F/YR11/0432/F 9 June 2011

Applicant : Mr J Humphrey

Agent : Mr C Walford Peter Humphrey Associates Ltd

Land West of Manor House, Station Road, Wisbech St Mary, Cambridgeshire

Erection of 2no x 2-storey 4 -bed and 2no x 3-storey- 5/7 bed dwellings with detached double garage/stores

This proposal is before the Planning Committee due to it being called in by Councillor Booth in order to assess the impact of the application on the setting of the street scene given the nature of the development

This application is a minor application.

Site Area: 0.49 hectares

1. SITE DESCRIPTION

The site is located to the north of the main settlement of Wisbech St Mary and to the west of Station Road (Class C road). It is a field which is open along the frontage and lies just below road level. It is flat and lacks any particular landscape features.

There is linear residential development along the frontage of Station Road, which is denser to the south of the site, towards the core of the village, and more sporadic in nature to the north. Manor House, which is a Grade II* listed building lies opposite the site on the eastern side of Station Road.

2. HISTORY

Of relevance to this proposal is: F/YR10/0795/O - Erection of 6 dwellings – Withdrawn – 25/11/2010

3. CONSULTATIONS

Parish Council:

Local Highway Authority (CCC):

Recommend refusal as this is outside the village development boundary.

- Suitable measures must be put in place to enforce the 'in and out' arrangement to plots 2, 3 and 4.
- Each access requires a vehicle to vehicle visibility splay of 2.4m x 90m to be provided in both directions and must be kept clear of any obstructions such as planting, walls and railings. The splays must be identified in their entirety and they must be drawn tangential to the channel line of the carriageway

	 where there is a change in horizontal alignment. A 1.8m wide footway will need to be provided along the front of the development commencing at the northern end of plot 1 and finishing at the field access south of plot 4. The plans show a provision of a 1.5m wide footway without any justification being made for a lesser dimension to be used. 2.0m x 2.0m pedestrian visibility splays from each of the new vehicular access's need to be provided onto the new footway. The existing footway on the east side of Station Road will also require extending by approximately 12.0m in order to provide a safe point for pedestrians to cross.
Environment Agency	No objection.
FDC Scientific Officer (Land Contamination)	Attach contaminated land condition
CCC Archaeology	The site lies in an area of high archaeological potential on a low ridgeway, known for Roman settlement and possible medieval
	settlement remains. As a result the site should be subject to a programme of investigation at the developer's expense. This can be covered by a condition.
S106 Officer	site should be subject to a programme of investigation at the developer's expense. This can be covered by a
S106 Officer FDC Conservation Officer	site should be subject to a programme of investigation at the developer's expense. This can be covered by a condition. The provision of the footpath on the eastern side of Station Road should be the subject of an agreement as it lies outside the application site and cannot be secured via a planning

English Heritage	The proposal would result in substantial harm to the setting of the Grade II* Listed Building by compromising the essential quality of the most important element of that setting. I reiterate my strong objection to the granting of planning permission.
	Full comments attached as Appendix B.
Campaign for the Protection of Rural England (CPRE) – Cambridgeshire and Peterborough	In summary; The site currently makes a valuable contribution to the rural character and setting of Wisbech St Mary by enabling the distinctive long vista of Fenland landscape to visually enter and connect with the village's habitable area. In addition this gap plays an important role in reducing the visual impact of ribbon development along Station Road and helps ameliorate the impression of coalescence. In our opinion the delivery of four private dwellings at this location does not constitute a material consideration of sufficient weight to set aside the policies contained in both national policy and the local plan.
Local residents/interested parties:	 2 letters of objection plus a Heritage Impact Assessment have been received from residents living opposite the site. These representations focus on general planning matters and more particular heritage concerns. These can be summarised as follows: <i>General planning matters</i> Planning Authorities are required to determine planning applications in accordance with the Statutory Development Plan unless material considerations indicate otherwise - s38 (6) Planning and Compulsory Purchase Act, 2004. The policies of relevance are H3, E1 and E16 of the Fenland District Wide Local Plan (FDWLP). The National Planning Policy Framework (NPPF) may dictate that consideration must be given to the weight that can be attached to

the FDWLP; however significant concerns to the principle of the proposal remain particularly in relation to the sustainability of the proposal.

