

Historic landscape advice relating to a proposed new Design Technology & Engineering (DTE) building for Stowe School (application reference 20/03822/APP)

23th August 2021



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1. Introduction

Instructions

- 1.1 Buckinghamshire Council commissioned Matthew Tickner to provide expert historic landscape advice relating to a proposed new Design Technology & Engineering (DTE) building for Stowe School (application reference 20/03822/APP) in June 2021.
- 1.2 The Council has requested an assessment of the application and supporting documents where they concern historic landscape matters, along with a review of consultee comments and the responses by the applicant's advisors to those comments.
- 1.3 This report concludes with an objective opinion on the application and its implications for the Grade I Registered Park and Garden of Special Historic Interest in England and the associated listed buildings.

Experience and qualifications

- 1.4 Matthew is a Chartered Landscape Architect and member of the Landscape Institute with 20 years' of experience in the conservation and management of historic landscapes at some of the United Kingdom's most notable sites including Buckingham Palace, Kensington Palace, Windsor Castle, Trentham, Wilton, Burghley, Lyme Park, Stowe, Styal, Shugborough and Lyveden.
- 1.5 His experience ranges from research and conservation management planning through to master planning, securing funding, detailed design and on site supervision. He has extensive experience in landscape planning, having prepared open space and green infrastructure strategies, woodland and forestry plans and landscape character assessments.
- 1.6 Matthew has delivered seminars and talks to ICOMOS, the Garden History Society, The London Gardens Network and the Association of Gardens Trusts. He is a Chartered Member of the Landscape Institute, a member of the Gardens Trust and an associate member of the National Trust Historic Environment Advisory Group.
- 1.7 Matthew has extensive experience of delivering complex multi-disciplinary projects and has led Cookson & Tickner's competition winning bid to develop HS2 mitigation proposals for Hardwick Hall and since then at Shugborough, Nostell and Dunham Massey. Matthew has recently worked on the Lyveden Reconnected project and a masterplanning exercise at Trelissick, both for the National Trust.
- 1.8 Matthew is familiar with the designed landscape at Stowe having prepared restoration planting proposals for the Deer Park and co-authored the Parkland Plan whilst working at LUC. More recently he assisted the National Trust with a spatial planning exercise in 2018.

Structure of this review:

- 1.9 The remainder of this review is set out under the following headings:
 2. The proposed development
 3. Significance
 4. Policy context
 5. Summary of responses provided by consultees
 6. Review of the application in respect of the historic designed landscape
 7. Conclusions

Location of features referred to in this report

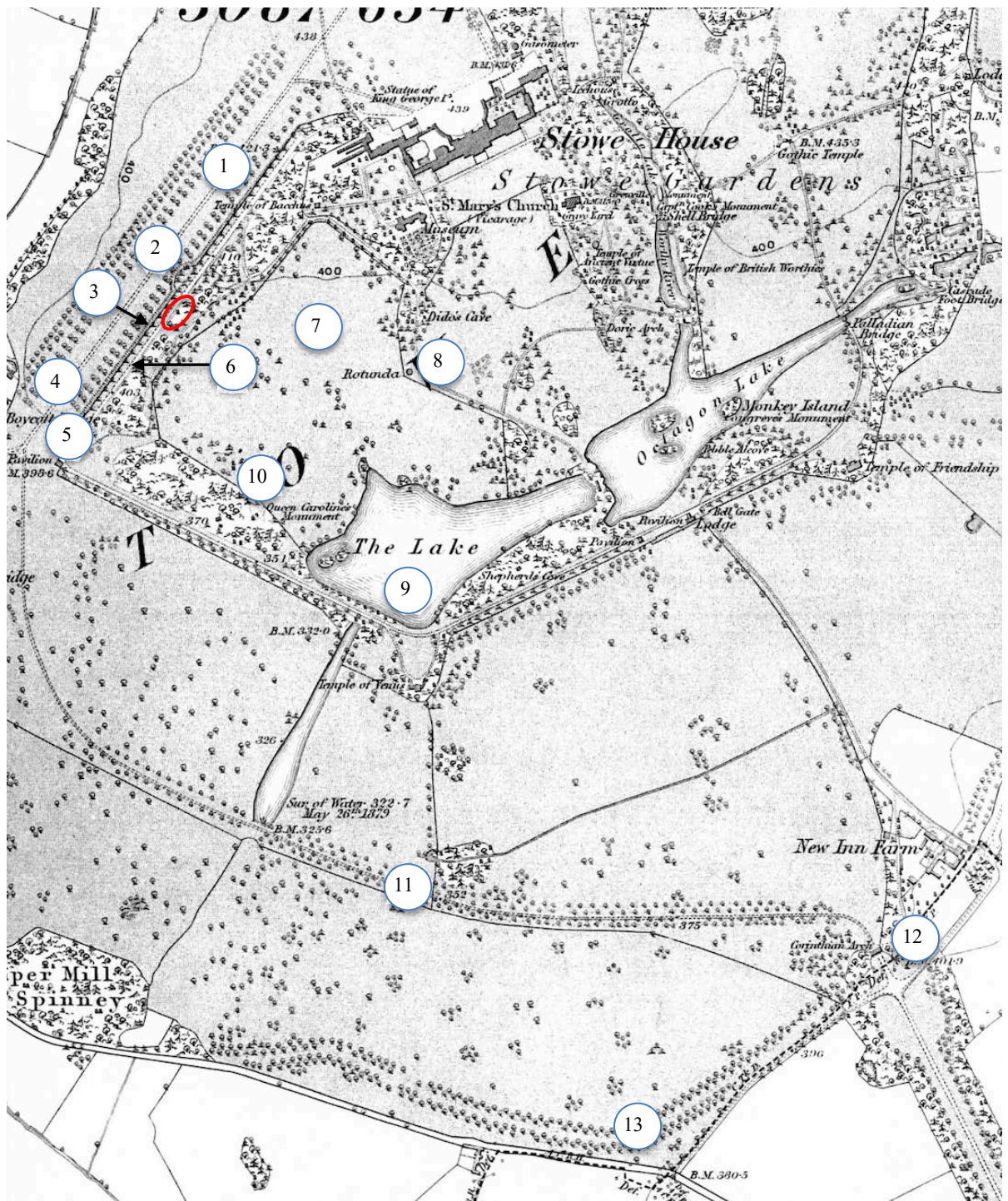


Figure 1.1: extract of the First Edition Ordnance Survey Map surveyed 1880, published 1885 showing features referred to in the text: (1) The Course (2) Lee's Bastion (3) the ha-ha (4) The Oxford Approach - extending south west of the map extract (5) Boycott Pavilion (6) Nelson's Walk (7) Home Park (8) Rotunda (9) The Lake (10) Queen Caroline's Monument (11) Queen's Drive (12) Corinthian Arch (13) Perimeter Walk. The red oval shows the approximate location of the proposed DTE building site.

2. The proposed development

- 2.1 This section provides a summary description of the proposed development and its surrounding context, making specific reference to the historic landscape.

Description of the development

- 2.2 The Design and Access statement outlines the scope of the proposed development which includes:
- Construction of a new two storey Design Technology & Engineering building to replace existing DT facility.
 - New external enclosure, integrated with the new building, to accommodate potential new air source heat pump to provide low energy heating & hot water.
 - Removal of existing diagonal path between Nelson's Walk and the existing access-way to the south east of the new building – to accommodate new facility.
 - Local re-modelling of the route of the existing access-way at the southern corner of the development in order to improve access.
 - New hard and soft landscaping to include hard landscape entrance-way to the new building and services access to north-east elevation adjacent to the Music School.



