



Lancashire Gardens Trust
Conservation & Planning Group

1 September 2022

Your ref: 3/2022/0623

Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

For the attention of Kathryn Hughes

By email only to planning@ribblevalley.gov.uk

Dear Sir/Madam

Planning Application No: 3/2022/0623;
Proposed conversion of former stud farm stables to form part of residential dwelling and extensions to existing property; Woodfold Park Stud, Woodfold Park, Mellor, BB2 7QA. GT Ref: E22/0707.

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. The Lancashire Gardens Trust (LGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites and is authorised by the GT to respond on GT's behalf in respect of such consultations.

We have reviewed the application documents in relation to this planning application and visited the site. Woodfold Park is a Registered Park and Garden (RPG) Grade II, an extensive park laid out in the late C18 for Henry Sudell, now subdivided into multiple ownerships relating to the conversion of the various estate buildings into residential dwellings. The Park includes numerous listed buildings, all Grade II: Woodfold Hall c1790, three lodges, Orangery, two bridges and an Icehouse. The Park extends to approximately 175Ha and is enclosed to a greater extent by a perimeter wall of approximately 6.5km, although deteriorating, notably part of which lies within the boundary of the current application. The Park extends over the wooded valley of Arley Brook and includes a number of lakes and ponds. Although the listing description gives no indication of the designer, there is a remarkable likeness to other sites laid out by John Webb (1754-1828). However, further research is required to substantiate this.

The Park is on Historic England's At Risk Register, which notes the impact of the subdivision: *'the progressive redevelopment has impacted significantly on the historic character of the designed landscape in the immediate vicinity of the principal buildings'* and that agricultural land use of the parkland *'is further diminishing the character of the landscape'*. The assessment concludes that there are significant localised problems, and that the Park has high vulnerability and is on a declining trend.

There is a need to address the decline of the RPG. If approved, the current application would compound the problems, therefore we object to the proposal for the following reasons.

1 Lack of Evidence within Application Documentation:

The application documents make no analysis and assessment of the impact of the proposals on the significance of the heritage assets, nor any evaluation and assessment of visual impact on their context and setting.

The Planning Statement informs that the stud enterprise failed due to viability issues. However, no evidence of the viability issues or for marketing of the property has been provided for either this application or for the earlier application 3/2022/0267 for variation of condition.

2 Harm to Heritage Assets:

NPPF Paragraph 194 states

"194 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:

Grade II listed buildings, or grade II parks or gardens, should be exceptional;"

3 Scale of Development:

To enlarge the present residential property would compound damage already suffered to the RPG. The proposals are for an extended dwelling of nearly equal or larger scale than the historic Woodfold Hall, and where both can be viewed from within the Park. It is likely that both properties can be seen from the same viewpoints, but this should be clarified through a visual assessment.

4 Green Belt

The construction or extension of a large residence on Green Belt is against RVBC's policies.

5 RPG At Risk

There is the need to secure the future of this Grade II RPG because it is now 'At Risk' due to unsuitable development within it. Past and present harm should not be compounded by more harm to the park, its estate buildings and their setting.

'Setting' describes the surroundings in which we enjoy the heritage asset. Setting can be within the asset or outside it; the important approach from Mellor Lodge and Middle Lodge, although now just a faint track in the meadow, is part of that setting and offers an unparalleled vista across the valley, to the ridge beyond, and then swerves round to the front of the Palladian mansion. It is one of the county's finest approaches in true Georgian Landscape Style. Part of that vista is to the Deer House; rising above the little single-storey building is the wide profile of the stud farm, a building out of historical and

visual context. When leaves have fallen the stud farm's outline is even more prominent, for five months of the year.

The historic stone boundary wall north of stud farm site is collapsing in several places through neglect, and we would recommend that this wall itself should be listed in its own right at least in the 'local list' category. The woodland in this location appears to demonstrate a lack of management. Furthermore the intensification of agriculture in the parkland where arable use is replacing pasture is placing pressures on the surviving mature trees where we understand recent lopping has taken place to trees covered by a TPO. These current proposals will result in an exacerbation of the 'At Risk' status.

We consider that the current application will be harmful to the significance of the RPG and should be refused.

We have drawn attention in relation to application 3/2022/0322 (the Deer House) that the RPG has no Conservation Management Plan (CMP), although we understand that this was intended as a s106 requirement from the original 2001 planning permission, no Plan has emerged or can be located. Subsequent sales and subdivision of the estate including the Hall, Orangery and Farm and other properties have made this matter complex and difficult to address, as well as the involvement of three separate local authorities. Hopefully, now that Historic England have recorded the historic asset as At Risk, there may be a way forward. In the meantime all three local authorities should decline to consider any further development within the Park until a CMP is in place. The stud farm property covers a very large proportion of the RPG and this application should not be determined before the strategy and timing for drawing up the CMP has been resolved.

If there are any matters arising from this please contact LGT on

[REDACTED]

Yours faithfully

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