- The site is located in a prominent, flat area of landscape which is high grade agricultural land. As a result the proposal would not be satisfactorily assimilated into the landscape.
- It is considered that the proposal will result in а significant, unacceptable linear extension of the existing pattern of development. The applicants say that there is an existing pattern of development and it is therefore acceptable to extend or continue it, however this argument is flawed in relation to linear development. It could result in development along side roads way out into the countryside and coalescence of the village with more sporadic development.
- It is not clear if adequate visibility can be achieved from the submitted plans.
- Particular concern regarding overlooking from the front windows of the 3 storey properties which could severely restrict amenity and habitability of property opposite the site.

Heritage Assessment (summary)

- As a Grade II* Listed Building Manor House is in the top 5% of Listed Buildings nationally and within this context significant weight must be attached to the harm caused to the setting of this building in the determination of this application.
- The submitted development appraisal does not provide a robust context for assessing the impact of the proposal on the significance of the heritage asset. It concentrates on the benefits associated with the proposal such as the landscaped parkland and the new footway, with insufficient consideration of the

actual, physical harm caused by the introduction of four detached dwellings into the spatial setting of the Grade II* listed building.

- The emphasis in law remains on the "preservation" of the setting of a listed building - s66 (1) Listed Buildings and Conservation Areas Act, 1990.
- The basic arrangement of the proposed application is essentially unacceptable in that it;
 - Preserves only a corridor of space to the west of the Manor House,
 - Diminishes the open space which forms the spatial setting of the listed building, and
 - Encroaches on the prominence of the listed building.

Cumulatively these would cause demonstrable harm to the setting of the listed building and diminish its significance resulting in the failure to meet the tests laid down in the NPPF.

4.

POLICY FRAMEWORK

FDWLP Policy			
· - · · - · · · · · · · · · · · · · · ·	E1	-	To resist development likely to detract from Fenland landscape.
	H3	-	To resist housing development outside DABs. To permit housing development inside DABs provided it does not conflict with other policies of the plan.
	E8	-	Proposals for new development should:
			 Allow for protection of site features;
			 Be of a design compatible with their surroundings;
			 Have regard to amenities of adjoining properties;
			 Provide adequate access
East of England Plan			
	ENV7	-	Delivering sustainable development.

Core Strategy (Draft (Consultation,	
2011)	CS1	- Spatial strategy, the Settlement Hierarchy and the Countryside
	CS2 CS10 CS14	 Growth and Housing Rural Areas Development Policy Delivering and Protecting High Quality Environments across the District.
National Planning Policy Framework	(NPPF)	
Achieving sustainable development	Paras 2 and 11	- Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
	Para 14	- Presumption in favour of sustainable development.
Core Principles	Para 17	- Always seek to secure a high quality of design; recognising the intrinsic character and beauty of the countryside; conserve heritage assets in a manner appropriate to their significance.
Conserving and enhancing the historic environment	Paras 128 - 134	 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

5. ASSESSMENT

Nature of Application This application seeks full planning permission for the erection of 4 detached dwellings with detached double garages/stores on land to the west of Manor House, Station Road, Wisbech St Mary.

The application is considered to raise the following key issues;

- Principle and policy implications
- Impact on designated heritage asset
- Layout and design
- Access
- Service Provision.

Principle and Policy Implications

Since the submission of this application the National Planning Policy Framework (NPPF) has been published and the policies within it came into effect on the day of publication (27 March 2012). The applicant and consultees have been given the opportunity to make further representations in light of the new policy regime.

The application has been assessed against applicable policies contained in the Fenland District Wide Local Plan (FDWLP), The Core Strategy (Draft – July 2011) and the NPPF. Annex 1 of the NPPF deals with its implementation and indicates that due weight can be given to relevant policies in existing plans (FDWLP) according to their degree of consistency with the framework and decision takers may also give weight to relevant policies in emerging plans (Core Strategy) according to the stage of preparation; the extent of unresolved objections and the degree of consistency of the relevant policies to the policies in this Framework.

The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development and at its heart is the presumption in favour of sustainable development. It seeks to ensure the delivery of a wide choice of quality homes, whilst requiring good design to ensure development positively contributes to making places better for people.