Figure 2.1: The proposed DTE building shown within the red line boundary (extract from Design Engine drawing 1617-P100 P01).

Size of development

- 2.3 Plan dimensions are not provided on the submitted drawings, therefore approximate dimensions have been scaled from the drawings to ascertain the footprint of the proposed building. The main rectangular portion of the proposed building appears to be approximately 42m x and 13.2m in plan. The dimensions of the building at its largest extents including the heat pump enclosure and external stairway are approximately 47m x 18m including the single storey section of the building with external terrace/gallery.
- 2.4 Spot heights are noted on the elevation drawings enabling calculation of the building height which is 8.38m.

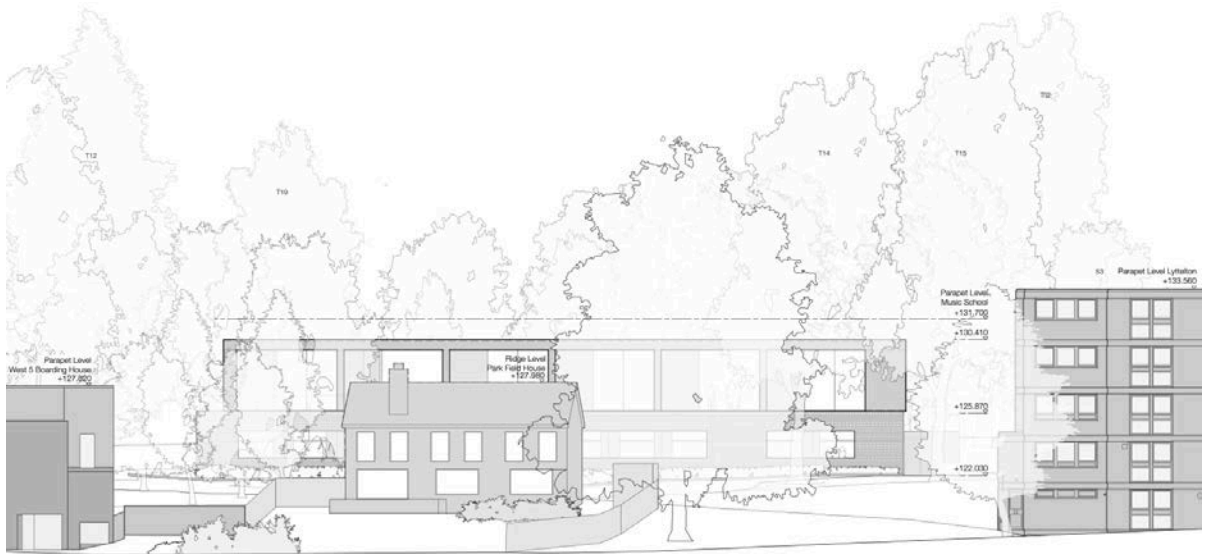


Figure 2.2: South east elevation of the proposed DTE building in the centre of the image behind Park Field House. West 5 Boarding house lies to the left and Lyttelton to the right (extract from Design Engine drawing 1617-P360 P01).

Materials

- 2.5 A horizontal split between materials used in the elevation is proposed with the upper level being a 'bronze coloured material' and the lower being brick.

The proposed development site

The role of the development site in the historic designed landscape

- 2.6 According to the Stowe Conservation Plans: The Western Part of Stowe Gardens and the Course (Rutherford, December, 2012) the proposed development site lies in the Stowe Garden Western Area, within sub-character area 4B Pyramid Wood. The role of this area within the historic designed landscape was to provide a wooded spine and backdrop between the Home Park and Nelson's Walk. This band of woodland would have acted as a planted backdrop and skyline in views from the Home Park and from the Oxford Approach including the Course, whilst also serving to emphasise views out to the parkland from Nelson's Walk.
- 2.7 The Stowe Conservation Plans: The Western Part of Stowe Gardens and the Course (Rutherford, December, 2012) suggests that Pyramid Wood divides the landscape of the Home Park and western part of Stowe Gardens from the quite separate iconography of Nelson's Walk, Nelson's Seat, King George I, and the Roman (Boycott) Pavilion. The Plan notes that '*its main path followed the woodland edge, giving views through open grown trees down over the Home Farm, and leading to the site of Vanbrugh's Pyramid at its south western extremity.*'

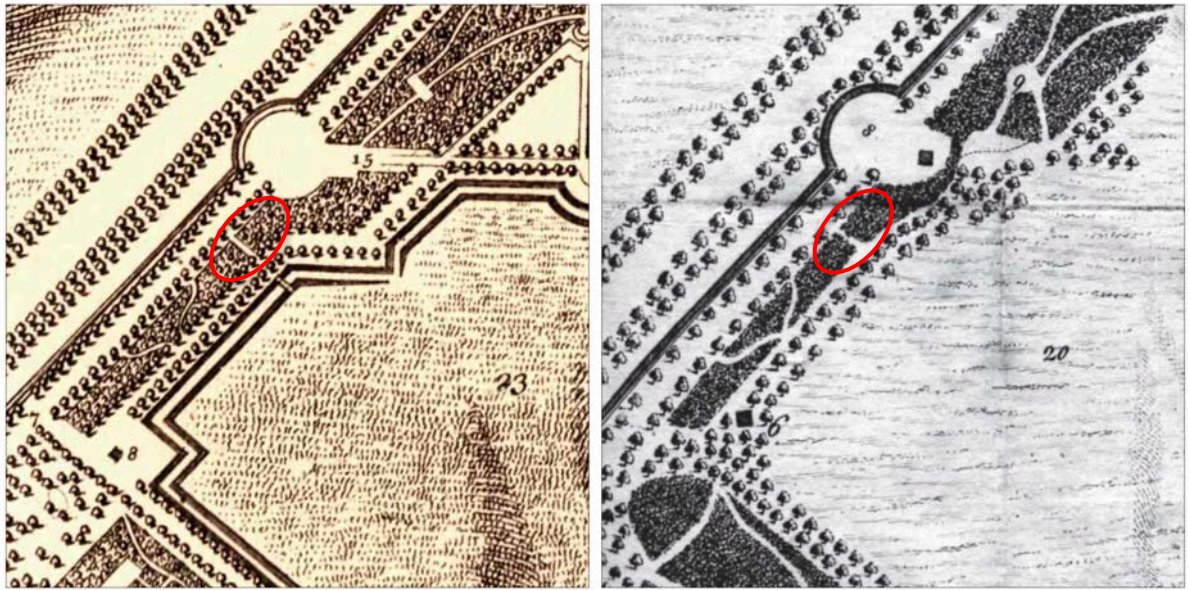


Figure 2.3: Extracts of the 1739 Bridgeman plan & 1783 Seeley guide plans from the Stowe Framework Conservation Management Plan: The School Estate (Rutherford, December 2012) – application site in red.

