

**South Gloucestershire Council
Environment & Community Services Directorate
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Memorandum to: Catherine Loveday, Development Management
From: Rob Nicholson, Conservation
Date: 31st January 2019.
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Catherine,

In light of the submission of further details, I have updated my initial response with additional comments noted in blue under the "Revised comments 24th March" heading.

In response to the revised illustrative masterplan and DAS as received in early September, as requested, I have added some further comments at end this response in red.

1) Site: Park Farm, Butt Lane, Thornbury

2) Proposal: Erection of up to 630 dwellings; up to 700sqm retail (A1, A2, A3) and Community Hub (D1), network of open spaces.

3) Policy: The application site can be considered to form part of a wider setting of a number of designated heritage assets including the Grade I listed Thornbury Castle and the Thornbury Conservation Area. The proposals should therefore be assessed in accordance with the following policies and guidance which seek to protect the significance of designated heritage assets and their settings: -

- Planning (Listed Buildings and Conservation Areas) Act 1990
- Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended)
- National Planning Policy Framework (July 2018)
- National Planning Practice Guidance – Conserving and Enhancing the Historic Environment;
- Historic England's Good Practice Advice in Planning Note 2 "Managing Significance in Decision-Taking in the Historic Environment".
- Historic England's Good Practice Advice in Planning Note 3 "The Setting of Heritage Assets (2nd Edition)".
- South Gloucestershire Local Plan Core Strategy (Adopted December 2013):
Policy CS1 High Quality Design
Policy CS9 Managing the Environment and Heritage.
- South Gloucestershire Local Plan: Policies, Sites and Plan Development Plan Document (Adopted November 2017):

- PSP17 Heritage Assets and the Historic Environment
- Thornbury Conservation Area SPG

4) Comments on the proposal:

This development potential of this site has previously been assessed as part of the JSP process, as the application site falls within land identified as “location T7”. I have set out below an extract from the supporting assessment work previously undertaken by the Specialist Advice Team. Along with a detailed description of the historic interest of the area, I have highlighted in red probably the most relevant paragraph in the context of this application. .

“Listed Buildings and Conservation Areas:

The following comments are based on a desk-based assessment only in accordance with Step 1 of Historic England’s Site Selection Methodology (The Historic Environment and Site Allocations in Local Plans: Advice Note 3 October 2015). The initial assessment of significance of any heritage assets identified in the comments is based on pre-existing information (previous knowledge of site, Historic Environment Records, National Heritage List for England, photos, StreetView, planning history, aerial photos etc). Site inspections will be required should the cell be shortlisted to inform a fuller understanding of, and to refine the assessment of the level of impact on, the significance of individual heritage assets, including the contribution made by their setting, views (to/from/across), inter-relationships, physical surroundings, topography etc.

The land south of Oldbury Lane forms part of the 16th century New Park, created by Edward Stafford, the third duke of Buckingham under a royal licence to empark 1000acres in July 1510 (which also permitted him to begin fortifying the manor house). The area emparked by the Duke is recorded in the Documentary Research Report produced for the Park Farm development by Dr Christopher Phillpotts (Oct 2010, Cotswold Archaeology). The park was designed to articulate with the new castle and included the scheduled fish ponds to the north and a rabbit warren to the west, described as in the outer garden of the manor house (the area around Conygre Covert). Physical evidence of the deer park may survive in the surrounding landscape in the form of banks, ditches, field boundaries etc. In addition to the deer park, a putative canal is recorded as having been dug by the Duke connecting Thornbury Castle to the shore of the River Severn, allowing him to travel between the castle and his other properties in south Wales. The line of the canal is recorded as passing through this zone and evidence of this structure may survive in-situ although it has not been fully recorded. It is suggested that it may have terminated at Parkmill Farm, where the dam of the mill pond also appeared to align with the inner deer park boundary, a common arrangement on the perimeters of parks.

To the north of the castle and south of this zone is the grade II listed Shieling School, a 19th century neo-classical villa built on land formerly part of the New Park of Thornbury Castle and later an amenity park (Thornbury Park) established in the 17th century. Remnants of the designed landscape associated with the park and the 19th century villa may survive and the area makes an important contribution to the landscape setting of this listed building. There is also a record of a possible duck decoy pond around Watch Oak Lodge.