Similarly CS14, the criteria based policy, of the emerging Core Strategy requires that to be permitted new development must meet all 12 criteria of the policy and these include the following:

- Protects and enhances any on-site and adjacent heritage assets and their settings;
- Makes a positive contribution to the local distinctiveness and character of the area, including materials used, enhances its local setting, responds to and improves the character of the local built environment, reinforces local identity and does not impact on the street scene or the landscape character of the surrounding area;
- Is of scale that is in keeping with the shape and form of the settlement pattern, and will not adversely harm the character and appearance of the surrounding area.

This proposal seeks planning permission for four dwellings on the edge of the main settlement of Wisbech St Mary, which is considered one of the more sustainable villages in the district. The site lies opposite the Manor House which is a Grade II* Listed Building and as such is designated as a heritage asset.

The principle of the presumption in favour of sustainable development which runs through the NPPF is noted, however, this is qualified in relation to decision taking in the following terms;

- Where the development plan is absent, silent or relevant policies are out of date, granting permission unless:
 - Any adverse impacts in doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - Specific policies in this Framework indicate development should be restricted.

Part 12 of the NPPF is specifically concerned with conserving and enhancing the historic environment. It requires Local Planning Authorities (LPAs) when considering the impact of a proposed development on the significance of a designated heritage asset to give great weight to the assets conservation.

The supporting statements submitted as part of the application argue that the proposal is a natural extension of the housing grain along Station Road, which completes the natural area for development. The point is made that the proposal would not open up land for future undesirable developments and is broadly in accordance with Policy CS1 of the draft Core Strategy, which supports limited growth in Wisbech St Mary. This contention cannot be supported because it is clear that the development extends the linear development along Station Road into an area where existing development is of a more sporadic nature and as a result would fail to make a positive contribution to the local distinctiveness and character of the area. In fact it would lead to the coalescence of development, which forms the established settlement with less dense development, which clearly defines the edge of the village and the more open countryside beyond.

If this point, regarding the suitability of the site for sustainable residential development, is felt to be arguable and permission could be granted it is necessary to look further into the guidance contained in the NPPF concerning the presumption in favour of sustainable development. This indicates that sustainable proposals, which accord with the development plan, should be granted unless specific policies in the NPPF indicate that development should be restricted.

There are clearly specific policies of significance, especially in relation to the conservation and enhancement of the historic environment, which have been given little weight in the submissions which accompany the application.

Para 132 of the NPPF is clear that great weight should be given to the conservation of heritage assets and the more important the asset the greater the weight should be given. It goes on to say that significance can be harmed or lost through development in its setting and clear and convincing justification is required for that harm or loss. In addition, substantial harm to or loss of designated heritage assets of the highest significance, i.e. Grade II* Listed Buildings, should be wholly exceptional.

As a result it appears that the proposal cannot satisfy all the criteria of Policy CS14 of the emerging Core Strategy and is at odds with specific policies contained within the NPPF, which relate to conserving and enhancing the historic environment. Consequently the proposal must be considered at odds with local and national policy which demonstrates a high degree of consistency.

The impact on the heritage asset will be explored in the following section.

Impact on designated Heritage Asset

The Planning Statement and Historical Report and Appraisal submissions, which form part of the planning application seek to deal with the impact the proposal will have on the Manor House. As a Grade II* Listed Building it is identified as a designated heritage asset.

The documents use the criteria set out in English Heritage Guidance issued in 2011 on the Settings of Heritage Assets, to evaluate the proposal along side the policies of the NPPF. The focus appears to be slanted towards the benefits of the reinstatement of parkland to enhance the setting of the Manor House along with the public benefits that will arise from the parkland and new footways, as the clear and convincing justification required by the policies of the NPPF to justify the harm.

In the Historical Report and Appraisal it is argued that harm, albeit little, will be caused to the heritage asset as the proposed dwellings will not take precedence over the principal building and will have high brick walls to conceal garages and parked cars, whilst open front gardens, hedgerows, trees and parkland fencing will maintain the parkland appearance and improve the bleak, denuded agricultural landscape of the present day.

The submitted planning statement contends that the appropriate test to apply to the proposal is that set out in Para 134 of the NPPF, which deals with proposals which lead to less than substantial harm to the heritage asset. It than goes on to state that it is considered that the harm caused by the proposal is less than substantial and that the alterations to the setting will be seen as positively beneficial. Where harm is considered to be less than substantial this must be weighed against the public benefit of the proposal. It is unclear if there is any public benefit other than the provision of a footway along part of Station Road to serve the proposal and a path to the playing field. The applicant requires the Parish or District Council to take on the footpath to the playing field and the submitted information states that the parkland is to remain private land.