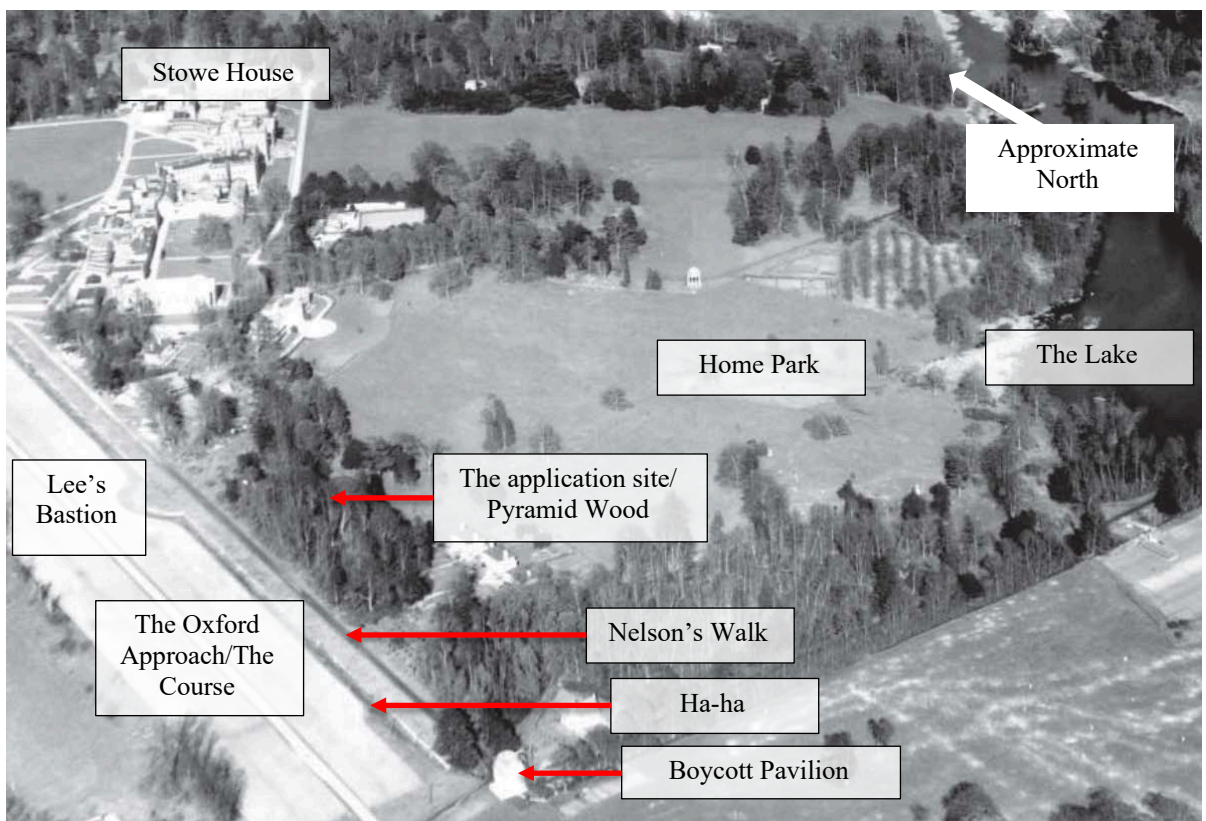


Figure 2.4: Figure 8 from the Stowe Conservation Plans: the Western part of Stowe Gardens and the Course (Rutherford, 2012) showing Stowe Gardens from the west in 1953, with annotations to explain the location of key historic features referred to in the text. Aerial photograph © Cambridge University

- 2.8 The 1739 and 1783 plans (see Figure 2.3) demonstrate this role in the landscape design and appear to show a clear line in the woodland, suggesting that there was a glimpsed view between Nelson's Walk and Home Park at the proposed development site. A 1953 aerial photograph (see Figure 2.4) further emphasises this role, particularly given the absence of avenue trees along the Oxford Approach and the Course at that time.

Current character, condition and survival

- 2.9 The 2012 Conservation Plan suggests that Pyramid Wood is largely intact *‘although it was largely replanted with native trees in the mid-20th century, and the main path below the slope remains as vehicle access. The five masters’ houses and the Lyttelton boarding house along its Home Park edge are intrusive from the interior path/drive but have been largely screened from Home Park.’*
- 2.10 The Plan notes that Pyramid Wood continues to form an important dark backdrop in views north and north-west from the Eleven Acre Lake, Temple of Venus and Rotondo.
- 2.11 Since the Conservation Plan was written in 2012 the West 5 Boarding House (south east of and close to the application site) and the Music School (to the north east of and directly adjacent to the application site) have been added to this part of the designed landscape.
- 2.12 A site walkover of the proposed development site was conducted on 29th June 2021 to inform this review of the application. The woodland contained within the proposed development site continues to perform its historic design intention as described above and a number of historic trees were noted during the walkover. These would appear to pre-date the mid-20th century date of planting suggested in the Conservation Plan and include limes (T11 & T12) planted c.1875, a sycamore (T9) of c.1900, three limes of c.1910 (T13, T14 & T15) and an oak (T2) of c.1911.¹ It is likely that the older trees relate to the third Duke of Buckingham’s (d. 1889) replanting and restoration efforts, whilst the slightly later specimens might date to the Duke’s daughter, Lady Kinloss’ tenure, before Stowe was sold to Harry Shaw in 1921 and subsequently to the School in 1923. The woodland also contains a sparse understorey of yew, cherry laurel and holly.
- 2.13 Figure 2.5 – 2.8 provides photographic views of the application site with historic trees marked.



Figure 2.5: view from the south east towards the application site.



Figure 2.6: View from the south west towards the application site with Park Field House to the right of the photograph and Lyttelton in the background

¹ The DBH measurements included in the submitted tree survey have been used to inform an estimate of significant trees noted during the site walkover. The method for estimating the tree ages follows that set out by John White (November 1998) for the Forestry Commission in *Estimating the age of large and veteran trees in Britain*.



Figure 2.7: view from the north towards the application site with the Music School to the left, Lee's Bastion to the centre and right, with the pathway being Nelson's Walk.



Figure 2.8: View from Nelson's Walk from the south west with the application site to the right of the photograph. The pathway to the right in the middle distance cuts through the application site and the Music School can be seen in the distance on the right hand side.

- 2.14 Much of the woodland is more recent in age, being thought to date to 1960s replanting, with some of those trees in a poor condition and with a fair proportion of ash trees. A hard surfaced path cuts through the area.

3. Significance

Designations

- 3.1 The proposed development lies within a Grade I Registered Park and Garden of Special Historic Interest in England meaning that the designed landscape is ‘of exceptional interest’ according to Rural Landscapes: Register of Parks and Gardens Selection Guide (Historic England, 2018).
- 3.2 The Heritage Impact Assessment (DE Landscape & Heritage, November 2020) identifies 47 listed buildings within the c. 500 hectare Registered Park and Garden, of which 28 are grade I listed ‘of exceptional interest’, four grade II* listed ‘of more than special interest’ and 15 grade II listed ‘of special interest’.
- 3.3 The NPPF considers grade I and II* listed buildings and grade I and II* registered parks and gardens as heritage assets of the highest significance (para. 194).
- 3.4 The whole of the Registered Park and Garden is designated as a Conservation Area.
- 3.5 Stowe is one of Aylesbury Vale’s six Areas of Attractive Landscape.

Defining the significance of Stowe

- 3.6 Given that Stowe was ‘*supremely influential on the English landscape garden during the 18th century*’² all relevant studies and plans concur that Stowe is of international significance as set out below.

