



INSTALLATION OF CAST IRON RAILINGS

BIDDULPH GRANGE GARDENS

SUPPORTING STATEMENT INCLUDING HERITAGE IMPACT ASSESSMENT

OCTOBER 2022 (Updated March 2024)



**National
Trust**

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Introduction

This statement supports applications for planning permission and listed building consent for the creation of a new set of metal railings at Biddulph Grange Garden.

The applications were originally submitted in 2020, reference SMD/2020/0004 for the planning permission and SMD/2020/0005 for the listed building consent. SMD/2020/0005 was subsequently withdrawn with a revised application made in 2021, reference SMD/2021/0827. SMD/2020/0004 and SMD/2021/0827 have since been withdrawn and a new revised application has been made in 2024.

This statement responds to concerns raised by Biddulph Town Council, the Victorian Society, The Gardens Trust and Staffordshire Gardens & Parks Trust (jointly), and Historic England. In addition to describing the proposals and changes made to the design of the railings, this statement considers the heritage impact of the proposals and the justification for the work proposed.

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Legislation and national policy

Legislation

s1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 includes curtilage structures earlier than 1948 within the definition of a listed building. s7 requires listed building consent to be obtained for any works affecting the character of a listed building. s18 imposes a duty to have special regard to the desirability of preserving listed buildings, their settings and features of special architectural or historic interest when deciding applications for listed building consent. s66 extends this duty to the exercise of other planning functions. s72 imposes a similar duty to pay special attention to the desirability of preserving or enhancing the character and appearance of conservation areas.

Overall policy approach

The National Planning Policy Framework (NPPF), revised in December 2023, sets out the government's policies for planning. Paragraph 3 states that the Framework should be read as a whole including its footnotes and annexes.

Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development.

Paragraph 8 sets out the three dimensions of sustainable development: economic, social and environmental with paragraph 9 noting that they are not criteria against which every decision can or should be judged.

Paragraph 11 sets out a presumption in favour of sustainable development. This includes approving proposals that accord with an up-to-date development plan and where there are no relevant policies or they are out-of-date, granting permission unless policies in the Framework provide a clear reason for refusal or the impacts

would significantly outweigh the benefits.

Heritage

Chapter 16 sets out policies for conserving and enhancing the historic environment. It states that heritage assets are an irreplaceable resource that 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. The framework requires applicants 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. Local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Great weight should be given to the conservation of designated heritage assets and any harm should require clear and convincing justification, with less than substantial harm being weighed against the public benefits of the proposal. (NPPF 2023 paragraphs 195, 200, 203, 205, 206, 208).

Annex 2 of the Framework defines setting of a heritage asset as, "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

Heritage assessment methodology

The Trust has followed the approach set out in Good Practice Advice in Planning 2 – Managing Significance in Decision-Taking in the Historic Environment (2015) and Good Practice Advice in Planning 3 – The Setting of Heritage Assets (2017).

In addition we have had regard to general Historic England guidance, such as its Conservation Principles, Policies and Guidance (2008), Historic Environment Advice Notes 2 Making Changes to Heritage Assets (2016) and 12 Statement of Heritage Significance: Analysing Significance in Heritage Assets (2019).

Significance

The National Planning Policy Framework defines significance as ‘the value of a heritage asset to this and future generations because of its heritage interest’. Such interest may be archaeological, architectural, artistic or historic’ and it may derive ‘not only from a heritage asset’s physical presence, but also from its setting’. HEAN12 notes that significance is what conservation sustains, and where appropriate enhances, in managing change to heritage assets.

Managing Significance in Decision-Taking

GPA 2 suggests a six-step approach:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable

development objective of conserving significance and the need for change;

6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

HEAN12 also sets out steps 1-4 above while additionally making explicit a step prior to these: understand the form, materials and history of the affected assets.

Settings of heritage assets

GPA 3 reiterates the definition of settings as the surroundings within which a heritage asset is experienced. It advises that the importance of setting lies in what it contributes to the significance of the heritage asset or allows significance to be appreciated. It sets out a five step approach to considering effects on setting:

Step 1: identify which heritage assets and their settings are affected;

Step 2: assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;

Step 4: explore the way to maximise enhancement and avoid or minimise harm;

Step 5: make and document the decision and monitor outcomes.