The view that less than substantial harm will be caused is not shared by English Heritage or FDC's Conservation Officer whose comments have been reproduced in full in the Appendices to this report. Both consultees recommend refusal of the application, failing to see how the proposed landscaping restores the Manor House's historic setting and identifying that the scheme will have a serious and detrimentally negative impact on the setting of the heritage asset. These views are echoed in the representations received from the owner of the Manor House.

It is important to note that the proposed parkland, although on land within the applicant's control, has not been included within the application site. It has been labelled as being grazed with the applicant's own sheep and horses and planted in accordance with a landscaping plan.

Layout and Design

The layout of the proposed dwellings has been designed to provide an open vista for the Manor House over parkland with Lime avenues on either side.

It is acknowledged in the supporting statements that there are several elements of the suggested parkland layout that are not supported by evidence as existing in this location, such as the proposed Ha Ha, and this is a view shared by English Heritage. Whilst those promoting the application do not see this as a flaw and consider the elements to be historically associated with buildings *like* the Manor House, the expert view expressed by English Heritage is that the gap left to provide the vista is merely a token slot left between a line of buildings. The erection of private houses, no matter their exact orientation, is considered to harm the significance of the Manor. The protection of this direct vista to and from the Manor House affords only a limited amount of mitigation and indicates a failure to appreciate the value of the setting of the heritage asset in the wider sense.

It is clear that the exact use or planting of the land opposite the Manor House during the 18th century is not known, however, the views expressed by English Heritage indicate that it is likely to have been in the ownership of the Manor House and would have been ordered to express the owner's authority. A key part of achieving that is the land would not be occupied by the dwellings of other people.

The proposed dwellings are described in the Design and Access Statement as of a traditional design to complement and have minimal detrimental impact on the Manor House with Georgian style sash windows, parapet walls and stone cills. The designs appear to reflect the architecture of the Manor House, but this does not mitigate their impact to an extent where their siting can be seen to enhance the setting of the Manor House or positively contribute to local character.

The NPPF and Policy CS14 of the draft Core Strategy require new development to make a positive contribution to local character and distinctiveness, whilst protecting and enhancing adjacent heritage assets, therefore, considering the submitted information the proposal falls short of these requirements.

Access

Comments from the Highway Authority indicate that there are outstanding matters to be addressed in relation to the provision of adequate visibility splays, provision of the correct width of footway and the operation of the one way drive system.

Service Provision

The submitted plans show no arrangements for bin storage or collection points.

Conclusion

The proposal for four executive dwellings on land opposite the Grade II* Listed Manor House, which is one of the most important heritage assets in the district, is considered to lead to substantial harm to the significance of the setting of the building. This is disputed by the applicant, but is a view firmly held and reinforced by statutory and non statutory consultees.

The NPPF indicates that substantial harm to heritage assets of the highest significance (Grade II* Listed Buildings amongst others) should be wholly

exceptional. The justification for the proposal hinges around the re-creation of a parkland setting, which cannot be robustly evidenced as having existed in the past, and the provision of footpaths. The parkland, which will remain in private ownership, and the provision of paths cannot be seen as weighty public benefits outweighing the substantial harm the proposed housing will cause to the setting of the Manor House.

The most up to date policy advice in the form of the NPPF is that where a proposed development will lead to substantial harm to the significance of a designated heritage asset LPAs should refuse consent, unless it can be demonstrated that the substantial harm is necessary to achieve public benefits that outweigh the harm. Great weight should also be given to conserving the asset and the more important the asset the greater weight should be given. In addition, Policy CS14 of the draft Core Strategy requires new development to protect and enhance any off-site and adjacent heritage assets and their settings and conforms to the principles of the NPPF.

The application is recommended for refusal on the basis that due regard has not be given to the setting and conservation of the Manor House and there is no justification for the substantial harm that will be caused to the heritage asset of highest significance. In addition the proposal extends linear development beyond the main settlement and into an area which should be recognised as an important vista in the Fenland landscape.