The Stowe Framework Conservation Management Plan

- 3.7 The Stowe Framework Conservation Management Plan: The School Estate (Rutherford, December 2012) notes that ‘*Stowe is a special place of international significance, worthy of the greatest care in its conservation and on-going development...*’ (foreword by the Chairman of Stowe House Preservation Trust, Chairman of the Stowe School Governors, and the Regional Chairman of the National Trust).
- 3.8 The Plan also suggests that the Stowe Garden Western Area, where the proposed DTE building is located, is of grade A significance (national or international significance) and states ‘*Lord Cobham’s internationally important and seminal Stowe Garden Western Area landscape of the c.1710s – 20s, the first of his major garden schemes, which was developed in similar grandeur over the following century by his successors.*’
- 3.9 Sub-character area 4B Pyramid Wood is also classified as grade A significance (national or international significance) and the key elements of landscape significance are defined as:
 - *The sylvan backdrop to the Home Park and the screen from Nelson’s Walk.*
 - *Part of the sylvan backdrop, above the ha-ha, to the approach from the Oxford Gates and Bridge, The Course and main drive to the mansion.*
 - *Formerly a key section of the circuit walk around the Home Park c.1725.*
 - *Nelson’s Walk formed a green walk from which to observe the park and The Course beyond the ha-ha.*

Stowe Parkland Plan

- 3.10 The Stowe Parkland Plan (LUC, 2012) notes that ‘*Stowe Park is of outstanding international significance as an exemplary historic designed landscape....*’

² <https://historicengland.org.uk/listing/the-list/list-entry/1000198>

- 3.11 The Parkland Plan emphasises the important relationship between the park and garden: *‘The intervisibility between house, garden, park and the wider landscape is of great importance to the composition at Stowe, and neither the park nor the garden can ever be fully considered in isolation. The significance of Stowe Park thus relates both to its role in the setting to the gardens as well as to it being a designed landscape in its own right. This intervisibility is reinforced by a series of buildings and structures – these are often of individual outstanding architectural merit, although it is the combined effects of architecture and landscape that underpin their importance within the Park.’*
- 3.12 The Parkland Plan identifies the Oxford Approach (noted as being of international importance) and the Course (noted as being of international importance) as two of the key significances of Stowe Park:
- ‘The Oxford Approach follows the line of the Roman road to Oxford, including the grade I listed Oxford Gate Lodges and Bridge over the sinuous Oxford Water, added by Earl Temple and culminating in the grade I listed Boycott Pavilions, en route to the house via the Course. During Earl Temple’s tenure the Oxford and Buckingham Approaches would have been experienced as one (the former following on from the latter), forming what must have surely been one of the grandest approaches to a house of its era.’*
- ‘The origins of the Course date to Roman times and it may have later been used as a deer course between two late-medieval deer parks, before forming the distinct planted avenue that is a key element within the historic designed landscape. Its significance thus relates both to its importance as a designed element within the park as well as evidencing the long and rich history of the landscape.’*
- 3.13 The Oxford Approach and the Course combine to form a main historic and current principal approach to Stowe, from which the proposed development will be visible.

Defining the special qualities of local landscape designations in Aylesbury Vale District

- 3.14 This document (LUC, March 2016) provides evidence on the special qualities and values of locally designated landscapes within the district - the Areas of Attractive Landscape (AAL) and Local Landscape Areas (LLAs), to enhance the Council’s landscape evidence base and to inform the Local Plan. Stowe is designated as an Area of Attractive Landscape and is also noted in this document as being of international importance:
- ‘The local landscape designation of Stowe contains the peaceful and picturesque, gently rolling agricultural landscape in and around the internationally important landscape park and gardens of Grade I Stowe Registered Park and Garden, an 18th century designed landscape and recognised as one of Britain’s finest Historic Parks and Gardens. Blocks of ancient woodland, the remnants of the medieval Whittlewood Forest, and other parklands in the area contain great cultural and natural value, as well as rich visual texture and provide a wooded backcloth to the landscape. A landscape of streams, parklands and small villages of local materials with focal points of medieval church towers, mature oak trees and with occasional long views from vantage points.’*

4. Policy context

- 4.1 This section sets out the policy context relevant to this application from the national level (e.g. the National Planning Policy Framework) through to the site specific level (e.g. The Stowe Framework Conservation Management Plan. Rutherford, December 2012).

National Planning Policy Framework (February, 2019)

- 4.2 Section 16 of the NPPF Conserving and enhancing the historic environment sets out the Government's planning policies for England and how they should be applied.
- 4.3 Para 184 states that heritage assets '*should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*'

Proposals affecting heritage assets

- 4.4 The NPPF states:

Para.194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Para.195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Para.196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

Para.197. In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

- 4.5 The NPPF states:

Para.199. 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.

Para.200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Para.202. 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, where appropriate, securing its optimum viable use.

Para.203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Para.206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

*Para.207. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. **Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.***

Para.208. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Planning (Listed Buildings and Conservation Areas Act 1990

- 4.6 The following sections of the 1990 Act apply:

Section 66 General duty as respects listed buildings in exercise of planning functions (1) states '***in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority, or as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.***'

Section 72 General duty as respects conservation areas in exercise of planning functions (1) states '***In the exercise, with respects to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.***'

Other Guidance

- 4.7 Planning Practice Guidance for the Historic Environment (updated 23rd July 2019) is provided at <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.
- 4.8 Relevant Historic England Guidance includes Statements of Heritage Significance (HE Advice Note 12).

Aylesbury Vale District Local Plan (Written Statement Part 1, January 2004)

4.9 The following policies are of particular relevance to the application in relation to the historic landscape:

- GP40 – Retention of existing trees and hedgerows: ***‘In dealing with planning proposals the Council will oppose the loss of trees, particularly native Black Poplars, and hedgerows of amenity, landscape or wildlife value.’***
- GP53 - New development in and adjacent to Conservation Areas: ***‘In Conservation Areas the Council will seek to preserve or enhance the special characteristics that led to the designation of the area. Proposals for development will not be permitted if they cause harm to the character or appearance of Conservation Areas, their settings or any associated views of or from the Conservation Area. Proposals for development or redevelopment must respect the historic layout, scale and form of buildings, street patterns, open spaces and natural features in the Conservation Area that contribute to its character and appearance...’***
- GP59 – Preservation of Archaeological Remains: ***‘In dealing with development proposals affecting a site of archaeological importance the Council will protect, enhance and preserve the historic interest and its setting. Where research suggests that historic remains may be present on a development site planning applications should be supported by details of an archaeological field evaluation. In such cases the Council will expect proposals to preserve the historic interest without substantial change...’***
- GP60 - Development and parks or gardens of special historic interest: ***‘Development proposals within or affecting a Park or Garden of Special Historic Interest should take full account of the area’s historic and landscape significance. The Council will resist proposals that do not protect the distinctive characteristics of such Parks and Gardens.’***
- RA8 - Development in the Areas of Attractive Landscape and Local Landscape Areas: ***‘The Proposals Map defines Areas of Attractive Landscape, identified in the County Structure Plan, and Local Landscape Areas, defined by the District Council, which have particular landscape features and qualities that are considered appropriate for particular protection. Development proposals in these areas should respect their landscape character. Development that adversely affects this character will not be permitted, unless appropriate mitigation measures can be secured. Where permission is granted the Council will impose conditions or seek planning obligations to ensure the mitigation of any harm caused to the landscape interest.’***

Vale of Aylesbury Local Plan 2013 – 2033

4.10 There are several emerging policies in the Vale of Aylesbury Local Plan (VALP) of relevance to this application including:

- BE1 - Heritage Assets: ... ***‘All development, including new buildings, alterations, extensions, changes of use and demolitions, should seek to conserve heritage assets in a manner appropriate to their significance, including their setting, and seek enhancement wherever possible... The Council will b. Require development proposals that cause substantial harm to, or loss of a designated heritage asset and its significance, including its setting, to provide a thorough heritage assessment setting out a clear and convincing justification as to why that harm is considered acceptable. Where that case cannot be demonstrated proposals will not be supported unless the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss and accord with the requirements of national guidance, and c. Require development proposals that cause less than substantial harm to a designated heritage asset to weigh the level of harm against the public benefits that may be gained by the proposal, including securing its optimum viable use.... Developments affecting a heritage asset should achieve a high quality design in accordance with***

adopted SPD and the Council will encourage modern, innovative design which respects and complements the heritage context in terms of scale, massing, design, detailing and use.'

