



ENGLISH HERITAGE

NORTH WEST

Ms Sarah Westwood
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Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

Our ref: P00235181
Your ref: 3/2012/0942
Telephone 0161 242 1430
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29 April 2013

Dear Ms Westwood

re: **Notifications under Circular 01/2001, Circular 08/2009 & T&CP
(Development Management Procedure) Order 2010.
Land at Higher Standen Farm, Clitheroe, Lancashire.
Application no. 3/2012/0942**

Thank you for consulting English Heritage regarding the amended application for the above site. In essence the amendments comprise two additional documents: a supplement to the Design and Access Statement and a Regulation 22 Supplement which, in relation to the historic environment, provides a Heritage Impact Assessment (HIA).

Our advice regarding the original application, dated 15th November 2012, did not raise objections to the principle of developing the site. However we advised that the application did not contain an adequate assessment of the significance of the designated heritage assets affected by the proposals, and the contribution that setting makes to their significance, to allow a thorough assessment of potential impacts to be made and appropriate mitigation measures to be incorporated into the development.

In response the submission of the HIA, incorporated into the Regulation 22 Supplement, is welcome. The HIA provides a detailed assessment of the relevant designated and non-designated heritage assets adjacent to the site, including Standen Hall (listed grade II*), The Old Bothy (II) immediately to the north of the Hall and the cottages at Littlemoor (II). The HIA considers the development in the context of the Historic Environment Planning Practice Guide and our guidance on The Setting of Heritage Assets.

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The Supplement concludes that the findings of the Environment Statement, originally submitted with the application, remain unaltered and that without mitigation the impact on the Old Bothy and Littlemoor would be moderately adverse and the impact on Standen Hall would be slightly adverse. Taking mitigation into account, the Supplement argues that the scheme would have a minor adverse impact on the Old Bothy and Littlemoor and a neutral impact on Standen Hall. From a planning policy perspective the impact on the historic environment is considered to be harmful, but is judged to be 'less than substantial harm' as defined by paragraph 134 of the National Planning Policy Framework.

The HIA refers to impact of the rural and partly wooded setting of Standen Hall and the relative quietness and lack of nearby development contributing to the feeling of seclusion. While the immediate grounds of the Hall are tightly defined the HIA refers to the association with the Old Bothy, potentially as the original home farm to the Hall. The map regression also highlights that the wooded area on the northern side of Pendleton Brook was not planted until the late C19th, prior to which the Hall would have been more prominent in the wider landscape. However, the association between the Hall and wider agricultural area, and its contribution to the setting of the Hall, is not explored further.

In respect of the setting of the Hall, view 17 is considered in detail. It is stated that this view from the east of the Hall is only accessible from private property, however a very similar view is gained from the public road immediately east of the Hall. The deciduous trees planted along Pendleton Brook provide considerable visual permeability below the tree canopy. The visual impact of glimpsed views of the development to the north of the woodland would have a significant impact on the aspects of setting summarised above. The diurnal impacts of lighting are also likely to be quite intrusive and undermine the relative isolation of the Hall and its associations with the agricultural land and properties immediately to the north. The HIA (section 5.3.12) refers to the historic associations with the Old Bothy and High Standen Cottage, but does not consider them to be within the curtilage of the Hall. However, it is the impact on setting, rather than curtilage, that is the key issue to be considered and the HIA appears to down play the potential impacts on the designated heritage assets, particularly the Hall and Old Bothy.

In mitigation a narrow area of planting, to strengthen the edge of the existing woodland on the northern side of Pendleton Brook, has already been identified outside of the planning application boundary. Additionally, the area immediately north of the woodland would be developed as the final phase of the scheme to allow the new planting time to mature, to some extent. However, based on the submitted information there is no certainty that this form of mitigation will be adequate in screening the development from the very significant eastern view of the Hall. The Parameter Plan identifies a green buffer area around the Old Bothy, but describes it as a minimum of 10 metres, which appears to be less than the area illustrated on the

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plan. At ten metres the screening benefits of the green buffer are likely to be negligible. The phasing plan in the Design and Access Statement explains how the development 'could' be phased over a 15 year period, and so the potential short-medium term impacts on the setting of the Hall are unknown.

Based on the available information it seems unlikely that the proposed green buffer area and woodland planting would be sufficient to screen the development completely from the designated heritage assets and we believe that the impact on the setting of the Hall would be harmful, rather than neutral, while the impact on the setting of the Old Bothy would be quite fundamental and certainly represent more than minor adverse impact.

We agree with the overall assessment of the Regulation 22 Supplement that the impact on the significance of the designated heritage assets would be harmful and that paragraph 134 of the National Planning Policy Framework applies. Therefore the LPA should weigh the likely harm against the other public benefits of the proposals. In doing so the LPA should be mindful of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness (NPPF paragraph 131). The need to satisfy all three aspects of sustainable development jointly and simultaneously (NPPF paragraph 8), including the need to contribute to the protection of the historic environment, should also be key to the determination of the application. The desirability to preserve or enhance the setting of a listed building as set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 also needs to be taken into account in weighing the impacts and benefits of the scheme.

However, in assessing the application we recommend that further consideration is given to achieving a more sensitive approach. For example, a more substantial buffer zone, within the application site boundary north of Pendleton Brook could help to achieve a more effective screen to the Hall. By pushing the developed area further north the topography may also help screen the development from the eastern driveway to the Hall. A more generous green space has already been provided to the west of the Hall and will probably ensure that the proposed development does not impact on views from the western frontage. Similar consideration could be given to the northern side of the Hall. The future context of the heritage assets could also be managed more effectively if the parameters were more detailed and more precisely defined. For example, the current Parameter Plan could be supplemented with a phasing parameter plan. A more detailed landscape parameter plan could also be provided to indicate a wider green buffer between the development and Standen Hall. The Design and Access Statement and Landscape Framework refer to a 'swale'

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in the green area running along the northern edge of Pendleton Brook wood, however the current parameter plan does not appear to refer to this feature. A further parameter describing the potential minimum and maximum scale of buildings, including width, height and depth, could also assist in managing the likely enclosure to the green buffer and the potential impact on the setting of the Hall. In this respect photomontage views from the Old Bothy and also the eastern driveway of the Hall could be requested to illustrate the likely impact and visibility of the scale and massing of the proposed buildings, accepting that the detailed design will not be known at this outline stage.

I hope the above comments are helpful in assessing the additional information submitted in support of the application and if you require any further advice with respect to the historic environment impacts of the scheme please do not hesitate to contact me.

Yours sincerely



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