

Patrons Sir Mark and Lady Lennox-Boyd : President Mr Robert Parker DL

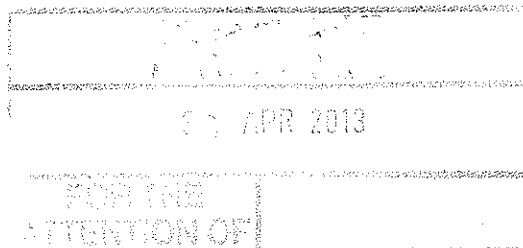


Lancashire Gardens Trust
Conservation & Planning Group

29 April 2013

Your ref: CONLGT/3/2012/0942

Director of Community Services
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA



For the attention of Sarah Westwood

Dear Sir/Madam

Planning Application No: 3/2012/0942 (Outline: All Matters Reserved)
Land at Higher Standen Farm and Part Littlemoor Farm, Clitheroe

Thank you for your email of 9 April inviting the Lancashire Gardens Trust (LGT) to comment on the Design and Access Supplement and secondly the Supplement to the Environmental Statement for the above application. Whilst both these documents are helpful in providing additional detail, the LGT has fundamental issues as many of the concerns raised in our initial letter of 16 November 2012 remain to be addressed.

Design and Access Supplement

(Response to LGT comments on views from the site)

This document responds specifically to the LGT's initial representations with regard to important views of Clitheroe Castle Keep from the subject site. The LGT has set out its further response to the various points made in the Supplement in the attached table. The LGT concerns remain, in that the aspirations for retention of views out of the site set out in the original DAS cannot be delivered through the layout indicated in the indicative masterplan.

Regulation 22 Supplement to 2012 Environmental Statement (25 March 2013)

This Supplement responds to representations made by a number of consultees in addition to the LGT with regard to heritage, landscape and drainage issues. The LGT's concerns are in respect of heritage assessment and in particular with regard to the heritage designed landscape (i.e. gardens, grounds and parkland) to Standen Hall.

In the LGT's letter of 16 November it was stated that there was no evaluation in the original application of the 'significance of the grounds and estate core'. It would be

expected that a full survey analysis and assessment of the gardens and parkland of Standen Hall would be covered in the Supplement to the Environmental Statement. There are omissions in the Supplement where the methodology and conclusions fail to address the initial comments made by the LGT. The following paragraphs are noted within the Supplement.

2.2 Overview of Additional Work Completed

This defines the Heritage Assets intended to be assessed. Designated and undesignated assets are listed, however these are limited to buildings and structures, whilst the gardens and parkland are not referred to. The gardens and designed landscapes associated with Standen Hall need to be specifically included in the additional work.

2.3 Amendments to the Scope of the Assessment

The requirements of the LGT for an assessment of the designed landscape has not been addressed.

2.5 Implications for the ES

The analysis cannot determine that there is no change to the conclusions in the original ES as the assessment of the complete undesignated assets has not been undertaken. The gardens and designed landscapes to Standen Hall should be listed as a receptor in Table 2.1.

Appendix A Cultural Heritage Additional Information - Heritage Impact Assessment

2.5 Four OS extract plans are reproduced covering the period 1847 – 1932. In each of the four plans the southern part of the garden and surrounding land to Standen Hall is cut off at an arbitrary line just south of Standen Hall itself, and excluded from the image in the report. This indicates that the gardens south of the Hall have not been seen as relevant to the Cultural Heritage assessment.

The Standen Terrier of 1870 is referred to as naming 'parkland' west of the Hall, but there is no survey or assessment of the implications of this feature. Surveys are required to determine what evidence remains of the extent of this parkland and any surviving features, its relationship to the Hall and gardens, and therefore its significance. It is understood that the grounds contain a ha-ha - which would be expected to be related to parkland on the western side of the garden (this feature is visible near the present right of way). All these points remain unanswered and unaddressed.

The Clare Estate Plan of 1893 is reproduced and at least shows the garden area in full. However, the description of the garden in the report is limited to a single sentence and most of the features shown on the plan are not discussed. A rose garden is mentioned from an historic photograph (now lost). There is no explanation of where this rose garden may have been located or what other features were included in the design. All the features shown on this interesting 1893 plan require to be considered and assessed, including a detailed explanation of survival, evidence on the ground of any lost past features and understanding of how the garden may have been used and enjoyed in conjunction with the Hall, (see also references to 4.2.2 below).