- BE2 – Design of New Development: *'All new development proposals shall follow the guidance set out within the Council's design SPD and shall respect and complement: a. The physical characteristics of the site and its surroundings including the scale and context of the site and its setting b. The local distinctiveness and vernacular character of the locality, in terms of ordering, form, proportions, architectural detailing and materials c. The natural qualities and features of the area, and d. The effect on important public views and skylines.'*
- NE5 – Landscape character and locally important landscape: *'The Policies Map defines areas of attractive landscape (AALs) and local landscape areas (LLAs) which have particular landscape features and qualities considered appropriate for particular conservation and enhancement opportunities. Of the two categories, the areas of attractive landscape have the greater significance. Development in AALs and LLAs should have particular regard to the character identified in the report 'Defining the special qualities of local landscape designations in Aylesbury Vale District' (Final Report, 2016) and the LCA (2008). Development that adversely affects this character will not be permitted unless appropriate mitigation can be secured. Where permission is granted, the Council will require conditions to best ensure the mitigation of any harm caused to the landscape.'*

The guidelines for landscape management in the Stowe AAL include *'Protect the existing woodland...'*.

Aylesbury Vale Landscape Character Assessment (JE Jacobs, May 2008)

- 4.11 The landscape guidelines for Stowe Registered Parkland (LCA 1.4) are framed under 'Conserve' and include:
- Support the work of the National Trust to conserve, maintain and restore the landscape of this LCA.
 - Encourage car free access to the area particularly from Buckingham with routes accessible to the less mobile and safe routes for cyclists of all ages.
 - Encourage the conservation and interpretation of features of historic and nature conservation interest.
 - Maintain the existing extent and condition of parkland.
 - Maintain the existing extent and condition of swamp.
 - Encourage access to the countryside for all sections of the community.
 - Identify key views from publicly accessible locations and promote the retention and enhancement of these views.
 - Ensure the preservation of archaeological earthworks by maintaining grassland.

Stowe Framework Conservation Management Plan

- 4.12 The Stowe Framework Conservation Management Plan: The School Estate (Rutherford, December 2012) includes the following general conservation policies of relevance:
- 2.2.6.3 *Respect and enhance the school layout of the 1920s and 1930s focussed on Chapel Court which established the framework for a high quality school campus set sensitively within the existing layout.*

- 2.2.6.4 *Ensure that modern school buildings and their environs fit easily together in the character of a united school campus and do not intrude upon or attempt to compete with the C18/C19 landscape views or character.*
- 4.13 The key issues identified in the Stowe Framework Conservation Management Plan: The School Estate (Rutherford, December 2012) are:
- *The wood forms the backdrop to the Home Park, and the division against Nelson's Walk.*
 - *The reinstatement of the circuit walk around the Home Park.*
 - *The importance of the site of the Pyramid, as a viewing mount, and its clearing and conservation.*
 - *The effect of intrusive buildings should be mitigated by planting and defining and managing as a discrete enclave within the designed landscape.*
- 4.14 The policy for the area is '*Maintain as a 'pretty shallow thicket' (Latapie, 1771), as established by 1779 as a wooded flowering shrubbery backdrop to the Home Park and the division against Nelson's Walk, and conversely as the backdrop to The Course above Nelson's Walk, screening views of modern buildings from the Course.*'
- 4.15 The recommendations for the area are:
1. *Maintain the woodland, thin where necessary, and underplant as a 'pretty shallow thicket' with flowering shrubs against the Walk.*
 2. *Reinstate as part of the sequence of wildernesses and of the circuit walk around the Home Park.*

5. Summary of responses provided by consultees

- 5.1 This section outlines the responses provided by consultees as part of the planning process where they are relevant to heritage and landscape matters.

Buckinghamshire Council Officers

Principal Heritage Specialist

- 5.2 The officer considers that the proposal would cause less than substantial harm to the significance of the heritage assets, but does not feel that the appropriate NPPF tests have currently been met in terms of avoiding, minimising or outweighing this harm. The officer notes that *‘Lee’s Bastion marks the transition of the two stages of the Walk’s (referring to Nelson’s Walk) development, this was one of the reasons why the music block was permissible, along with its design being felt to respond to the context. Therefore development south of this point would be contrary to this and should be guarded against.’*
- 5.3 In response to the latest information provided by the applicant including a suggested section 106 agreement to prevent further development on an area of land referred to as ‘the development strip’ the Heritage Specialist believes that the benefits suggested would not outweigh the less than substantial harm arising from the proposed development.

Senior Archaeology Officer

- 5.4 The officer is concerned over the relative lack of archaeological content in the Heritage Impact Assessment or its inclusion in the proposed mitigation measures.

Landscape Architect

- 5.5 The officer raises a number of concerns over the applicants LVIA judgements (the severity of the effects on landscape character of the site and the scale of the visual impact that would result from the development) and the LVIA/design process, which does not adequately consider alternative sites.
- 5.6 The officer concludes that the landscape and visual harms identified should weigh against the scheme in any consideration of the planning balance of the proposed development. She states that *‘I do not feel that the proposals complement the physical characteristics of the site and the surroundings, nor do they feel part of the historic scale and context of the landscape setting. This application would extend development into valued landscape, and I am unable to see how the visual and character impacts on the site and surrounding countryside as a result of the proposal, could be adequately mitigated’.*
- 5.7 In response to the latest information provided by the applicant, the officer remains *‘of the opinion that the previously developed identified sites within the school’s ownership would be less sensitive than the proposed site location and therefore potentially more suitable sites for the proposed development. These sites should be considered as an alternative location for the proposed development.’*

Tree Officer

- 5.8 The officer disagrees with the applicant’s advisors’ assessment that the proposed development will result in moderately low harm and that it will result in *‘severe harm in terms of arboriculture’* and that the mitigation proposed to limit impacts to retained trees is *‘not considered to significantly reduce this harm.’*

- 5.9 The officer also considers that the proposed development *‘is likely to have moderate to substantial remaining harm, which is unacceptable given the setting.’*

External consultees

Historic England

- 5.10 Historic England believe that the proposals will cause harm to the significance of Stowe through the permanent development of part of a garden feature. They consider that harm to be high (less than substantial) as it will *‘seriously compromise its historical interest and make the future restoration of this part of the garden impossible.’*
- 5.11 In response to the latest information provided by the applicant Historic England believe that the landscape benefits would not outweigh the harm and that the proposal to prevent development on land to the south of the application site through a section 106 agreement is a low-level benefit as any new development would be subject to the planning process and further rigorous assessment.