6. **RECOMMENDATION**

Refuse

- 1. By virtue of the location of the proposal the development would constitute the erosion of an important gap in the linear development along Station Road. This plays an important role in reducing the visual impact of ribbon development in this location and enables a distinctive, long vista of Fenland landscape to enter and connect with the habitable area of the village. As a result the proposal is contrary to Policy E1 of the Fenland District Wide Local Plan, which seeks to protect the unique, open character of the Fenland landscape.
- 2. The proposed development, which is located directly opposite the Manor House (Grade II* Listed Building and designated heritage asset) will lead to substantial harm and fail to conserve the asset in its appropriate setting. As a result the proposal is contrary to the provisions of the National Planning Policy Framework and Policy CS14 of the Core Strategy (Draft – 2011).

RE: ERECTION OF 4 DWELLINGS AT LAND WEST OF MANOR HOUSE, STATION ROAD, WISBECH ST MARY

This amendment seems even less attractive than the previous proposal, with the removal of the proposed pond and planting scheme and the strange one way drive system through the middle of the site.

Paragraph 132 of the National Planning Policy Framework remarks, "When considering the impact of a proposed development on the significance of a designated heritage assets, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting." In my opinion, the significance of the Manor House (probably the most important building in the village for generations) will be lost or seriously denuded by the introduction of these development proposal.

Para.58 of the "Historic Environment Planning Practice Guide" (which accompanied PPS5 and has not been rescinded), clarifies what is required where a heritage asset is affected by development. This document states that "...an applicant will need to undertake an assessment of significance to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is being affected." Although efforts have been made to create a sympathetic style to reflect the style of the Manor House, this only serves to create a sad, dumbed-down version of the Manor House itself, and does not improve the setting of the Manor House.

Eight points then follow, which highlights how this significance can be measured:

"A successful scheme will be one whose design has taken account of the following characteristics of the surroundings: 1) The significance of nearby assets and the contribution to their setting; 2) The general character and distinctiveness of the local buildings, spaces, public realm and the landscape; 3) Landmarks and other features that are key to a sense of place; 4) The diversity or uniformity of style, construction, materials, detailing, decoration and period of existing buildings and spaces; 5) The topography; 6) Views into and from the site and its surroundings; 7) Green landscaping; 8) The current and historic uses in the area and the urban grain." I do not believe any of those 8 points have been successfully taken into account.

In terms of design, the proposal for 2 styles of 'identikit' houses shows little imagination in design and layout and attempt to mimic the 18thC Georgian house opposite in a style which is a 'pastiche' of the real thing. However, the "executive" 5/7-bedroomed houses are not of a bespoke design, but off-the-peg designs shared with the neighbouring property.

This proposal still lies outside the DAB, and this is not, in my view, "a natural extension of housing" as stated in the design and access statement. Linear development is likely to continue along major routes using the same argument as this, where there is no justification for housing. The setting of the Manor House is still going to be negatively affected by the four houses opposite.

I note that no justification is made or attempted as to the impact this proposal will have on the setting of the Grade II* Listed building opposite this proposal, which I believe is a serious flaw in this application. I think it would be difficult to justify this proposed development on any grounds, but particularly when the setting of Manor House is brought into the equation.

I would therefore recommend refusal of this application on the grounds that this scheme will have a serious and detrimentally negative impact on the setting of the Grade II* Listed building, Manor House.

F/YR11/0432/F: Land West of Manor House, Wisbech St Mary.

Thank you for sending me copies of the Heritage and Planning Statements for the above application, which have been submitted since we issued our formal advice to the Council. A landscaping proposal has also been included and together they aim to mount a justification for the impact of the development on the setting of the listed building. I have reviewed both documents and south the advice of our landscape architect on the planting proposals.

The Heritage Statement repeatedly refers to the applicant's intention to 'restore' the 'parkland' to Manor House that occupied the application site. However, the only evidence for this parkland is the 1888 Ordnance Survey map. This indicates a scatter of trees across the site. Since the trees are large enough to be noted on a map of that scale and are semi-randomly spaced it could be concluded that they were planted in the 18th century at the time the Manor was built in what could be described as a naïve attempt at parkland. The historic owner of the land has not been established (the Tithe Apportionment might have helped, though) but given the scale of the Williamson family holdings it seems reasonable to assume the application site was indeed owned by the Manor's residents and that they planted the trees.

PPS5: *Planning for the Historic Environment* policies HE6 and HE10 asks local authorities and applicants to establish the contribution to the significance of an historic building made by its setting. English Heritage's recently published guidance on setting also sets out the types of contribution one might look for when making such an assessment. The Heritage Statement does not actually say in so many words what that contribution is. However, in the introduction to the Statement a key part of the site's significance is alluded to: "the former parkland landscape would have enhanced the Manor House and provided the setting for a 'gentry' house over-viewing its estate".

