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Dear Mr Macholc,

Planning Applications 3/2017/0270: Creation of new vehicular and pedestrian access and area of additional car parking associated with the adjacent Holmes Mill development; 62 Moor Lane Clitheroe BB7 1AJ

The above application is accompanied by a survey of the existing Holmes Mill site (Oxford Archaeology North, April 2014), a Heritage Statement (C J O'Flaherty Dec 2016), a Construction Method Statement (Stanton Andrews Jan 2017), an Existing Site Plan (Stanton Andrews 14/59 Ex 0 Rev C, Dec 2016), and a Proposed Site Plan (Stanton Andrews 14/59 PI01 Rev C, Dec 2016).

The archaeological survey of the Holmes Mill site does not appear to include the area of the proposed development, and is thus only of use when considering the visual impacts of the proposals. The Heritage Statement assesses the existing building at 62 Moor Lane and concludes correctly that the extant structure is of c.1970 date and is of negative value to the extant Conservation Area. It does not, however, consider the buried archaeological resource or the visual impact of the proposed new car park and access on the adjacent Listed Building. The latter is probably not very significant, given the 'improvement' to the setting of the mill (and conservation area) by the removal of the extant building, but the former will need to be considered.

It is also noted that the Plan as Existing appears to be incorrect. Comparison of the photograph supplied as Figure 3 in the Heritage Statement with the Existing Site Plan would suggest that the latter omits to show the eastern part of the stone wall (c.1.5m high) which separates the garage plot from the mill grounds. This portion of wall is also omitted from the plan as proposed. The western part of the wall is clearly extant on early OS mapping, but the eastern part was not present in 1932 (OS 1:2,500 mapping sheet Lancashire 47.14, surveyed 1930) and it may well have been constructed at the time that Salford Bridge Mill (below) was demolished, to straighten the boundary here. It is possible that the wall will need to be treated as a curtilage structure to the Listed mill and require Listed Building Consent for its removal and you should consult the borough Conservation Officer on this matter.

With regard to the impact of the proposals on buried archaeology, it should be noted that the area in front of the existing garage building was formerly occupied by Salford Bridge Mill (Lancashire Historic Environment Record PRN24375). Its location is shown on the 19th and early 20th century mapping reproduced in the Phase 1 Geo-Environmental Site Assessment (E3P, December 2016, Table 3.1) and on the attached map extract. This site was built as a cotton spinning mill and sizing house before 1822, but was converted to a warehouse after 1833 (possibly after 1842, Rothwell M, 1990, *Industrial Heritage: A Guide to the Industrial Archaeology of the Ribble Valley* p.11). The building was later re-used as housing (Langshaw A L, 1953, *How Cotton came to Clitheroe*, p.7) and was demolished at some time between 1935 and 1964 (OS 25 inch mapping, sheet Lancashire 47.14, 3rd and 4th editions). The subdivisions shown on the earlier 20th century maps suggest that these dwellings may have been back-to-back houses. It seems probable that foundations and other buried remains of the mill-cum-terrace buildings will survive on site, although the very southern corner of the structure may have been impacted by the construction of the present building. If the proposals submitted were simply to remove the existing building and provide car parking on its site, then there would be little need for any ground intervention and thus the buried remains would remain in situ.

However the proposals appear to require the cutting away of the ground beneath the building to form a ramp down to the Holmes Mill yard. This detail is rather unclear on the drawings, with no levels being shown on the Proposed Site Plan and no representative section(s) being provided. The only place where a ramp is mentioned in any detail is the Construction Method Statement, where a hatched rectangle is drawn on the plan provided on Page 6 (Stanton Andrews Plan14/59 D1 Rev A, Jan 2017). This area is dimensioned to be 7m wide and slightly longer than the present building footprint. It is annotated: '*Concrete slab, footing and masonry to be removed to allow for a ramped access. 1.7m change in level over 18m...*' giving a *circa* 1 in 10 slope.

No safety fences are shown either side of this ramp on the Proposed Site Plan and the arrangement of parking spaces would not allow for them in any case, so it must be presumed that the whole southwest end of the site is intended to be reduced. The proposed 1 in 10 slope from the Construction Method Statement would appear rather steep for side-on parking as shown and thus it must be presumed that the site level reduction will also extend significantly further northeast. This will threaten the buried remains of the pre-1822 mill.

The applicants should, therefore, be asked to provide:

- (i) A full description and/or plan of the proposed parking area, including levels and sections;
- (ii) An assessment of the impact of the proposals on the buried remains of Salford Bridge Mill;
- (iii) A written scheme of impact mitigation (if required).

You may also wish them to address the matter of the wall between 62 Moor Lane and Holmes Mill Yard mentioned above.

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