The Gardens Trust

- 5.12 The Gardens Trust strongly object to the proposed development and consider that the significance of the site has been downplayed. They suggest that substantial harm would be caused to the historic environment of Stowe and that the proposed mitigation and wider restoration works detailed in the application *‘cannot compensate for the loss of this area to irreversible development and the precedent that this proposal sets for further development alongside Nelson’s Walk.’*
- 5.13 The Gardens Trust urge that the application be refused and that an alternative site be selected in part of the already developed school campus.
- 5.14 In response to the latest information the Gardens Trust state that they have obtained legal advice regarding the application and that their objections remain as previously stated. They respond to the ‘Tilted Balance’ mentioned by Mr Danks and suggest that this is *‘more usually considered in relation to residential development but can apply to any kind of development where Local Plan (LP) policies are out of date. The NPPF para 11(d) states that where LP policies are out of date, the application should be approved unless it is in a protected area, or harm significantly and demonstrably outweighs benefit. ‘Protected Areas’ includes those designated under Habitats Regs., SSSI, Green Belt, Local Green Space, AONB, NP, and includes listed buildings and CA. The tilted balance therefore, with regard to the Grade I registered landscape of Stowe, should be tilted in favour of preventing harm, not allowing development in this context. Although that does not mean that consent could not be granted if the benefits in planning terms were sufficient to override the harm, in our opinion, the public benefits of the development in this place do not outweigh the harm to the historic environment, for all the reasons stated in our previous correspondence.’*
- 5.15 They also note that the Gardens Trust has asked several times for an objective and rigorous options appraisal and historic impact assessment of the various sites that could be considered, but that this has not been forthcoming.

The Georgian Group

- 5.16 The Georgian Group objects to the application and believe that the proposed building will *‘cause considerable harm to the registered landscape as a whole and contrary to the agreed policies set out within the Conservation Plan.’*

The National Trust

- 5.17 The General Manager of the Stowe & Aylesbury portfolio supports the application *‘as part of the wider context of the site...The creation of a new Pyramid walk will enable the public to engage with additional areas of the landscape and the creation of a circular route in this area will directly benefit visitors. The DT&E project and the proposed landscape restoration works offers an opportunity in respect of immediate restoration, conservation and improved visitor experience. It also has the*

potential to unlock further funds to enable the National Trust to accelerate the restoration of Stowe as a whole and single heritage asset.'

Pre-application advice

- 5.18 Aylesbury Vale District Council provided pre-application advice in advance of the current application in a letter dated 25th October 2019, following a site visit with Historic England in attendance on 27th February 2019 and following the submission of additional information by Stowe School and internal meetings attended by the Heritage Officer, the Planning Officer, the Tree Officer and the Landscape Officer.
- 5.19 The advice within that letter is consistent with the comments that have been made by Council Officers on the current application.

6. Review of the application in respect of the historic designed landscape

- 6.1 This section provides a review of the documents submitted as part of the application where they concern heritage and landscape matters.

Heritage Impact Assessment (DE Landscape & Heritage, November 2020)

- 6.2 The Heritage Impact Assessment (HIA) sets out the legal and policy context before describing ‘key designated heritage assets’ and their significance; the report provides a description of the proposed development and an assessment of the impact of the proposals on the significance of the ‘key designated heritage assets’ and an assessment of the effects of mitigation, before offering a conclusion.
- 6.3 Whilst there is much useful information contained within the HIA there are a number of detailed points or omissions which serve to downplay the significance of Stowe and the proposed development site including the following:
- HIA Chapter 3 suggests that Stowe is ‘internationally recognised’ and that it ‘involved ‘internationally celebrated architects’ but does not provide a clear assessment of significance of the Registered Park and Garden of Special Historic Interest that reflects the level of significance outlined in previous plans of studies (see Section 3 of this report). The only reference to a level of significance is consigned to a footnote noting that the Western Garden is assessed as national/international significance.
 - HIA Chapter 3 does not provide an assessment of significance for sub-character area 4B Pyramid Wood (refer to para. 3.9 of this report).
 - HIA Chapter 3 focuses heavily on individually listed buildings but there is no description and assessment of significance of key features of the Registered Park and Garden of Special Historic Interest, specifically those that lie adjacent to and that might be affected by the proposed development including the Oxford Approach and the Course. These features are highly significant elements of the designed landscape and integral to the understanding and enjoyment of the historic, architectural and artistic interest of the heritage assets.
 - The HIA does not include any historic mapping or images (as suggested in HEAG279 Statements of Significance, p.15) to help define significance and explain the role of the proposed development site within the historic designed landscape to a sufficient level of detail.
 - There is no assessment of significance of the existing trees as historic planted features, specifically two limes (T11 & 12) planted c.1875, a sycamore (T9) of c.1900, three limes of c.1910 (T13, T14 & T15) and an oak (T2) of c.1911.
 - There is no map showing the location of all heritage assets and features referred to in the text making it difficult to understand their spatial relationship with the proposed development site.
- 6.4 Chapters 5, 6 & 7 of the HIA understate the impacts of the proposed development on the heritage assets for the following reasons:
- The location map of the proposed development site is not clear and the blue circle does not reflect the full extent and scale of the proposed building.
 - Chapter 4 (description of the built and planted proposals for the scheme) only highlights the removal of T9 (mature sycamore) and makes no reference to the removal of other historic trees including T11 a lime of c.1875, T13 a lime of c.1910 and T2 an oak of c.1911. Chapter 5 makes

no reference to or assessment of the impact of the loss of these trees which form part of the heritage asset.

- The assessment of impacts on the Registered Park and Garden of Special Historic Interest (HIA paras 5.6 – 5.7) appears to focus on the assertion that the development will result in less than substantial harm, rather than a robust assessment of the impacts which would include loss of historic trees, loss of later woodland that continues to fulfil a historic design function, impacts on historic views and circulation and impacts on historic character.
- The assessment of impacts on the Registered Park and Garden of Special Historic Interest (HIA para 5.7 suggests that Stowe can accommodate ‘*such a discreet development*’ due to its ‘*scale and complexity*’ and ‘*its history of dynamic adaptation without undue harm to its significance.*’ There is no supporting analysis or evidence to suggest why the development is discreet or why there is not undue harm to its significance.
- Para 5.12 appears to be assessing the Music School rather than the proposed development.
- There is no reference in Chapter 5 to the impacts arising from the removal trees and how that will affect the sylvan backdrop to Home Park, which in turn affects the setting of the Grade I listed Rotondo and Grade I listed Queen Caroline’s Monument.
- Viewpoints from the Oxford Approach in the vicinity of Lee’s Bastion have not been considered by the HIA as they are considered to ‘*reflect current use and experience of this part of the RPG*’ and on the basis that the view from Lee’s Bastion was not reciprocal. The Oxford Approach and the Course are highly significant historic designed approaches to Stowe that are intrinsically linked to multiple listed buildings. As such, any impacts to this historic approach (e.g. loss of historic trees, loss of later woodland that continues to fulfil a historic design function, impacts on historic views and circulation and impacts on historic character) must be considered and included in the HIA.
- The reference to size of development relative to the overall size of the Registered Park and Garden of Special Historic Interest is used to downplay the impact of the development e.g. ‘*its modest size*’ (para. 5.30) and ‘*the size of the proposed development in relation to the RPG (0.13 ha: c. 500ha)*’ (para5.7) oversimplifies the level of impacts and does not overcome the fact that there will be harm.
- The HIA’s suggestion that the location of the proposed development is ‘*within existing development*’ (para. 5.30) is misleading as the development would extend the developed area into a site that currently contains no buildings and is largely an area of woodland that contains historic trees and fulfilled a historic design function.
- In Chapter 6 of the HIA there is a suggestion that the proposed DTE building’s ‘*modernist design, like that of the Music School, enables the building to respect “its C18 setting and (does) not attempt to compete with the C18 design”*’. The underlined portion of this statement is quoting the Historic Landscape Analysis & Conservation Statement which identified potential for new build in the area of Music School ‘*to which the present site is adjacent.*’ This statement does not consider the cumulative impact of the proposed DTE, the Music School and other more recent buildings (e.g. the West 5 Boarding House) and appears to use a previous study to justify the development as it lies adjacent to a site previously considered to be appropriate for development.
- Para 6.6 suggests that the proposed mitigation planting ‘*enhances and better reveals the significance of this area in accordance with NPPF Paragraph 200*’ [now para.206]. This overstates the positive impact of the proposed mitigation planting and fails to reflect the impacts associated with the addition of a new building within such a significant landscape. This positive impact is again overstated in para. 6.8.
- Para. 6.12, bullet 1 suggests that the proposed DTE is ‘*a recessive design that responds sensitively to the historic environment*’ without explaining how an understanding of the historic landscape has informed the design. Para 6.12 continues ‘*within the context of other existing*