Parkmill Farm is not designated and the date of construction is unknown. It is thought that it may have been one of the three lodges in the park and is also recorded as the watermill within the park, evidence of which may still survive.

The fields south of Oldbury Lane are, therefore, of intrinsic historic importance and contribute to the history and significance of Thornbury Castle and its development from the 14th century

onwards, particularly the 16th century phase when the Duke of Buckingham embarked on a scheme of expansion and aggrandisement which culminated in his execution. The land forms part of the wider historic landscape setting of the castle, serving as its deer park and 'game larder'. The church tower and upper areas of the castle still form focal points in views from the various footpaths and Oldbury Lane and it is essential that these are protected, along with the openness of the surrounding countryside to the north and west of the castle. A detailed historic landscape appraisal of this area, the features within it and the views into/out/across it has not been carried out and the significance of this area and the contribution it makes to the setting and significance of the castle and the historic town, is not fully understood.

An expansion of the Park Farm development into the immediately adjoining fields running parallel to Oldbury Lane may be seen as a natural continuation of the approved scheme but it would further erode the setting and historic landscape associated with Thornbury Castle, including views to/from/across the designated heritage assets around it. Given the high sensitivity of these designated heritage assets, it is recommended that this area be removed.

The heritage assets north of Oldbury Lane are located in the hamlet of Lower Morton in the NE corner of the zone. As described in the T1 assessment, the hamlet is characterised by a small cluster of detached houses, cottages and farmbuildings around the junction of Duckhole and Morton Street, with scattered farmsteads stretching along the various roads leading into the hamlet.

The grade II listed, mid 17th century Poplar Farmhouse on Pound Farm Lane is nestled amongst trees, hedges, buildings and other screening so as long as a good buffer is maintained, the impact on the setting and significance of this building should be mitigated. The greater impact of development in this part of the zone will be that to the two farmhouses on Morton Street. The grade II listed, 18th century Yew Tree farmhouse (in T1) is located approximately midway along Morton Street facing onto the road towards T7 with its stone built outbuildings forming a small yard to the north. The building is prominent in the streetscape, with rising land to the rear forming a green and rural backdrop to the building and contributing positively to the rural context and setting of the listed building. The outlook from the principal rooms at the front of the building are currently over open fields which, judging by the 1840s tithe map and subsequent OS maps, were intentionally kept clear to enhance the views (all other surrounding fields are orchards except for that immediately opposite the farmhouse). These fields also form an important part of the rural, agricultural setting of Spring Farmhouse (remodelled in the 19th century) which occupies an open plot with numerous modern and historic farm buildings to the north and west. The open field to the south with views out to the Estuary contributes to the sense of space and informal character of the hamlet and is also important in terms of the visual relationship between the two listed farmhouses.

This zone is also likely to form the backdrop to views out of T6 and from the south of T7 which could, potentially include views from the designated heritage assets around Thornbury Castle. This would require a much more detailed views analysis and an assessment of the value that this landscape has in terms of the setting of the Castle. Given the landscape and heritage sensitivity, this area should be removed

The submitted application is supported by two heritage assessments in the form of chapter 7 of ES and a standalone Heritage Appraisal, both produced by BSA Heritage.

The reports contain a detailed description of the application site and its considered historic interest derived from its functional historic relationship with the adjacent heritage assets. I won't therefore repeat the considered evidential, communal, and associative value of the application site as I would largely agree with the findings of the assessment in this regard.

The reports also identify the heritage assets whose setting would be impacted by the proposed scheme with all heritage assets considered within a 1km radius of the site. I would agree with the scope of the assessment in that the proposed development could have the potential to impact on the setting of the Grade I listed Castle and its building group, the Grade I listed St Mary's Church, the Grade II listed Sheiling School and the setting of the Thornbury Conservation Area, which lies to the south of the application site.

Chapter 7 of the ES identifies that the proposed development would cause harm to the setting of the Grade I listed Castle and building group, the Grade I St Mary's Church and the Grade II listed Shieling School. In determining the level of harm, it is suggested that the impact on the Grade I assets will be of "*negligible magnitude*" with a "*neutral effect*". Chapter 7 also concludes that proposed development would also not impact on the conservation area and so the impact would also be neutral.