3.2.7 Some surviving gateways and entrances are recorded and photographed. The LGT welcomes the incorporation of this additional information to support the Heritage

Impact Assessment. As stated in the LGT's original representation, the DAS should include the intention to incorporate these precedents from the surviving cultural landscape into the final design for the public realm in any future development.

4.2.2 There is acknowledgement of absence of any map evidence of a planting scheme for the gardens and designed landscape and it is noted that "it is possible that further investigations of the gardens may provide evidence of this". This need for investigation remains as outstanding work requiring to be undertaken. Planting is only one attribute for a garden (and possibly the most likely to be changed), and all the designed landscape features past and present require to be surveyed and assessed, (see comments on 2.5 above).

4.3.2 It is stated that "Standen Hall is considered to be of exceptional significance for evidential, historic, aesthetic and communal values". The designed landscape/ grounds therefore should be accorded the same significance. This then would provide a firm basis for the undesignated assets to be subject to the necessary rigorous scrutiny and evaluation.

5.3.3 The south drive is mentioned, (also in 5.3.1); but its location is not shown and its significance not determined. Views are mentioned, most of which (other than at 7.3.21) are not located or their relevance/ importance explained. The walled gardens are not fully described or assessed.

5.3.9 Environmental Conditions – No plans are shown of the locations of views from the Hall to the north to explain the text. See also 5.3.2.

6.3.2 RVBC Core Strategy definition of a Heritage Asset: 'Heritage asset includes designated heritage assets and assets identified by the LPA (including local listing)'. The LGT concludes that the complete heritage designed landscape associated with Standen Hall falls within this definition, because of the exceptional significance of Standen Hall (see 4.3.2 above). Note that NPPF Para 128 requires the level of detail to be proportionate to the asset's importance.

7.3.26 There is a reference to the LGT's survey work of 1980 (which was of a high level). The LGT is aware of further, more detailed survey work being required regardless of the current planning application.

9.7 Conclusions: Given that the survey and assessment in Appendix A is incomplete, the consequences for the undesignated landscape associated with Standen Hall cannot be assessed or understood.

Conclusion

The LGT therefore considers that the present assessments are inadequate for the reasons set out above.

In the initial letter of 16 November the LGT advised that it envisaged further survey work is intended at a future date. There is no timescale for this work to be undertaken, which in any case would require the agreement of the landowner in order to gain permission for access.

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If any matter within the consultation response above requires clarification please contact Stephen Robson on 01772 795602 or Stephen.e.robson@btinternet.com in the first instance.

Please note that this response is being emailed to Jane Tucker and we understand hard copy is not necessary.

Yours faithfully

Elaine Taylor

Holly Hill, Old Hall Clough, Lostock, BOLTON BL6 4LB, Lancs
Tel: 01204 496 696 : e: elainemtaylor@talktalk.net

Land at Higher Standen Farm and Part Littlemoor Farm, Clitheroe: planning application no 3/2012/0942
Design and Access Supplement March 2013 – LGT Response

<p>Standen Estate, Clitheroe</p> <p>IBI Taylor Young's response to Lancashire Garden Trust comments on views from the site</p> <p><i>Background</i> The Design and Access Statement (DAS) contains a Landscape Framework which sets out the principles that will drive a high quality development and provide guidance which should be applied in future Reserved Matters applications. This includes a recognition of the need to provide views to Clitheroe Castle and other views that reinforce local identity and provide a sense of character. The DAS also includes an Illustrative Master Plan that shows how, in outline form, the development could respond to the objectives and principles that the DAS sets out. This illustrative plan is necessarily broad brush at this stage – a greater consideration of the issues and a more detailed response must be sought and delivered at the reserved matters stage. This paper expands on the information in the DAS in order to provide surety that the design principles can be met.</p> <p>It does not attempt to provide the finely detailed and fully resolved design response appropriate to the reserved matters stage.</p> <p><u>Response</u></p> <p>LGT has identified an important view of Clitheroe Castle at a specific point on Worston Old Road and expressed concern about its loss. Intermittent views of the Castle are available at points along Worston Old Road but these are generally interrupted at eye level by the hedgerow in the foreground and, by hedgerows, trees and development around Shays Drive in the middle distance.</p> <p>The (following) photographs illustrate this point.</p>	<p>LGT's response to IBI Taylor Young's additional information</p> <p>The LGT welcomes the intention within the masterplan to retain key views to Clitheroe Castle.</p> <p>Whilst it is acknowledged that the Illustrative Plan is necessarily broad brush, however as it sets out the key principles for the proposed development, some revisions are required to identify the important views and show how they can be retained. (See further below)</p>
<p>Photo-locations 1 – 6 inclusive illustrate the existing varied range of open, glimpsed and partly-screened views available from Worston Old Road across the proposed development site to Clitheroe and the Castle Keep. LGT acknowledge that it would neither be possible nor indeed necessary to retain each of these views within the context of the proposed mixed use development. Some views have greater value and resonance within the context of the local area than others. Of necessity the views which LGT have drawn attention to are from outside the development as there is only limited public access to the site. From within the development area, the Worston Old Road hedge would not be an obstacle to these views, with the rising land within the site allowing improved views towards the Castle and Keep.</p> <p>The view from photo-location 4 (i.e. that which accords most closely with the Illustrative Plan's green corridor/ right of way is one of the poorer views. The</p>	