development’ implying that development is therefore more acceptable without considering cumulative impacts.

- Para 6.12, bullet 2 suggests that *‘the screening of the building by period correct planting which simultaneously enhances the character of this part of the RPG and, by association, the setting of the listed buildings.’* This overstates the positive impact of the mitigation planting and fails to reflect the fact that the character of the historic designed landscape will be denuded.
- Para 6.13, bullet 3 downplays the impact of the visibility of the proposed DTE building by suggesting that *‘...by year 15, the impact of the proposed development experienced from these viewpoints (1&3) is substantially reduced through the combination of maturing planting and the context of existing development.’* This statement implies that the presence of existing development provides justification for further development, without adequately considering cumulative impacts and fully explaining the extent of harm to historic planting and character.
- Verified views 2 and 4 (Landscape Supporting Information, Appendix B) are not referenced in the HIA even though they show views from Nelson’s Walk, a key element in the historic designed landscape that will be subject to landscape and visual impacts.
- Viewpoint 1 (Landscape Supporting Information, Appendix B) which will be subject to change is not considered by the HIA even though this viewpoint relates to the Home Farm which dates to the 18th century and is a Public Right of Way from which the historic, architectural and artistic interests of the heritage assets can be understood and enjoyed.
- Viewpoint 13 (Landscape Supporting Information, Appendix B) *‘from which there is potential for rooftops to be seen’* is not considered by the HIA even though this viewpoint relates to the highly significant Buckingham Approach and Grade I listed Corinthian Arch and located adjacent to a Public Right of Way from which the historic, architectural and artistic interests of the heritage assets can be understood and enjoyed.
- Possible views from the wider parkland to the south (New Park) specifically the Queen’s Drive and the Perimeter Walk which are in part along the same line of a Public Right of Way from which the historic, architectural and artistic interests of the heritage assets can be understood and enjoyed are not considered. In this case the kinetic views provide sequential views to several of the listed buildings within Stowe Garden).
- Possible views in addition to those from the submitted verified viewpoints from Home Park from which the historic, architectural and artistic interests of the heritage assets can be understood and enjoyed are not considered.

LVIA and associated supporting information (Quartet Design, October 2020)

- 6.5 A detailed review of the LVIA has been carried out by the Buckinghamshire Council Landscape Architect (see Section 5 of this report) and I would concur with her views, which are not repeated in detail here.
- 6.6 In addition to the Landscape Architect’s comments, I would raise the issue of selection of viewpoints and mapping visibility (see Guidelines for Landscape and Visual Impact Assessment, LI & IEMA 2013, paras 6.6 – 6.12) as this is an essential stage in establishing the visual effects baseline and can play an important part in the different stages of the iterative design process. Critically it can *‘contribute to the early stages of site design and assessment to determine the potential visibility of a site compared to a similar development located on an alternative site...’* The LVIA doesn’t appear to include either a manual mapping analysis or Zone of Theoretical Visibility (ZTV) map to inform viewpoint selection or comprehensively analyse potential visibility. A ZTV would help address the final four bullet points of para. 6.4 above and is a fundamental building block for LVIA which has not been provided by the applicant.

- 6.7 Quartet Design have provided a response to the Landscape Architect's comments (dated March 2021) and in turn, the Buckinghamshire Council Landscape Architect has responded. I would also concur with her latest response, the most relevant points to the historic designed landscape being (in italics):

In my previous response I set out the existing baseline landscape character and visibility of the site, and identified both the landscape character and visual impact of the proposed application on the site itself and the wider landscape context. In summary, a building of the mass and scale proposed would have adverse landscape character effect on the proposed location and I am unconvinced that the proposed vegetation or wooded setting would 'hide' the building from view. The mitigation proposed to justify the site location would not be adequate or sufficient to eliminate the harm of developing this site. I do not feel that the proposals complement the physical characteristics of the site and the surroundings, nor do they feel part of the historic scale and context of the landscape setting. This application would extend development into a nationally () important valued landscape, and I am unable to see how the visual and character impacts on the site and surrounding context as a result of the proposal, could be adequately mitigated.*

- 6.8 (*) Please note that the valued landscape of Stowe has been consistently referred to as internationally important as per Section 3 of this report. This comment also applies to the significance that the LVIA assigns to Stowe, which is national rather than international (LVIA, para. 4.5).

The proposals have not changed and therefore my assessment of the landscape and visual impacts remains the same as my previous comments. The letter received from quartet design on 25.05.21 in response to my comments seeks to justify the siting of the proposal, 'in this location the building consolidates and coalesces with the existing adjacent school buildings' (1.0, pg. 1) the proposal has no relationship with the existing buildings and would exist as a separate entity located within the woodland. The proposed building is located within a unique landscape setting which greatly differs from existing school buildings, and therefore would not consolidate or coalesce with these.

'The majority of trees that are to be removed as part of the development are poor specimens and suitable replacements are to be provided to ensure that Pyramid Wood is retained and restored' (1.0, pg. 1) I fully comprehend that replacement trees proposed as part of the mitigation strategy would play a part in restoring the quality of the woodland but this cannot deflect from the issue that a large scale building is being located within the woodland setting, inherently changing the character of the site and imposing an urban influence on to it, permanently and significantly altering the baseline of the site.

- 6.9 I would add that the LVIA fails to sufficiently address the loss of trees of high and moderate quality as the Tree Survey Report (RGS, October 2020) states 'All A & B Category trees (high & moderate quality) will under normal circumstances be retained on development sites, and should ideally influence and inform the conceptual design, site layout, and in some cases the specific construction methods to be used...' The LVIA suggests that 'the Site has no physical features which would inhibit development, although serious consideration on the impact upon existing trees must be factored into tailoring the design around these existing trees.' Given the proposed removal of several high and moderate graded trees and impacts on others marked for retention, it is clear that tree retention has not been adequately factored into the design process.
- 6.10 The suggestion that 'The Majority of trees to be removed as part of the development are poor specimens' does not make the remaining minority of trees of better quality less important.