I would advise that once harm is identified to the setting of any designated heritage asset, the impact cannot be neutral. The impact may be considered limited or negligible, but the impact on significance cannot be considered to be neutral if harm is identified. I would also disagree with the view that although the increased urbanisation of the fringes of Thornbury (that would result as a consequence of the development) would be harmful to the setting of the church, the castle building group and Sheiling School, the proposed scheme would not be harmful to the setting of the Thornbury Conservation Area.

The same findings are largely set out within the more expansive Heritage Appraisal. I would draw your attention to the following paragraphs of the Heritage Appraisal.

Paragraph 4.7 states:

"The change to the setting of the group of listed buildings at Thornbury Castle is likely to have an adverse effect on the appreciation of their significance. They are positioned on higher ground and are consequently visible from a great distance. The open agricultural land of the site and beyond reflects the open land which would have been Thornbury Castle's post-medieval landscape".

Para.4.8 states:

"However, the setting of the Thornbury Castle and church group provides only a limited enhancement of the significance of these structures, with most of this due to the closer parts of its environs which have a parkland character. More widely, there has been considerable change, with enclosure of once open arable fields and modern development. Although a 'castle' in name, Thornbury was in reality a Tudor palace designed to be seen, with defensive virtues a secondary consideration".

Again while I would concur with findings of paragraph 4.7, I would not agree with the assessment of the considered contribution the setting of the Thornbury Castle and church group makes to their significance as set out within paragraph 4.8. While the setting of both designated heritage assets have undoubtedly been harmed by the development at Park Farm, the remaining undeveloped rural and tranquil setting still makes an important and positive contribution to how these assets are experienced. It is also not the case that the Park Farm development should be seen as precedential, as the demonstrable harm that has already been caused by the Park Farm development should not be allowed to be exacerbated by permitting further development that would

result in further encroachment and loss of rural landscape and the erosion of what survives of the parkland setting.

Paragraph 4.10 concludes by stating that in light of the existing screening from the mature planting, *“the development of the site could be achieved with a “less than substantial” to negligible harm to the significance of Thornbury Castle and church”*.

In identifying the magnitude of harm in the context of the Framework, I would agree that the impact of the development on its own and cumulatively would result in “less than substantial” harm to the significance of these designated heritage assets. To qualify this view, in respect to the Thornbury Castle group of the buildings, in views north, the proposed development would be seen likely only in glimpses through the existing planting, but the presence of built form in these current views that comprise of historic parkland would nonetheless be significantly intrusive. Views from the windows within the upper levels of the buildings will also potentially give less filtered views of the proposed development. In regards to the church, I would note in views from Oldbury Lane looking southwards, the prominence of the tower would be further eroded as the views of this historic landmark structure are enclosed, reduced or indeed lost. The rural undeveloped character of the foreground in these views is also an important characteristic of the prominence of the tower.

I would however add that as noted above, along with the increased urbanisation eroding further the setting of the castle and church building groups, the development would be harmful to the wider setting of both the Grade II Sheiling School and the Thornbury Conservation Area. In regards to the conservation area, the intrusive impact of the existing Park Farm development can be clearly experienced in views from the north. The proposed development would result in an expansion of the urban context for the conservation area, with views into the conservation area in effect being lost from the north. The importance of the wider context is also identified within the Thornbury Conservation Area Advice Note. If required I can provide further guidance on this but overall the resulting urbanisation of the rural landscape with its picturesque field patterns would represent a significant change in character.

While a loss of character may be considered an unavoidable consequence of extending development into the open countryside, this does mean harm to designated heritage assets should be accepted. In this case with the rural field patterns providing an attractive and tranquil setting to a number of designated heritage assets, this change in landscape character will change the character of the setting. Although the result may not be substantial, views of the surrounding landscape from these heritage assets will be interrupted by built form. Moreover, the relevant heritage assets which have been located within visually isolated and undeveloped settings since they were built will be experienced in the context of a suburban extension.

I would add it would be helpful to have cross-sections to help demonstrate the potential inter-visibility between the designated heritage assets that the proposed three-storey buildings noted in the DAS. As unfortunately can now be experienced elsewhere on the edges of Thornbury, views can be completely lost or significantly harmed further by the roof scape of a modern development, the impact of which is often made worse by a lack of any coherency in respect to orientation and poor roof materials such as artificial slates that gleam in the sunlight.