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<p><i>Page 10</i> Recognising the restricted nature of these views across the site the DAS places greater emphasis on views out of the site from within. The Illustrative Master Plan shows how opportunities for permanently secured views within the development can be incorporated. These are linked to public routes through the layout, particularly on the higher parts of the development site to the east. This includes the existing PROW from Pendle Road to Worston Old Road (view 8) and a new public route in a green corridor which bisects the site and links to Worston Old Road (view 7).</p>	<p>views from photo-locations 2 and 3 are more important, and this why LGT drew attention to this location in our initial response. To retain this key view from within the development will require some revisions to the Illustrative Plan. (See response above)</p>
<p><i>Page 12</i> The DAS establishes the principle that key views out of the site, including the Castle, are important and should be responded to (p60 & p77). The exact nature of both glimpsed views and more structured views will be determined in detail at the reserved matters stage when a detailed layout for the site will be available and the form of the proposed buildings within the development known.</p>	<p>(See response above)</p>
<p><u>Conclusion</u> The Illustrative Master Plan identifies that revealed views towards the Castle can be included in the layout – these are from new and existing public routes within the site which can provide an opportunity for clearer, less restricted views of the Castle Keep than are currently available from Worston Old Road. Glimpsed Views of the Keep from Worston Old Road looking through the new development can be incorporated in the final layout. The best opportunity for this might be along the line of the new public footpath onto Worston Old Road as the alignment of the Castle at this point avoids housing development around Shays Drive. (View 7) The detail of this will need to be considered at the reserved matters stage</p>	<p>The LGT welcome this acknowledgement of the potential for views to the Castle and Keep from the view shown in photo location 7. Indeed, this location is shown on the Analysis Plan shown on page 20 of the DAS as one of the 'Important Views towards Clitheroe'. To retain this view will require some realignment of the proposed footpath corridor in a more northerly angle i.e. towards the end of Shays Drive, and an adjustment to the Illustrative Plan. This revised alignment would then builds upon that identified as an 'opportunity for creating connections' in the Analysis Plan on page 20 of the DAS. The LGT recommends that the Illustrative Plan is revised to show the intention to retain these key views. In addition, appropriate conditions should be attached to any planning permission.</p>

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<p>when the final form and location of proposed buildings will be known.</p> <p><i>Original Design and Access Statement:</i></p> <p><i>(Excerpt from Original DAS p59): Contextual Driver: Key Vistas and Views</i></p> <ul style="list-style-type: none"> • <i>The Roman Road: a green corridor and primary pedestrian link will be created along the line of the historic north-south Roman Road</i> • <i>The Ride: A strong east-west landscape corridor will be created to link views east to Pendleton Moor and west to the Bowland Fells</i> • <i>Views to Clitheroe Castle will be maximised from the development.</i> 	<p>LGT wishes to ensure that the principles set out within the DAS are carried forward in the development's detailed design. Key views currently available towards Clitheroe Castle and Keep from within the development site should be retained. The current outline application layout would not enable this, and this requires appropriate revisions to the Illustrative Plan</p>
<p><i>(Excerpt from Original DAS p77) Views – A number of views are identified on the Development Principles diagram as of importance, these are both out of and through the site. Within a site of this size legibility is very important, within the illustrated masterplan this is built around a series of vistas that are set along key routes and spaces.</i></p> <ul style="list-style-type: none"> • <i>Key vistas should be terminated with focal buildings.</i> • <i>Key views of surrounding landmarks, such as Clitheroe Castle and St James' Church Tower should be respected and enhanced along green corridors.</i> • <i>Sensitive views into the development site should be well considered and terminated appropriately.</i> 	<p>The LGT wants to ensure that these aspirations are delivered.</p>

