn Abbey park.

Conclusions

The proposed Checkley Wood turbine, because of its great height and the flickering movement of the rotor arms, would cause serious visual intrusion to the landscape of the Grade II Battlesden Park, leading to a high, though less than substantial, degree of harm to its significance. There would also be a low to moderate degree of harm to the significance of Woburn Abbey park. Harm to these assets should be exceptional (in the case of the Grade 1 Woburn Abbey park, wholly exceptional), and can only be justified by very compelling arguments. In deciding the application your Council needs to conduct a balancing exercise as in National Planning Policy Framework paragraphs 132 and 134 to establish whether the public benefits of the proposal outweigh the damage to the heritage assets affected. That is a matter for your Council, but I will only point out that the proposals have no public benefits as far as the registered parks and gardens themselves are concerned.

Yours sincerely



CAROLINE BOWDLER
Bedfordshire Gardens Trust
Conservation



Appendix A; Images, Battlesden Park

Fig 1 LIDAR image of Battlesden Park

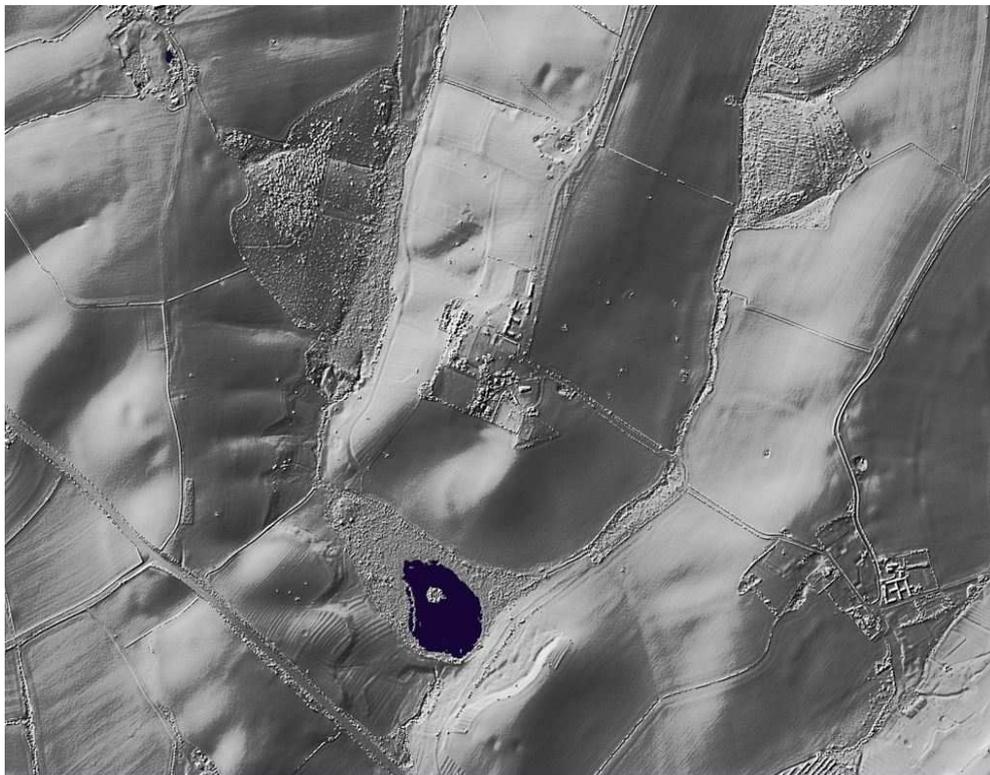


Fig 2 Key to views at Fig 3 and fig 4

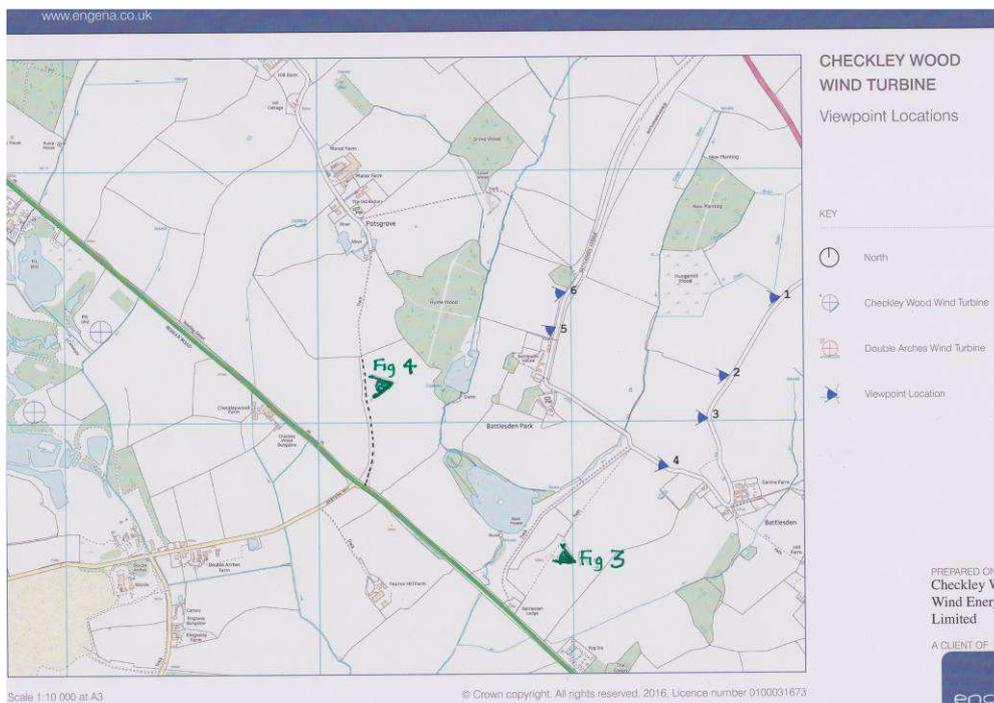


Fig 3 Double Arches wind turbine seen across Paxton's lake



Fig 4: Double Arches turbine seen from W edge of registered site

