

**From:** [REDACTED]  
**Sent:** 21 August 2022 11:10  
**To:** Planning  
**Cc:** Kathryn Hughes  
**Subject:** Application 3/2022/0623



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Good Morning,

I outline below objections to Application 3/2022/0623

The premises, which sit entirely within the Grade II registered Woodfold Park, were originally constructed as a stud business. This 2006 development evolved from the original 2001 proposal for a large racing stable. Permission for the new build business & house was an enabling provision of a development to restore the listed Woodfold Hall and Orangery which had both lain derelict since the 1940's. Enabling development *de facto* introduces harm. An occupancy condition was attached to the Stud dwelling, confirming the business as the primary reason for the approval of the new development on green belt land.

Recently, following initial refusal, the occupancy condition was varied as a pre-cursor to purchase by the applicant. The officer's delegated report to the application resubmitted as 3/2022/0267 states 'the variation would still restrict the occupation of the building to an agricultural or equine worker relating to the immediate land'.

The Stud has appeared vacant for some time now. Whilst the applicant may own the land he does not manage it or work on it. The agricultural business that now operates on site is managed by a local farmer who has rented the land. It is noteworthy that the agricultural use of the parkland is noted on Historic England's At Risk register as 'further diminishing the character of the landscape'.

In the absence of a viable business which requires on site management the justification for residential accommodation has fallen away. Para 2.8 of the planning statement confirms the removal of the 'recent rural enterprise addition to Woodfold Park'. If the applicant has no use for the stables then the logical conclusion is that the outbuildings & ménage at least, & potentially also the house, no longer have a reason to be there.

In that context, the proposed conversion & subsequent disproportionate extension to the residential premises should not be countenanced within the green belt setting of a Grade II Park which is at risk 'as a result of progressive redevelopment'. The proposals are completely incongruous with the historic registered park. If granted the property would occupy a larger footprint than the principal building, Woodfold Hall.

The indication at para 2.8 of the planning statement that the owner plans to 'upgrade' elements of the land in future causes further concern.

Since the 2006 construction of the Stud, Woodfold Park has been placed on the At Risk register, so conservation is now a priority.

The planning statement selectively references NPPF and core strategy policies. At 4.2 it uses the Local Plan proposals map and 'terminates' (by way of a red line) the registered park at the Borough boundary, rather than at the Park boundary that extends into the boroughs of Blackburn & South Ribble. The statement fails to take account of the Park as a whole & does not recognise the impact of the development from the south of the park where it is clearly visible, to considerable detriment, from the footpath opposite the Clog & Billycock.

It particularly fails to mention Historic England's Good Practice Advice in Planning Note 3 which makes plain the significance of an asset does not depend on public access, and deals with cumulative change *'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset'*. The GPA note advocates maximising enhancement and avoiding/minimising harm. 'Enhancement' points to the removal of redundant buildings and reinstatement of the parkland.

Relevant NPPF paragraphs seem to have been overlooked - 189 'these assets are an irreplaceable resource'; 194 requirement to describe significance of heritage assets affected; 195 local authorities to identify and assess the particular significance of any heritage asset/setting affected by the proposal; 196 'where there is evidence of deliberate neglect or damage to a heritage asset, the deteriorated state should not be taken into account'; 199 'great weight should be given to the asset's conservation'; 200 'any harm should require clear & convincing justification'

In relation to Core Strategy policies referenced in the planning statement:

DMH4 requires proposals to have no damaging effect on the landscape and be consistent with conservation of the natural beauty of the area. It also requires the character of the buildings to be converted to be appropriate to their surroundings, and for the building to have a genuine history of agricultural or rural use. The stables have no history (as indicated by the planning statement reference to 'recent rural enterprise' at para 2.9) Their conversion and extension, with unsympathetic materials & large expanses of glazing will further damage the setting of the historic asset. To repeat, the HE At Risk Register points to the progressive redevelopment as a contributing factor to its decline.

Likewise DMH5 does not support residential extensions that cause visual harm to the landscape or fail to improve the visual quality of the site.

EN5 confirms a presumption in favour of the conservation & enhancement of the significance of heritage assets and their settings.

DME4 expressly states that proposals causing harm or loss to RPG, including their setting, will not be supported.

There is no heritage statement included with the application despite being located in a RPG, and the setting of a number of listed buildings.

There are protected woodlands immediately to the north & west of the development and no tree survey is submitted.

The bat survey relates to the stable buildings only, not the garages or main house that are included in the proposal as extensions. It does however make lighting recommendations which may conflict with the extensive use of glazing in the design.

There are no existing elevations to assist in assessing the visual impact either from the public footpath and Further Lane to the north, or the Park to the south.

The scale, design and large areas of glazing incorporated into this proposal are damaging to the setting. The extensions are disproportionate. There is no conservation element. The presence of harm - arising from the enabling consent in 2006 - cannot justify further harm (Planning Inspector, in relation to the Mellor Lodge appeal, Dec 2015). The damage to the historic park setting will be immeasurable & in accordance with the core strategy the application should not be supported.

Regards,

[Redacted signature block]