5) Conclusion

The scope and methodology of the assessment as set out within the supporting reports is considered to be acceptable. The findings and conclusions are also largely agreed with.

The only areas of disagreement I would have with in the case presented within the Heritage Appraisal is that along with development causing “less than substantial harm” to the setting and in turn significance of the listed castle building group and Grade I listed church, for the reasons noted above the increased urbanisation this locality would also cause harm to the setting and in turn significance of the Grade II listed Shieling School and Thornbury Conservation Area.

While I would agree that the harm to the identified designated heritage assets would vary and the harm may be considered to be limited or at the lower end of the spectrum of “less than substantial harm” in some cases, once harm has been identified, as laid down by recent case law (Barnwell), this creates a strong presumption against the granting of planning permission and this presumption is a statutory one. Paragraph 193 of the Framework can also be considered to reflect this statutory presumption, as it makes clear that 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 the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Consequently, as a result of the harm found to the setting and significance of the listed buildings and conservation area, the proposed development would not comply with paragraph 193 of the Framework which anticipates that great weight be afforded to the conservation of designated heritage assets, including their setting, nor policies CS9 and PSP17 which seek development that protects, and where appropriate, enhances or better reveals the significance of heritage assets and their settings. I would however also note paragraph 196 of the Framework which states “*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, including securing its optimum viable use*”. This “weighing-up” exercise is a matter for the decision maker.

If you could inform me how you intend to proceed with the application I can provide further comments or a reason(s) for refusal if required.

[Revised comments dated 24th March 2020](#)

Having reviewed the revised information submitted in January 2020, I cannot find any information that looks to address or mitigate the concerns expressed above. This is perhaps evident in that no revised heritage statement nor updated chapter 7 in the ES has been prepared. While the scale of development has reduced, it is not the case that development has been pulled back from the designated heritages identified. Also for the sake of brevity I will refer to the Grade I assets as the Castle building group and Church tower and the Grade II asset as the “school”.

I have reviewed the updated DAS and to provide some structure to this response, I will comment on what I consider to be relevant sections and information as they appear within that document.

From the outset the DAS continues to make reference to views of the heritage assets being “filtered and distant”, which may be considered applicable for the Castle building group and school, but does not reflect the issue of the Church tower being a key landmark feature in views from Oldbury Lane. It also fails to address how the views north from the Castle Group and from the school will be managed when there is clearly a cumulative issue to consider.

The final paragraph of part 4.5 “Heritage and Archaeology” states “to minimise visual impact, it would be appropriate this context to consider mitigation planting of screening belts as part of the development design, allowing for retained glimpsed views in places”.

Firstly, I cannot see in any of the more detailed parts of the document any reference to such screen planting. Furthermore, while this may be appropriate as part of limiting the inter-visibility between the castle group and the school, the opposite is required for the church tower, as there should be visual permeability through the site towards the Church to allow for glimpsed views or to put another way, visual corridors would have been expected to ensure views from Oldbury Lane towards the Church tower are not lost.

In the preceding sections of the DAS, I can also find no mention of the views south from Oldbury Lane towards the church tower being of interest, when as noted previously, they are clearly important in that they help contribute to the setting and in turn significance of the church tower as an important landmark building.

If you look at the “Landscape Constraints and Opportunities Plan”, there are no references to these existing views nor the need for any mitigating planting. There is an arrow presumably indicating a view towards the church tower, but this is from the south of the site when consideration of this view should be from Oldbury Lane to the north (i.e. as in View 2 of ES Fig13). I would also suggest Views 12 and 13 is rotated south would also be helpful in how the existing views to the church tower could be managed. I would have thought that at the western extremities of the site, a softer “grain” would also be appropriate to help with the transition between open countryside and edge of settlement. This loosening of the densities could help facilitate some meaningful views though the site towards the historic building group.

In regards to views from within the site, I would also add I can’t see any details on how this view would be meaningfully composed – i.e. what are design principles that would govern a street patterns and plots layout to ensure that this view is delivered, although this is touched on later which I will comment on below.

In considering matters of principle, the revised DAS and therefore the application fails to provide a meaningful case that the potential harm to the setting and significance of the identified designated heritage assets has been reduced or mitigated as much as practically possible. We are therefore moving into a position where any identified harm cannot be considered to have been clearly and convincingly justified, and so the proposed scheme would fail to meet the requirements of both paragraphs 193 and 194 of the NPPF.

