

**Request for Additional Heritage Advice - Reassessment of Land Allocation Sites at
Ullswater Road, Penrith (P94); High Mill, Alston (AL12); and Land Adjacent to
Croglam Park, Kirkby Stephen (KS18)**

South Lakeland District Council

Directorate for People and Places

Memorandum to Eden District Council

To: Kayleigh Lancaster – Planning Officer

From: Graham Darlington – Conservation Officer

Date: 15th March 2016

Thank you for your request for additional heritage advice, dated 18th January 2016, in respect of the Eden Local Plan, following its recent submission for examination. This relates to three specific sites which have been identified by Historic England as unsound due to their potential for adverse effects on the historic environment.

I have considered the comments submitted by Historic England and have revisited all three sites in order to review my earlier advice and provide further information for you, as follows.

Queen Elizabeth Grammar School Annexe (ref P94)

The site's Heritage Asset Significance is derived from its location within the probable historic outer bailey of Penrith Castle. The latter is a Grade I listed building and SAM but the allocation site falls outwith that designated area, but within its broader setting. The external edge of the outer bailey is now not known with certainty but the morphology of the immediate area suggests that it is probably occupied by a continuous row of mid and late semi-detached C20th housing situated on the north and west sides of Castle Drive.

Until 1915 the site sat within the Castle Park public garden, when a small parcel of land was released to provide a new site for the town's Grammar School, which was constructed in 1917. This 'L' shaped structure is the present building on the site and the quality of its architecture and material construction is such that it should be considered as a non-designated heritage asset of local importance, as defined by P135 of the NPPF, due to its architectural, historic and communal values.

The construction of the Grammar School building and its adjacent yard/car park is likely to have disturbed or destroyed archaeological deposits at a high stratigraphical level but it is very possible that deeper deposits lay undisturbed, so that the site retains a high archaeological potential. This has not been evaluated by the site owner and so considerable uncertainty remains over its potential significance. You may wish to consult the Historic Environment Record maintained by the Historic Environment Unit at CCC to see if any published evaluation or excavation has been lodged on the HER, which may throw further light on the site's archaeological significance and sensitivity to development. Without that assessment the potential national significance of the site's.

With regard to the contribution made by the setting of Penrith Castle to its heritage significance my advice is that the spacious, open and formalised Castle Park, which forms a broad arc from the south to the east of the monument, and acts as the immediate and most important aspect of the visual setting to the listed building and SAM. To the north and west the setting is circumscribed by railway and modern road infrastructure, while large footprint retail sheds compromise the wider setting to the south west.

The current school building lies immediately outside this parkland and is separated from it by a tall sandstone wall; some randomly placed, large, mature trees set close to that boundary; and by two further rows of smaller ornamental trees set within the park itself. These features combine to screen the allocation site in outward views from the castle/SAM. In summer only parts of the school's roof are visible from the castle and SAM, while in winter

there are only occasional glimpses of the upper walls and roof through relatively dense vegetation. My advice is that because of the considerable visual filtering provided by the tall wall and these trees, the current building does not detract from or unfavourably affect our experience of the setting of the castle as a heritage asset, in terms of views towards or from its upstanding masonry. For similar reasons the site does not adversely affect the setting of the Penrith Conservation Area, whose boundary is located 50m to the North West.

In terms of the re-development of this site three options are potentially feasible which would result in different levels of impact. The first, to reuse the current building, would generate very little impact, although ancillary structures such as garaging and utilities would still need to be carefully located and designed. Such a reuse would not need to be considered strategically and could be evaluated during normal development management procedures.

The second option would be to introduce a replacement structure on the same footprint as the current school that was of a similar size and scale and incorporated a comparable massing. This would minimise any potential impact on existing, undisturbed archaeological deposits, while such a building would continue to be largely screened in the narrow view arc available out from the castle, so that broadly equivalent impacts on these designated heritage assets would result. Both of the first two options would almost certainly deliver substantially less than the 29 dwellings identified, and this might make these approaches less financially unviable.

The third option, to demolish the current school building and redevelop the site with individual, or clusters of detached structures spread across the whole of site would almost certainly have a much more unfavourable impact on the buried archaeology on the site. In addition, the density of such a development would very likely affect the visual character and grain of the area and therefore detrimentally affect the setting of the conservation area. I would very likely object to the latter option, but could be supportive of the first two approaches.