Sources consulted

A Souvenir Guide: Biddulph Grange Garden Staffordshire, Stephen Anderton for the National Trust, 2019

Biddulph Grange Garden [National Trust Guidebook], 1992 revised 2004

Biddulph Grange Garden, Historical Research & Survey Report, Michael Lear and Beverley Woods for National Trust Mercia Region, 1987

Biddulph Grange, Staffordshire: A Victorian Garden Rediscovered, Peter Hayden 1989

Conservation Area Appraisal draft for consultation, Staffordshire Moorlands District Council, 2008

Gardeners Chronicle 1856 and 1862, articles by Edward Kemp, 1856 letter by James Bateman, accessed through archive.org

National heritage list entries

National Trust archives

National Trust Historic Buildings Sites and Monuments Record

Ordnance survey mapping, 1877 onwards

Representations by Historic England, The Victorian Society, Staffordshire Gardens & Parks Trust and The Gardens Trust, and Biddulph Town Council

Garden Memoranda.

BIDDULPH GRANGE, THE RESIDENCE OF JAMES BATEMAN, ESQ.—It is now nearly six years since a lengthened description of the gardens at Biddulph Grange appeared in these columns; and since that time a very large amount of additional ground has been enclosed and arranged, including many novel and striking features. The death of Mr. Bateman, sen., has enabled his son to dismantle the old hall at Knypersley, which had become spoiled, as a place of residence, by the proximity of large iron works and coal pits, and to remove numbers of its architectural and other ornaments to Biddulph Grange, though the kitchen gardens and fruit houses at Knypersley are still retained, and still continue to supply the family at the Grange. The acquisition of additional land, too, has, in some instances, led to other alterations. And, as the whole place forms one of the most remarkable examples of artistic and practical gardening in the country, with respect especially to the arrangement and cultivation of hardy plants and to garden decoration, it has been thought that an extension of the previous account, to embrace the more recent changes, would be interesting to both the amateur and the professional reader.

In order to give the necessary distinctness and significance to this description, however, and to convey some more definite idea of a design which, after all, neither words nor plan can accurately portray, an engraving of the principal part of the grounds is annexed. The smallness of the scale of this plan is of course fatal to anything like perfect clearness. And no

Heritage assets

The proposals are within the grade I registered historic garden of Biddulph Grange Garden (NHLE 1000115).

The proposals are within Biddulph Grange Conservation Area, designated in 1977. It includes Biddulph Grange, Biddulph Grange Gardens and Biddulph Grange Country Park.

The proposals would alter the grade II listed building “Stone Seat and Arbour in Lime Walk approximately 15m south of Biddulph Grange” (National Heritage List Entry 1037841)

The proposals are close to the grade II listed building “The alcove and approach steps at north end of Lime Avenue” (NHLE 1374761) and have the potential to affect its setting.

The proposals are close to the grade II* listed building of Biddulph Grange (NHLE 1037835) and have the potential to affect its setting.

The proposals are close to the grade II listed building “Formal steps and approach to Bateman’s Study at Biddulph Grange” (NHLE 1374724) and have the potential to affect its setting.

The register entry mentions grade II listed ornamental iron gates at the south end of the Lime Avenue. The gates described don’t have a listing on the national heritage list. However, we have considered their significance and potential effects on their setting.

There are numerous other listed buildings within Biddulph Grange Garden, as well as the Church of St Lawrence and buildings associated with it. Other than those identified above, the distance and separation of other listed buildings from the proposals allows their significance and any potential impacts on them to be addressed by considering effects on the registered park and garden and the conservation area.



Registered historic park and garden boundary,
© Crown copyright and database rights 2022 Ordnance Survey 100023974



Listed buildings near the application site
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Biddulph Grange Garden & Biddulph Grange Conservation Area

The elaborate gardens at Biddulph Grange, were the imaginative creation of James and Maria Bateman in the mid-19th century aided by their friend the artist Edward Cooke. The ambitious designed landscape features a number of enclosures and thematic gardens that transport the visitor on a journey between imagined places and provide varying conditions suited to plants from around the world that were then becoming available to gardeners. Part of the excitement of the garden is the experience of exploration and discovery as the visitor travels through the gardens.

The gardens were modified in the late 19th century and simplified in the early 20th century. They suffered increasing neglect and vandalism in the 1960s before being extensively restored by the National Trust in the late 20th century.

The gardens were opened to visitors by the Batemans and featured in lengthy articles in the Gardeners Chronicle in 1856 and 1862.

The 1856 article highlighted, “The production of an unusual number of separate and independent scenes... the complete isolation and the distinctive characteristics of certain parts of the place... any person may be taken round the place in two or three separate circuits, each exhibiting entirely new features... the paths through these several tracts all communicate with the leading general walks and the effect of the isolation of parts is not attained by the usual trick of the labyrinth, or by “walks that lead to nothing.”

