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Your ref: 3/2017/0160 and 0161

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FAO A Dowd

Dear Mr Macholc,

Planning Applications 3/2017//0160 and 0161: Construction of a new access road off the main drive to Stonyhurst College and the creation of a coach parking area; Stonyhurst College, Avenue Road, Hurst Green BB7 9PZ

The above applications are accompanied by a Planning, Heritage, Design and Access Statement (Cassidy and Ashton, Feb 2017) which briefly sets out the proposals and the policy background. It also makes a very brief assessment of the heritage impacts of the scheme. As noted the scheme as now proposed is very similar to that originally proposed (3/2015/0968 and 0969), with the new road branching southeast from the main drive at almost the same point as the existing road to the golf course branches to the northwest. This arrangement is much more sympathetic to the designed landscape than the 'intermediate' proposal for the junction to be staggered by some 30m and answers some of the criticism of that arrangement by the Lancashire Gardens Trust (letter of 31st August 2016), although it does not seem to consider the suggestion that the access to the Old Mill site should be from the east, rather than the west.

A number of earthworks have been identified within Fox Fall Wood which will be crossed by the proposed access road, these can be seen in Figures 7 and 8 of the Oxford Archaeology North survey of the Old Mill site (2017) as well as the application documents. The earthworks to the east end of the route probably represent former bypass channels to the watermills of c.1810 and c.1847. Those to the west end and just inside the wood are of unknown origin. They could perhaps be drainage that pre-dates the 18th century canals, but it seems unlikely that they were associated with the watermills or with supply of water to the putative moated site at 'Back Ponds' to the northeast.

In our response to the original application on 8th September 2016 and the response of 4th March 2016 by LCAS it was recommended that a scheme of archaeological recording should be undertaken, including

"... a programme of investigation and recording of the water control and other archaeological features of the site that may be impacted by the proposed development."

We would repeat that recommendation here, suggesting that an investigation by an archaeological surveyor and a watching brief during initial ground disturbance works would be appropriate. The following planning condition wording is suggested:

Condition: No development shall take place until the applicant, or their agent or successors in title, has secured the implementation of a programme of archaeological recording and analysis. This must be carried out in accordance with a written scheme of investigation, which shall first have been submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure and safeguard the recording and inspection of matters of archaeological/historical importance associated with the site.

Note: The programme of works should include both a topographic survey and watching brief of the water control and other archaeological features within the road corridor that may be impacted by the proposed development. These works should be undertaken by an appropriately qualified professional archaeological contractor to the standards of the Chartered Institute for Archaeologists.

This is in accordance with National Planning Policy Framework paragraph 141: "*Local planning authorities should ... require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible*".

Please note that the above comments have been made without the benefit of a site visit. If you need any further information or would like to discuss this further please do not hesitate to contact me.

Yours sincerely

Peter Iles