Land adjacent to Croglam Park, Kirkby Lonsdale (ref KS18)

The significance of Croglam Castle (National Heritage List entry ref number 1004615) relates almost entirely to its function as a defended homestead or small settlement with a 'univallate' earthwork enclosure of the seventh to fifth centuries BC, which was strategically sited at a point where the 'Mallerstang valley' begins to open out into the upper Eden valley. It is an uncommon monument type that is confined mainly to the northern uplands of England, where it evidences a distinct, later prehistoric settlement pattern. Croglam is a relatively well-preserved example and is likely to contain archaeological deposits relating its form of settlement and period of occupation. The monument has a clearly defensible, hill top location, although other examples are found in less prominent topographic positions, and it is perhaps significant that the ditch is internal and placed behind a now slight counterscarp bank, and that there appears to be just a single entrance on the north east side where the external bank increases appreciably in size.

The early core of Kirkby Stephen is located almost 1km to the north east of the allocation site at a fording point on the west bank of the River Eden. It has possible pre-conquest origins as a church town, and a C8th Scandinavian pagan worship 'Loki' stone is preserved inside the current church, which has Norman and C12th fragments but is now predominantly a church of the C13th. The church was probably the focus of the nascent settlement whose morphology is clustered around small, formalised market place, now known as Union Square (earlier The Green), but formerly much larger and more linear, which is preserved in front of the church.

There is no documentary evidence to indicate that burghage rights were granted to the town, but the fragmentary remains of a croft and toft strip field system can be found on the western side of the main street, along with a 'back lane' set behind the house tenements (now Faraday Road); and a 'garths head' at the western end of the croft strips. Interestingly, this back lane continues directly south westwards to Croglam Castle, and so may be earlier than the mediaeval street and tenement layout, which could well date only from the granting of a

market charter in 1352. The Kirkby Stephen title map of 1844 shows that there were few buildings south of Town Head at that date, and most of the buildings on South Road clearly date from the later C19th and early C20ths. The Kirkby Stephen Conservation Area was designated in 1976 and protects the mediaeval and early post mediaeval core of the town, so that its southern boundary is positioned some 300m from the allocation site, and excludes the late Victorian and early C20th settlement on South Road, as well as small, late C20th estates behind the main street.

The allocation site proposes a southwards extension of the linear late C20th settlement set immediately behind South Road. It would be positioned in a slight hollow at the foot of Croglam Castle, well below the defensive enclosure and almost 50m outside of the SAM. My understanding is that such Iron Age settlements rarely preserve evidence of habitation outside of their earthwork enclosures, and, as the entrance to the monument is on the north east side, and its likely access road is well to the north west of the allocation site, archaeological sensitivity might be slight.

However, you should seek authoritative advice from the County Historic Environment Unit on this matter, as they will be better equipped to comment on such archaeological matters.

The allocation site is located almost 300m south of the conservation area and, due to the topography and the screening by houses on, and behind South Road, it would not form a visible part of its setting in views to or from the designated area, and so my advice is that it would not cause any harm to its setting or heritage asset significance. Consequently, from the perspective of the built historic environment, I support the development of this allocation site.

High Mill, Front Street, Penrith (ref AL12)

High Mill is listed Grade II*, a grading which accounts for just 5.5% of the most important listed buildings. Its significance is deftly defined in the comprehensive list description, which dates to the addition of the building to the statutory list in September 2014. In summary its importance is attributable to its age and subsequent historic development as a corn mill; its associations with eminent engineer James Smeaton; almost intact milling machinery; and a well preserved and clearly readable plan and exterior, despite some later additions and minor alterations. Later accretions about the north corner and the north west end are not included within the listing, and nor is the long, linear structure that forms the multiphase 'Factory' Building to the north east, nor the partly mid C19th detached structure to the south.

It also forms a significant building within the Alston Conservation Area where its scale, handsome materiality and physical form has a major prominence to the rear, east side of the Market Place public square. It has a major landmark presence in views from Front Street to the south, and in glimpses through gaps between buildings that edge the Market Place, while its roofscape adds complexity to the skyline in longer views from the west.

I have previously advised that *"the main High Mill block facing Front Street is a very important building. It demands further assessment and research on the survival and potential significance its interior, which could lead to a request for spot listing. I would object in the strongest possible terms if proposals were made to demolish this part of the site to make way for new development"*. The significance of all of the buildings on the site are now better understood following designation, and this safeguarding should guarantee the preservation of the corn mill and prevent any possibility of demolition or other substantial harm occurring. It should also ensure that any redevelopment of buildings around the periphery of the site is handled sensitively in order to protect the compact but visual complex and important setting of the listed structure. Large parts of the 'The Factory' building remain as a detractor from the significance of the conservation area and the replacement of these parts with a building that is contextually sensitive, but which is demonstrably of higher quality should find favor.

However, such matters would be better handled by determination through the normal development management process; and, given the lack of certainty over the type and extent of any redevelopment of the site or parts of it, I do not believe that the principle of the allocation can be achieved, without risking harm to the listed building. I therefore recommend that this site be withdrawn from the allocation.

I hope that this advice is of assistance to you in determining this application.

Graham Darlington
Conservation Advisor