The 1862 article described a waiting room and outside waiting area, where visitors would wait until an attendant was ready to accompany them. It also commented, “the public... can be admitted at once into the heart of the grounds without going through the house or passing in front of any of the principal windows,” and,

“The Lime avenue leads to a garden gate, which is the gate of exit for visitors.” Also, “The public are admitted to these gardens free on the first Monday in the months of May, June, July, August and September; and by tickets on all Fridays (except Good Friday) throughout the year... To foreigners and persons from a distance, who may declare themselves unacquainted with the regulations, tickets are issued on other week days. No admission is given, under any circumstance, on Sundays.”

Registered park and garden

The exceptional significance of the park and garden is recognised in its inclusion at Grade I in the register of historic parks and gardens. The headline description is, “Gardens and pleasure grounds of 1840s-60s, with discrete ‘world gardens’ including China and Egypt, associated with a country house.” The garden also has significance as part of the setting of the house and other listed buildings.

Conservation Area

The conservation area encompasses the house, formal gardens and an associated area of woodland, meadowland, lake and a stream valley which was formerly part of the wider Bateman estate. The 2008 draft Conservation Area Appraisal summarises the interest of the Conservation Area, “The Biddulph Grange Conservation Area seeks to preserve and enhance a unique Victorian Garden created by James and Maria Bateman, between 1841 and 1870.”

Stone Seat and Arbour in Lime Walk

The arbour and seat were listed grade II in 1987. The listing has not been updated subsequently. The description is, “Seating enclosure, platform and seat. Circa 1860 by John Bateman. Sandstone. Rectangular enclosure approximately 8m x 4m formed by ashlar plinth entered to north-west side; stone seat with panelled back set to south side. The enclosure is set above and to the west of the steps (q.v.) starting the perambulation of the gardens. It is the ideal and possibly intended position for viewing the layout, especially the Egyptian portal (q.v.).”

Although described as being in Lime Walk, the Arbour is some distance above the Lime Walk and not directly accessible from it.

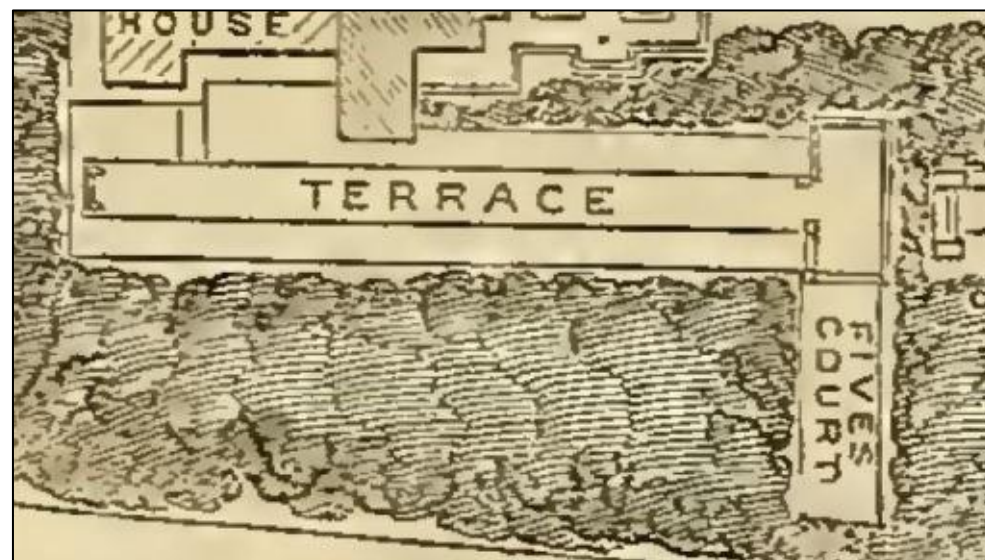
The Stone Seat was repositioned along the West Terrace in about 1990 as part of the restoration of the gardens. Re-siting the seat to its original position was not possible because the West Terrace was extended in the late 19th century to create a through path that now serves as the main visitor entrance to the gardens. This northwards extension of the terrace probably dates to Heath’s access alterations when he had the neighbouring highway re-routed.

The Terrace and Arbour were described by Kemp in 1862. “[The west] terrace, while affording beautiful views of the grounds and the country, acts as an excellent screen to the adjoining High Road, and without appearing to have any such object, completely excludes the road from the principal windows of the house. From its summit, too, the eye passes pleasantly along an avenue of old Limes, on a much lower level, which was formerly the high road...” and, “the new western terrace... will be finished by a raised platform at the southern end. The view peculiar to this platform is that along the Lime avenue, planted with a scalloped fringe of box, but it also

(Continued on page 10)



The Arbour from the West Terrace, 2022



1862 plan showing the stone seat at what was then the north end of the terrace, rather than on the arbour

yields an ample prospect of the country to the West, and of the general grounds.” The wording suggests that the Arbour was possibly under construction during Kemp’s visit in 1862. The as built layout differs slightly from 1862 plan, with the terrace path entering off-centre.