Georgian parklands, even of the provincial gentry, were ultimately informed by the prevailing aesthetic theories of the time, but they also reflected the political and philosophical orthodoxy of the upper classes. The way in which land was used and ordered to the utility and appreciation of its owners is important in understanding the significance of the historic setting of houses like the Manor. The notion of a propriatorial relationship with landscape and those that occupy it is at the core of 18th century designed landscapes. When the Heritage Statement refers to the 'over-viewing' of an estate this can be taken in the literal sense of elevated views, but also illuminates the idea of 'over-seeing' the operation of one's property. Expression of ownership is therefore bound up with the more purely aesthetic experience of the Picturesque.

We may not know anything about the exact use or planting of this land during the 18th century, but we do know that it would have been ordered to reflect well upon its owners and express their authority. A key part of achieving that is that the land would not be occupied by the private dwellings of other people. The fact that this essential quality of the land has survived is a major part of its present contribution to the significance of the Manor and allows us to appreciate the building and its times better. The trees may have gone and the use changed from pasture to arable, but the land remains open and green. Equally important, however, is the simple fact that there is *still nothing to indicate that its ownership has changed*. The erection of private houses, no matter their exact orientation and any screen of planting will change that fundamentally and so harm the significance of the Manor.

The practice guide to PPS5 policy HE10 makes it clear that it is not just the visual relationship between historic buildings and their settings, but the historical and spatial one that can contribute to significance. In this case that is an important distinction and reminds us that despite the suggestion of a single focussed view made by the Manor's curving wing-walls the land use and occupancy of the whole wider setting can and does contribute. Making that focus still narrower by screen planting hiding the houses would erode that significance just as surely as would private housing annexing the land from the visual domain of the Manor. If the 1888 map is taken as inspiration for a 'restored' Georgian landscape, an unbroken pasture with informal trees should be created, not a constrained, marshalled space that apologises for the occupying private houses rather than answering to the Manor House.

I fail to see how the proposed landscaping 'restores' the Manor House's historic setting. Some trees would be planted in the area beyond the new houses, but on the roadside a token 'slot' is left between the line of buildings. The houses themselves are accessed from formal drives flanked by stone finials, as if the new buildings are trying to compete with the Manor or pretend they are humble estate worker's cottages reflecting its architecture. Their physical relationship to the Manor as well as their design means this conceit is ineffective in mitigating their impact. The use of a ha-ha is also based on a misunderstanding of how these structures were used and the relationship between house, viewer and pastoral landscape they facilitated. It also fails to mitigate the impact of the proposed development.

The trees in the proposed landscaping scheme appear to have been selected in accordance to their perceived role in the English Landscape Movement. The influences of Lancelot Brown and Humphy Report are cited as part of the reasoning for the proposed landscaping scheme. While the map evidence suggests the 18th century owners may have attempted to display knowledge of contemporary fashion in landscape design, this is not the setting of a grand house or part of a great estate, so such comparisons and design models are not wholly appropriate.

While an occasional exotic tree, such as cedar or pine, may be found in the grounds of gentry houses, it would be highly unusual for such a density and variety of trees as proposed to have been planted in a situation like the application site. The suitability of the preferred trees is also questionable on account of local soil conditions (wet) and exposure. Any proposal to use Horse Chestnut must also be questioned on account of major tree health issues in the southern part of the country.

The new documents do not, unfortunately, contribute much to a discussion of the impact on the Manor House's setting because they do not establish the contribution the setting makes to significance or acknowledge the harm caused to it. The proposed landscaping scheme does nothing to off set the huge damage to the essential nature of the setting, but is rather an ill-conceived attempt to integrate the wholly inappropriate buildings into the setting. I remain firmly of the view that the proposals would result in substantial harm to the setting of the grade II* listed building by compromising the essential quality of the most important element of that setting. I also fail to see how there can be any compelling justification for the proposals in terms of PPS5. There may well be a need for more housing in the District, but if a departure from local plan policy is justified to create a mere four units, then surely an edge of settlement plot can be found somewhere in Fenland that is not in the immediate setting of a highly important listed building? I reiterate my strong objection to the granting of Permission.



