



Lancashire Gardens Trust
Conservation & Planning Group

28 February 2021

Your ref: 2021/0002/FUL

Development Management
Lancashire County Council
PO Box 100
County Hall
Preston
PR1 0LD

For the attention of Robert Hope

By email only to devcon@lancashire.gov.uk

Dear Sir/Madam

Planning Application No: LCC/2021/0002; Works associated with Areas 1 and 2 of the Preston and South Ribble Flood Risk Management Scheme etc. GT Reference: E20/1525

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.

This application involves works within Area 1C located immediately adjacent to the western entrance to Miller Park, Preston, a Grade II* Registered Park and Garden (RPG), laid out to the design of Edward Milner after 1860. Subject to the following comments and reservations we do not object to the principle of the application and support the Flood Risk Management objectives.

We have reviewed the planning documents submitted for the application and note that there is a comprehensive heritage statement supporting the application. The works within Area 1C comprise concrete flood walls and two flood gates, all located within the enlarged Avenham Conservation Area. The northern floodgate is located within the western spur of the designated area of the RPG as described within the Heritage Statement. We note that Historic England in their response to this application gave the opinion that the impact of the works would be negligible to the significance of Miller Park. Indeed, the relocation of the Council depot boundary to the west will confer

some potential improvement to the visual appearance of the area, despite being located partly beneath the very dominant railway viaduct.

Our concern is that there is an inconsistency in the treatment of the flood walls in the Conservation Area, indicated as concrete on the General Arrangement Drawing of Area 1C. The Landscape Vision Document at Section 2 indicates in the Design Strategy Table that concrete floodwalls are intended for use outside Conservation Areas. This suggests that within the Conservation Areas there should be more sympathetic treatment with more appropriate natural materials. As the new walls will abut stone viaduct abutments a natural stone facing for walls and copings within the conservation area should be used. We recommend this amendment to the proposals.

The western side of the railway embankment is faced with massive rockwork, as mentioned within the listing description. This feature is repeated within Miller Park on the east side of the WCML embankment, where there is a very extensive area of rockwork cliffs, tunnel and grottoes. These features are a contemporary with Milner's work and were probably the work of Pulham and Son of Broxbourne. At the location of the northern floodgate these rockwork features may exist under a curtain of long-established ivy and this needs investigation prior to any construction work commencing. Extreme care will be required to avoid disturbance to any such rockwork in this location during the construction of the northern floodgate.

A further inconsistency arises in the treatment of the area in front of the flood wall, previously within the Council depot. On the General Arrangement this is indicated as topsoil, but on the Environmental Masterplan Sheet 5 is shown as tarmac. A more appropriate design is required which recognises the sensitivity of this area giving access to the Grade II* Miller Park and lying within the Conservation Area.

The Environmental Masterplan Sheet 5 indicates an 'Opportunity to enhance park entrance. Proposals to be agreed with PCC and landowner'. We look forward to this dialogue securing an improvement to this area beneath the viaduct, to be coordinated with the redesign west of the viaduct described above.

We look forward to seeing this project and designs develop taking forward the suggestions and comments made in this response.

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

Yours faithfully

Stephen Robson

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Chair, Conservation & Planning Group