The view to the Egyptian portal mentioned in the list description is now obscured by the restored Shelter House and hedges, as it would have been historically, but the Arbour still provides excellent views over the gardens.

The register entry for the gardens, updated 1999, describes the Arbour as a bastion with views to the south and east. In management of the gardens at Biddulph Grange, it is known as the Bandstand. The origin of this name is unknown and there is no evidence of it being historic or coming from past use of the area.

The Arbour has significance as a surviving construction from Bateman’s expansion of the gardens in the early 1860s and a place for viewing the garden and house. Trees now obscure the view along the Lime avenue and views to the west, although the latter would otherwise show modern development. The view to the east takes in the restored Dahlia Walk, rebuilt Shelter House, the Grange, formal steps and the tops of the hedges in the parterres and Mrs Bateman’s garden.

The top of the Arbour appears intended to have been part of a visual stop to the Lime Avenue (see p11). It also formed a visual stop to the south end of the West Terrace. From elsewhere in the garden, the top of the Arbour is an incidental element of oblique and sideways views rather than a significant feature. People on the Arbour would have been more noticeable.



View from the Arbour, 2022



Zoomed in view of the Arbour from top of the steps by Mr Bateman’s study, 2022

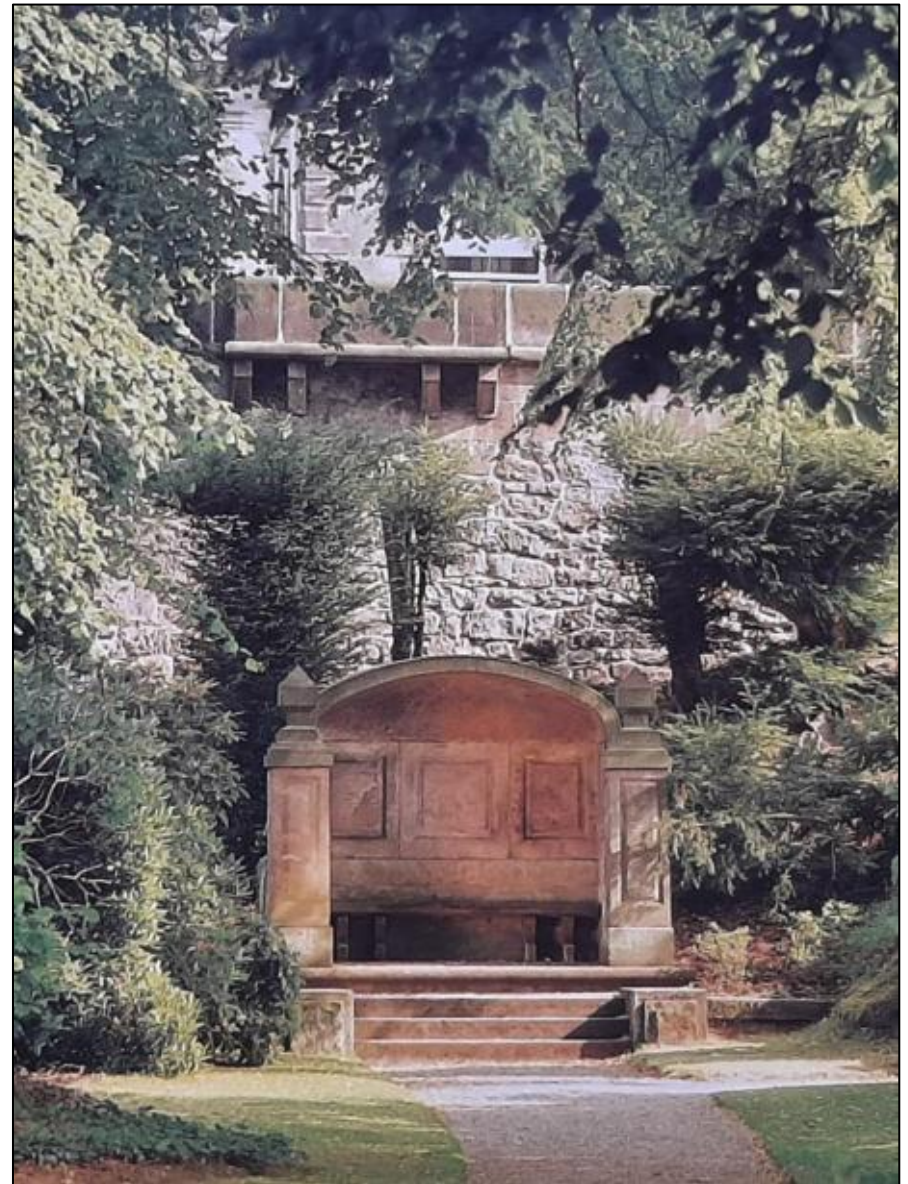
Alcove and approach steps at north end of Lime Avenue