Overall, there is a deficiency within the assessment that fails to acknowledge while the impact (as noted above) may be less than substantial in itself, there is a cumulative impact here to also considered which requires a greater regard to the impact of the development that what has been considered to date, with the cumulative impact issue being more relevant in respect of the impact on the Castle building group and school.

Moving onto more detailed matters, the section “Developing the Principles” within the DAS is also noted, and within the list (page 65) that sets out the post-submission updates from December 2019. No responses are noted as having been made to address the concerns noted previously about the impact of the proposed development upon the setting and in turn significance of what are Grade I listed assets and a Grade II listed school. The reference to building heights is noted, but 2-storey houses with a maximum or ridge height of 10.5 metres sounds excessive.

Part 7.2 “Design Rationale” lists a trio of “structuring principles” with “creating places and spaces” being one of the three. Under this heading (page 69) this principle that will be informing the development is clearly one that will be contained within the boundaries of the existing site. It does note therefore seek to adopt what be considered a more comprehensive approach to place-making that looks to the existing features beyond the site and considers how they could be used to inform the proposed development to help ensure the relationship with its surroundings is a positive one. This is relevant as clearly the views from and across the site are considered to be historically sensitive.

As touched on previously, the Concept Masterplan (page 71) fails to show any regard to the key views of the Church tower and the sensitive views north from the Castle building group and school and how they will be managed.

Part 8 – “Design Parameters”, I would again just raise concern about the heights of the buildings, which if you trying to ensure a development is as visually recessive as possible in sensitive views from Grade I listed buildings and building groups, is not going to help matters. I would also reiterate the need for a cross-section through the site to understand the building heights and the collective massing of the development as seen in views from the south.

For part 9 “Illustrating the Principles”, the proposed Illustrative Masterplan is deficient for the same reasons why the Concept Masterplan is considered deficient.

Part 9.5 “Character and Appearance” is interesting as it does refer to the considered provision of glimpse views of the church. However, again these views are only from within the development itself with no recognition of the need to maintain some views from Oldbury Lane. Moreover, from recent experiences where streets have been design to produce visual corridors to allow for the connectivity to a heritage asset as referred to here, the design of these streets will require a bespoke approach in terms of mainly width. I cannot see any reference to this in the following sections and so while it is pleasing to finally see this issue raised, it doesn’t provide in my view any significant meaningful mitigation as the aspiration to deliver what is proposed could be easily lost as orientation is only a part of issue. It is a key point of course, but other parameters needs to be considered to ensure glimpses are not, as in a recent case, rendered down to meaningless views of part of a building rather than looking to terminate a vista with a landmark building. If you look on the street hierarchy, one of the roads identified to help provide a view through the Church tower is only 4.1m (maximum) wide with houses set

behind only very small gardens. The primary streets (part 10.2) are also not exactly expansive boulevards what will allow for the views identified to actually be achieved in any meaningful way. Along with maintaining some key views of the Church tower from outside of the site, a more definitive response that sets out clearly how view corridors are to be created within the site needs to be demonstrated.

For obvious reasons the most sensitive parts of the site are to the south and east, and these are to fall within the “Green Frontage” character area. The design parameters are noted, but the issue of the need for visual coherency raised previously has not been taken on board. The images shown on pages 112 and 113 make this point particularly well, as we have changes in materials and colour for no apparent reason. As can now be experienced when a number of the nearby developments to this sites visited, rather than interesting variety, the almost constant changes in materials (elevations and roof) and orientation provide rather disparate looking developments. The meaningless gaps between the detached properties give a massing of a terrace but without the benefits of uniformity and it all looks rather contrived. A more consistent approach to materials, design and orientation would help reduce the prominent of the buildings and I would suggest that this needs to be included as a key design parameter for the “Green Frontage” character area.

Therefore, the DAS in my view should be amended to set out a need for the Green Frontages to be more consistent in materials and layout/ orientation and the need to meaningful gaps between to help break down the massing of the frontages, especially to the southern edges. The reference to “mainly” 2 storey buildings also need to be changed to a less ambiguous “only 2-storey buildings in this location” as part of establishing a clear design and scale parameter to take forward to RM stage.