The letter notes that 'The proposal does not compromise this structural landscape design of the 18th Century or reduce its visual significance or its visual contribution to the wider Stowe landscape. The

intended function is retained within the landscape design' (2.0, pg. 2) I am unable to agree with this statement, the proposed development would wholly change this portion of Pyramid Wood, it would no longer be perceived as a woodland, which conflicts with the original landscape design of the 18th C and the Stowe Conservation Framework Plan: The School Estate (2012) which ensures the protection and restoration of this landscape. The letter further states 'The existing content of Pyramid Wood has been subject to change and devaluation over a considerable timescale and nothing remains of the original planting design of the shrub and understory elements. The resulting planting has become a mixture of self-seeded and invasive species combined with random contributions over the years' (2.0, pg. 2) Recommendations were made in 2012, but these have not been acted upon. The landscape improvements proposed as part of this application are not solely for the benefit of the historic landscape, they are proposed as mitigation for a large scale building. The fact that Pyramid Wood has been unmanaged is not a justifiable reason for siting a building within it.

The letter goes on to state 'The architecture, materials and positioning of the building will allow the building to fit in with the surrounding woodland character' and 'that the landscape character is retained and impact would be minimal' (2.0, pg. 3) I am unable to see how this building fits in with the surrounding woodland context of the site, the proposal is a large monolithic rectangle made of masonry, brickwork and glazing which is not reflective of the character or materials found in the woodland. I believe the impact on landscape character as a result of the development has been underestimated.

- 6.11 The application includes a number of landscape proposals that include mitigation planting as part of the Home Park restoration, mitigation planting as part of the West House development and Home Park restoration, a path linking Home Park with the position of the Pyramid and onto Nelson's Walk, additional woodland understorey planting in the remaining sections of Pyramid Wood and replacement specimen trees along Nelson's Walk. With the exception of the proposed path these measures focus on the screening of the proposed buildings, but the majority are proposed on the lower slopes so are unlikely to replace the distinctive skyline woodland backdrop currently provided by Pyramid Wood.



Figure 6.1: Extract from Quartet Design Landscape Architects drawing QD770_104 showing wider restoration elements

7. Conclusions

- 7.1 This report provides a review of application 20/03822/APP for a proposed new Design Technology & Engineering (DTE) building for Stowe School.
- 7.2 The need for the School to continue to provide outstanding facilities and the contribution that it makes to the conservation of Stowe is understood and clearly stated in the material submitted with the application.
- 7.3 The DTE application has been under development for several years and Council Officers and Historic England have provided pre-application advice. The proposed DTE scheme appears to have changed very little despite that pre-application advice and therefore the same concerns remain and are repeated in the Council Officers and Historic England's responses to the current application.
- 7.4 Having reviewed the application for a new Design Technology & Engineering (DTE) building I would provide the following conclusions:
- ***The proposed development site lies within a heritage asset of the highest significance which has been described by multiple experts as of international importance*** (A Grade I Registered Park and Garden of Special Historic Interest in England) that contains multiple component features (including Grade I listed buildings) in close proximity. Stowe's designation as a Conservation Area and as an Area of Attractive Landscape further reflects its significance and sensitivity.
 - ***The proposed development site (Pyramid Wood) has been described*** in the Stowe Framework Conservation Management Plan: The School Estate (Rutherford, December 2012) ***as being of grade A significance (national or international significance)***.
 - ***The applicants HIA and LVIA downplay the significance of Stowe and the proposed development site and understate the impacts of the proposed development.*** Both documents and subsequent correspondence responding to Council Officers comments seek to justify the proposed development, rather than provide robust and objective assessments. Council Officers have sought to address this by providing feedback, but that has not been taken on board by the applicant's advisors. Due to the concerns and omissions identified in Section 6 of this report these supporting documents should not be relied upon to make an informed planning judgement and Council Officers' own judgements, along with those of their appointed advisors, should be given greater weight in the planning balance.
 - ***The proposed development is not consistent or compatible with existing the local policy framework*** including Aylesbury Vale District Local Plan, 2004 (policies GP40, GP53, GP60 & RA8); Vale of Aylesbury Local Plan (policies BE1, BE2 & NE5); Aylesbury Vale Landscape Character Assessment, 2008 (landscape guidelines) and the Stowe Framework Conservation Management Plan, 2012 (general conservation policies 2.2.6.3 & 4 and policy and recommendations for area 4B).
 - ***The level of harm to the designated and undesignated heritage assets is considered to be less than substantial, but the level of harm would be high and at the upper level of that scale*** as the proposed development will result in the following impacts:
 - The felling of four 19th and early 20th century trees and impacts on the root protection zones of three other trees that are likely to date to the third Duke of Buckingham's replanting and restoration and his daughter, Lady Kinloss' tenure that are classified as grade A (high quality) and B (moderate quality) in the tree survey. As stated in the applicant's own tree survey report, trees of such quality would be expected to be retained on a development site. This rule should be applied with additional weight, given the significance of the development site and its specific role in the designed landscape as a sylvan backdrop. The tree removal will remove physical evidence of the

evolution of the historic designed landscape and render remaining historic trees highly vulnerable as construction will take place within their root protection zones.

- The removal of the historic trees and the later 20th century specimens will result in the loss of an important band of woodland that has served to provide a wooded backdrop to the Home Park and the Oxford Approach and The Course for over 280 years, resulting on a negative impact on the setting of multiple listed buildings and loss of a key element of the 18th century landscape design.
 - The replacement of the woodland with a large scale, rectangular building will fundamentally change the historic and current landscape character of the site that prevents the perpetuation of the wooded backdrop and skyline in the way it was historically intended. Aside from the loss of woodland with its associated canopy, shrub layer and ground flora, the underlying landform will be fundamentally altered by foundations and retaining walls.
 - The presence of a large-scale rectangular building will result in significant visual impacts for those walking to Lee's Bastion and along Nelson's Walk where the building would become a defining feature. In turn this would result in a negative impact on the setting of the Grade I Boycott Lodge.
 - A new large-scale building south of the new Music School, in an area that contains no buildings and is predominantly woodland, will result in a continuation of built form and extension of urban character, rendering the heritage assets ever more vulnerable to adverse visual impacts, particularly in winter and in the event of tree loss through disease, pests, climate change, lack of management or storms.
- ***The full extent of heritage and landscape and visual impacts is not yet fully understood*** due to the lack of either a manual mapping analysis or Zone of Theoretical Visibility (ZTV) map to inform viewpoint selection or comprehensively analyse potential visibility. This could result in the need for further verified viewpoints to examine impacts in parts of the Park and Garden of Special Historic Interest that have yet to be considered.
 - ***The cumulative impact of piecemeal development in the area surrounding Pyramid Wood and including the proposed development has not been considered*** which is important given that 'the most significant landscape effects are likely to be those that would give rise to changes in the landscape character of the study area so as to result in significant effects on its key characteristics and even, in some cases, to transform it into a different landscape type.' GLVIA, 2013). The school has also highlighted that there are additional future plans in terms of further proposed development and these have the potential to result in even greater cumulative impacts.
 - ***There is a clear need for an options appraisal and masterplan for the whole of the Stowe School Estate that is integrated with the National Trust Estate.*** The approach to development at Stowe appears to be being driven by current operational needs and market demands/funding availability, rather than a nuanced and creative approach to meeting those needs whilst respecting, conserving and enhancing the heritage assets.

- 7.5 Pyramid Wood is a highly significant and sensitive location for the proposed development. Development here would be harmful to the character and appearance of the area and would not preserve the special qualities of the settings of the listed buildings or the Registered Park and Garden of Special Historic Interest and Conservation Area.
- 7.6 The public benefits would need to be substantial to outweigh the harm. The proposed landscape mitigation and wider restoration proposals should be given relatively little weight, given that level of harm.