The list entry describes this as, “Ornamental garden building : seating alcove and approach steps. 1848-1860, by John Bateman. Dressed stone. Three steps approach elliptically-arched alcove cover approximately 2m wide, supported by moulded and panelled square columns; 3-panelled rear wall and stone seat on shaped legs.” The National Trust guidebook states that the seat was designed by Edward Cooke.

The Alcove was shown on the 1862 Kemp Plan but not mentioned in the article, despite it describing the neighbouring Lime Avenue and the neighbouring Rainbow, which was, “being planted with a row of strong-coloured Rhododendrons or Azaleas. The sorts are not yet sufficiently selected...” This western area of the garden appears to have been a work in progress in 1862, having been part of the high road when Kemp visited in 1856.

The Alcove has significance as a surviving feature from Bateman’s garden attributed to Cooke and providing both a visual stop to the Lime Avenue and a place from which to admire the Avenue.

The Alcove is separated from the Arbour by evergreen planting, which currently prevents any view of the Alcove and Arbour together. However, a photograph from the National Trust Guidebook, taken c.1990, does show both structures, as well as showing the transition from rubble to ashlar for the upper part of the Arbour. This detailing suggests that the top of the Arbour was intended to be seen in combination with the Alcove, with plants only concealing the rougher stonework. The National Trust intends to lower the planting on this side of the Arbour once the railings are in place so that the view of the Lime Avenue from the Arbour will be re-opened. This will also re-open a reciprocal view in which both Arbour and Alcove would be seen together.



Alcove with the Arbour seen above, c.1990,, from National Trust Guidebook
Credited NTPL/Ian Shaw

Biddulph Grange (building)

Biddulph Grange was built for James and Maria Bateman from 1842 onwards overlaying an earlier farmhouse/vicarage with an Italianate villa designed by Bateman and gradually altered and extended. Hayden comments that the design brought the garden into the house, incorporating a rhododendron house (later the fern house), camelia house, conservatory corridor and orangery. Following the death of James' father John in 1858, many architectural features were brought from Knypersely Hall to Biddulph Grange.

James and Maria Bateman moved out of Biddulph Grange in 1868 and the house was passed to their son John. In 1871, it was sold to Robert Heath, a leading Staffordshire industrialist. Heath's son made extensive internal alterations to the house only to see it largely destroyed by fire in 1896. The house was rebuilt in stone, in an English Baroque style. The surviving wings were retained with modifications, such as replacing the Camelia House by a drawing room.

In 1923, the house was converted to a hospital. The hospital use ceased in the late 1980s and the house was converted into private apartments, with a small area acquired by the National Trust to support opening the garden to visitors. The building includes a geological gallery relating fossils to the Biblical story of creation. This has been restored and is open to visitors as it was historically.

The more than special historic interest of Biddulph Grange is recognised in its listing at Grade II*. The house also has significance as part of the setting of the garden and an influence on its design. In 1856, Kemp noted, "all the ground in front of the principal windows, and that which come into direct association with the house, has an artistic character peculiar to itself."



Biddulph Grange from the tower of St Laurence's Church, c1886
National Trust archives