To conclude, in light of the above it probably won’t surprise you to read that the concerns raised initially remain and have not been addressed by the revised proposals.

Depending how you intend to proceed, I would advise that as noted above under “conclusion” heading previously, in light of the harm identified to the setting to the Grade I assets and Grade II asset, it is considered that the proposals will be harmful to the significance of these designated heritage assets.

I would though add as set out above there are some steps that can be taken to reduce the harm further and would be happy to discuss these going forward, but for now I cannot support this scheme and noting the comments of Historic England, this application is not a form that could be supported as it can be considered contrary to paragraphs 193, 194 and 200 of the Framework.

Moreover, in accordance with the relevant PPG, I would consider that the proposals would result in less than substantial harm towards the lower end of the spectrum to the significance of the all the asset identified above.

The application is therefore to be considered within the context of paragraph 196, which is matter for the decision maker. I would however advise that as harm has been identified and so compliance with paragraph 193 of the Framework has not been achieved, as established through case law the finding of harm gives rise to the statutory presumption against the granting of permission.

Subsequently, unless in the “weighing-up” exercise as required by paragraph 196 of

the Framework robust material considerations are identified that are considered sufficient to outweigh the identified magnitude of harm, refusal is therefore recommended.

Revised Landscape/DAS response September 2020.

The amended illustrative landscape masterplan now includes proposals to thicken the existing tree belt which would lie to the south of the new development edge. Having raised the need for this increase in planting to increase the levels of screening, this is considered a positive improvement although it will of course take some time to establish and will clearly need to be subject to a management plan to ensure the eventual benefits that the additional planting will deliver are secured. I have assumed the actual details regarding species and planting densities will be left for the landscape RM stage.

The amended DAS has also been reviewed and again the changes to the landscape principles to pick up the amendments to the southern areas are welcomed. The treatment of the priority vistas is more of an urban design issue, as while it will enable views of the tower from within the development and so promote character/ local distinctiveness, it would not overcome or mitigate for the loss of views of St Mary's Church Tower from Oldbury Lane.

The amended design principles for the "Green Frontage" character areas are also noted and welcomed. Therefore, I can advise that the revised DAS and masterplan can be considered address to address my previous concerns about the lack of planting to the south and the lack of design principles for the southern edges of the development.

However, I would still maintain that although somewhat reduced further in light of the recent amendments, the harm previously identified remains. As almost by the inherent nature of the scheme, the development proposals will result in change in landscape character that as identified above in the initial and subsequent responses, would further erode the character of the historic deer park which makes such a positive and material contribution to the setting of the Thornbury Castle building group. The harm to the other assets as previously identified would also remain but again, in light of the recent amendments further reduced to a degree.

Therefore, by reason of siting and scale, the development proposals would still result in degree of harm to the significance of the identified assets due to the impact it will have on their respective settings. As before the magnitude of harm that can be considered "less than substantial" and on the conceptual spectrum of this category of harm, in light of the amendments made I would suggest it has moved slightly further towards the lower end, but as set out the conclusion for the March 2020 response, harm would still be caused to a number of high status designated heritage assets. Accordingly paragraph 193 of the NPPF should be kept in mind when you approach the weighing up exercise are required by paragraph 196.

To conclude, the amendments that have been made to the scheme have undoubtedly improved its overall quality and reduced the potential impact on its surroundings. The concerns that remain are essentially the unavoidable consequences of the dramatic changes in landscape character that comes with green field development and the fact is that in this case, those very green fields can be considered to contribute to the

setting and in turn significance of a number of designated heritage assets. It therefore gets to a point that you can agree a high quality design for the buildings and the landscape scheme, but you are still urbanising a part of the rural landscape that has provided a setting for a number of historic buildings since they were first constructed. Consequently, it is almost an “in principle” issue here, not just one of detail and so while I would agree that where the harm could have been mitigated it has largely been, the impact of the proposals in relation to the principal objections about loss of parkland setting etc. (as outlined above) would still remain.

Consequently with the recent amendments in mind that can be considered to have reduced the considered harm further to a degree, in respect of any final recommendation to the case officer, I would be simply to refer them back to final three paragraphs of the [March 2020 comments](#) above.

Rob Nicholson
Conservation Officer