



Lancashire Gardens Trust
Conservation & Planning Group

4 January 2023

Your ref: 3/2022/0988

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: 3/2022/0988;
Proposed erection of one private dwelling with landscaping and demolition of equestrian development; Adjacent to Further Lane and Woodfold Park, Mellor, BB2 7QA. GT Ref: E22/1416.

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 forms part of the south boundary of the current application site and is in very poor condition. 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 listing description for the RPG attributes design of the mansion to Charles McNiven, and the Character Study which supports the current application suggests the parkland also by this designer. We are not aware of any

evidence for the suggestion.

Woodfold Park At Risk

The Park is on Historic England's At Risk Register, which notes the impact of the changes in ownership and subdivision over the last twenty years: *'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. The recent series of planning applications within the RPG, prior to the current one provide a continuing negative trajectory for the significance of the RPG as a whole.

We have fundamental concerns about the current application and its supporting documentation. Some confusion arises from an enlargement of the application site boundary, such that there are two versions of the site boundary interchangeably used throughout the various documents.

Assumptions in the Character Study

This application includes a Character Study which is intended to address heritage matters. However, this long document makes selective use of facts and descriptions and contains erroneous and unproven historic conclusions. For example, reference is made to Shorrock 'Hall' previously occupying the position of Huntsman's Cottages. There is no map evidence of any named Hall or principal building in this location which is more likely that of a hamlet or cluster of agricultural buildings. As a result of discussions with local residents we understand there is evidence that Further Lane was diverted northwards to its present line at a date following Yates Map of 1786, and our review of map evidence suggests that this is a tenable premise. The suggestion of an axial 'avenue' described in the Character Study crossing the application site towards Shorrocks is most likely the former line of Further Lane, relict features of which are indicated on the 1840s OS map. Therefore this route is rather the earlier alignment prior to its diversion as part of the 1790s emparkment. The narrative in the Character Study places much weight on these features in order to support the concept and placing of a new dwelling on the proposed site, however these arguments are questionable and should not to be relied upon.

Impact on the Significance of Woodfold Park

We concur with the preapplication conclusions that harm will arise to the setting of the RPG Woodfold Park, an C18th Palladian mansion in a park in the English Landscape style together with complimentary estate buildings. It is largely unaltered and surrounded by an agricultural landscape beyond its stone boundary wall. The proposed building is adjacent to the northern entrance drive and to Huntsman's Cottages, an estate building in Regency style which accommodated employees. The application dwelling is therefore an intrusive incursion in terms of style, size and use. The application has not satisfied NPPF paragraph 200 that clear and convincing justification is required, if there is any harm to heritage assets. Past and present harm should not be compounded by more harm to the park, its estate buildings and their setting.

The significance of the RPG is not fully covered in the RPG HE listing description which is very brief and does not address the categories Rarity/Aesthetic Value/Historic Value/Group Value. These should be explained and developed in a supporting thorough

heritage assessment. This site has high rarity value, as it is a remarkable survivor in an industrialised area. The conservation of the park and its constituents as a whole is a necessary public benefit, both as a heritage asset and as an educational asset since it demonstrates a period of history in a very graphic way. The English Landscape Park is a recognised art form, valued in the civilised world. Public benefit does not necessarily mean free access to the general public; and can include the conservation of artistic or industrial heritage. There is an interesting collection of industrial heritage in the park's woodlands. The standards of design embodied in the RPG are impeccable, in that the Palladian mansion is complemented by estate buildings which fulfil the role of usefulness with beauty, a Georgian principle, because they are in harmony with the design of the house and are subservient to it in size, mass and distribution. They act as focal points in views to and from the house.

In summary, the immediate setting of the park is completely as intended, that is to say pastoral. Therefore, there is no justification for the introduction at close proximity of the visually significant element which is proposed in the current application.

Green Belt and Countryside Policies

The construction or extension of a large residence on Green Belt is against RVBC's policies. NPPF paragraph 80e is employed to support this application, but this requires a development which 'would significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area'. Whilst the dwelling proposed may have merit in its own right, the current context is problematic.

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 two recent applications for the Deer House and Stud Farm 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 and immediately adjacent applications until a CMP is in place.

If there are any matters arising from this please contact LGT on conservation@lancsgt.org.uk

Yours faithfully

Stephen Robson

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