Biddulph Grange in 2022, from the Arbour

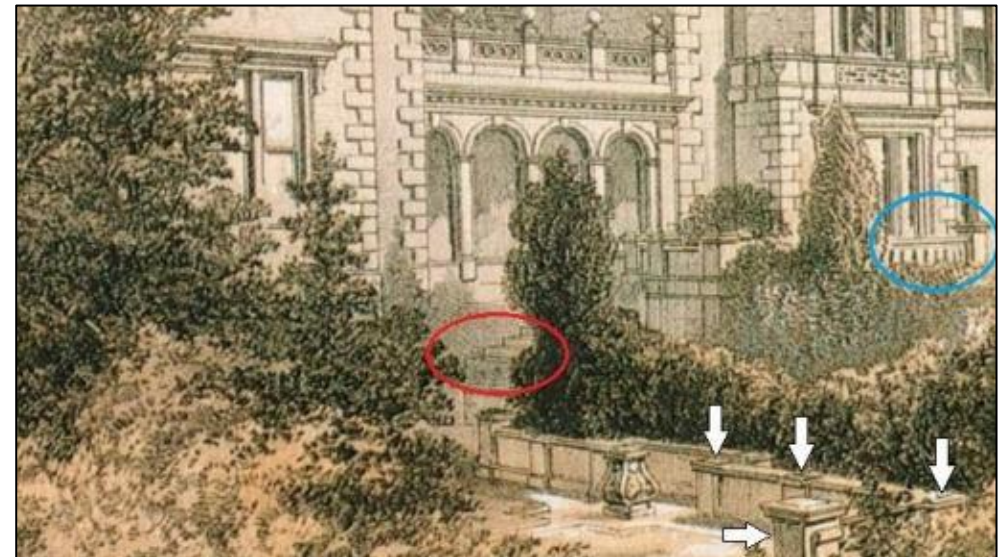
Formal Steps and Approach to Bateman's Study

The listing describes these as garden steps 1848-1860, by John Bateman. It comments, "The steps front Bateman's personal study and therefore presumably mark the intended debut of the main perambulation of his grounds." The listing details note an amendment to change the title to refer to Heath's study but this appears not to have been actioned. The register entry describes the steps as leading to Heath's study.

Instead of steps to the study, the 1862 plan is consistent with what had been described in 1856, "From the library... the ground descends at once to a platform on the level of the parterre, and there are steps from the terrace to this point, and to a walk which starts from the house, opposite the centre of the library window, and passes all round the grounds." In 1856 and 1862, access to this parterre was via steps by the Camelia House, running parallel to the house. In 1862 Kemp noted that the parterre was being modified.

An 1871 engraving from the sales particulars, shows the bottom of a flight of steps parallel in front of the Camelia House (circled red), seen over the low wall of the parterre below the library. A section of terrace balustrade can be seen further right (circled blue). The steps now seen, fundamentally altered this view, although a section of parterre wall remains (marked by arrows). An 1886 photo from the church tower (p12) shows a lightweight metal canopy over the library window rather than the half-dome on stone pillars now seen but it is not possible to see whether the steps were in place by then.

The steps have significance as part of the Heath alterations to Biddulph Grange and a viewing and entry point for the garden. The parterre below has significance as a survival from the Bateman period and a likely starting point for his walks around the garden.



Detail from engraving of Biddulph Grange from the 1871 sales particulars, Camelia House steps circled red, arrows to stone piers in situ in 2022



Similar view in 2022—stone piers matching the 1871 image marked by arrows, although in this view they are now hidden by plants to varying degrees

Ornamental iron gates at the south end of the Lime Avenue

The register entry states, “The west side of the garden is bounded by the curving Lime Avenue, which is set slightly below it. The Avenue predates the Batemans' arrival at Biddulph; before 1840 it ran parallel to the Biddulph to Congleton highway which linked Biddulph church and vicarage. A walk leads down the Avenue, from a stone alcove seat (listed grade II) at its north end to ornamental iron gates (listed grade II), probably designed by Edward Cooke, surmounted by gold spheres, at the south end. From the gates a drive led on to the Batemans' other home, Knypersley Hall.”

The 1862 article stated, “The Lime avenue leads to a garden gate, which is the gate of exit for visitors, and there will be a lodge opposite.” In 1862, this was the boundary of the garden with the high road. Heath subsequently had the road re-routed.

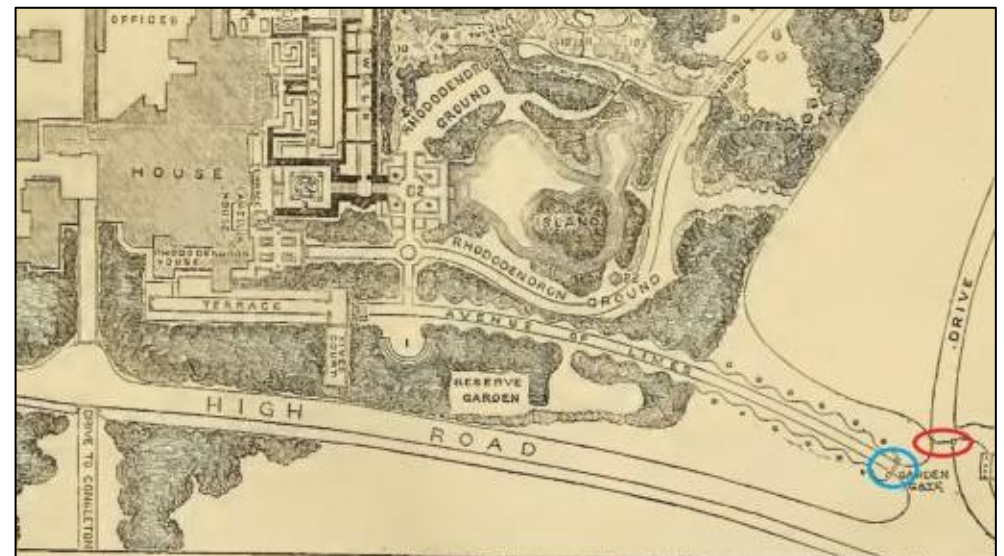
There is no listing for the gates described in the register entry. There is a listing (1037839) for “Garden gateway to Biddulph Grange approximately 70 metres south east of Church of St Lawrence.” This is a small stone gateway near Congleton Road possibly associated with Heath's highway alterations.

The gates now at the Lime Avenue came from the neighbouring carriage drive leading to Knypersley Hall. They were moved about 15m to the Lime Avenue in the National Trust's garden restoration. They have significance as a surviving feature, albeit relocated.

The curve of the Lime Avenue prevents intervisibility between the application site and the ornamental gates. This was noted by Kemp in 1862, “[The avenue] is so curved that its termination cannot be seen.” However, the gates and proposed railings will be experienced sequentially by visitors to Biddulph Grange Gardens with each potentially influencing the experience of the other.



The ornamental iron gates at the south end of the Lime Avenue



Detail from the 1862 Kemp plan, *Gardeners Chronicle*, East at the top
Original position of the gates in red, current position in blue

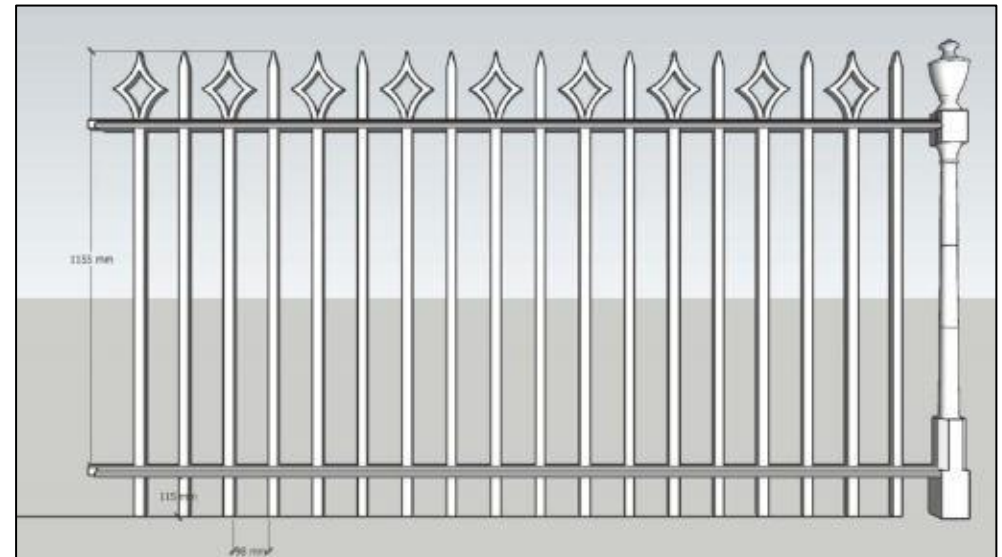
Proposed railing design

Responding to the concerns raised to the designs previously proposed, we discussed options with Alan Taylor from Staffordshire Gardens and Parks Trust before commissioning a revised design from Peter Meehan of the Historic Metalwork Conservation Company. The design is based on iron railings on Congleton Road, Biddulph, outside what was the school built by John Bateman (James Bateman's father). The railings also echo details of the Lime Walk gates.

The proposed iron railings are simplified by omitting the dog bar finials, which are not needed because of the wall behind. The spacing and height meet modern safety requirements for places accessible to children under 5. The star finials and spikes would be subtly blunted for safety. The railings would be painted black green, like other railings at Biddulph Grange, with no picking out of features in contrasting colours.

The railings would follow the recess of the south parapet rather than continuing straight across. Railings and posts in the recess would rest on the stone slab rather than being fixed to it but the posts at the return would attach to the stone slab for stability. The railings would guard all areas where the parapet is above a significant drop and would be taken to the nearest logical stopping points beyond: the north west corner of the Arbour and the where the parapet wall of the West Terrace meets the Arbour.

The initial proposals included a concrete raft across the Arbour to address concerns about voids within the structure and to provide a firm foundation for the railings. Further consideration has enabled this to be reduced to a concrete strip. Other than where existing stone paving would be retained, the Arbour would be surfaced to match the west terrace.



Proposed railings © Peter Meehan



Railings on Congleton Road, © 2022 Google, image taken Oct 2021

Heritage Impact

Introduction of the railings would change the appearance of the grade II listed Arbour and Stone Seat. It would no longer be as open as it originally was and there would accordingly be some harm to its significance as a surviving piece of the Bateman gardens of the 1860s. This change would also harm the significance of the grade I registered historic park and garden and the character and appearance of the conservation area. The design now proposed would minimise this harm by being in keeping with the spirit of the Arbour and this section of the garden while echoing local railings from a similar date which have Bateman connections.

However, the Arbour is currently fenced off for safety reasons using temporary mobile fencing, with visitors unable to gain access. Installation of the railings would enable the Arbour to be re-opened to visitors. This would restore the intended use of the Arbour as a viewing platform and enable better appreciation of its significance. Removal of the temporary fencing would also improve its presentation. These gains would also apply to appreciation of the registered park and garden and conservation area.

Once the railings are installed, the National Trust would be able to lower the height of the planting between the Arbour and grade II listed Alcove. This would again reveal the view along the Lime Avenue from the Arbour described in 1862. It would also reveal the combined view of Arbour over Alcove as the northern termination of the avenue that appears to have been intended. The railings would be seen in the view from the Avenue but it is considered that the view with railings would be better than the current situation with the Arbour screened from view completely. Without the proposed railings, this view could only be reinstated if the Arbour remained closed to visitors.

The railings would be partly visible from the grade II* listed Grange and the grade II listed Formal Steps and Approach to Bateman's Study. In each instance they would be an incidental component of oblique views. They would make the Arbour more visible, although they would be less noticeable than people on the Arbour and West Terrace. It is considered that this change would not harm the significance of the Grange or the Steps and that it would not harm the ability to appreciate that significance.

The railings would not be visible from the ornamental gates at the other end of the Lime Avenue. However, they would be experienced sequentially in a relatively short distance. The use of the repeating pattern of spikes and star finials would provide an echo of the gates in the railings. The railings would not affect the significance of the gates and are considered to be neutral in terms of impact on the ability to appreciate that significance.

The strip footing would provide stability to the railings with least impact on the character and historic fabric of the Arbour. Fixing into the stone slab at the recess on the south side is required but has been kept to only two corner posts. The alternative would have been to pull the railings back from the south wall which would have resulted in a less satisfactory appearance detracting from the character of the listed building, conservation area and historic park and garden.

The proposed surface material is similar in character to present and past surfaces of the Arbour and would match the West Terrace surfacing. Existing stone paving at the step into the Arbour and on the south side of the Arbour would be kept and would remain visible.

Justification

There are considerable drops on the West, East and South elevations of the Arbour, ranging from 1.06 to 4.19 metres. The average height of the parapet wall around the Arbour is 429mm, less than 18 inches. This is very low and offers little protection from falling over the wall should a person lose their balance, trip, or fall.

Biddulph Grange Gardens welcomes large numbers of visitors. The income they provide is essential to the ongoing conservation and presentation of the gardens. It also provides a way in which people can appreciate the gardens and associated buildings.

The Arbour is close to what is now the main visitor entrance to the gardens and to the tea room, which is also a significant source of income for the gardens. This location leads to a high concentration of visitors in the area, including families with young children. The low wall and views out attract children. Concerns over safety have led to the Trust closing off the Arbour as a way of preventing accidents.

The railings are proposed as a way of safely re-opening the Arbour to visitors. They would meet modern standards for guarding drops in areas frequented by children under 5. These standards govern both the height of the railings and the spacing between uprights.

Research undertaken in developing the proposals has emphasised the importance of the view from the Arbour along the Lime Avenue and also the likelihood that the top of the Arbour was intended to be on show in the view of the Alcove from the Lime Avenue. Once the railings are installed, these views could be safely restored.

Revisions to the design following the consultation responses received and through further discussion with the Staffordshire Gardens and Parks Trust have, we believe, minimised harm to the

heritage of Biddulph Grange Gardens.

We consider that the harm would be more than justified by the public benefit of being able to safely re-open the Arbour to visitors. The re-opening of views that would subsequently be possible is a benefit that should also be taken into account.