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FAO R Major

Dear Mr Macholc,

**Planning Application 3/2018/0036: Conversion of existing barn to one new dwelling with associated alterations to access incorporating retention of unauthorised new window openings and door, and enlargement of original openings. Manor House, Howgill Lane, Rimington BB7 4EF**

Thank you for your consultation on the above application. The application is accompanied by a Planning Statement (PS – JWPC Chartered Town Planners Ltd, January 2018), a Bat Survey (BS – Simply Ecology Ltd, November 2017) as well as building plans 'as existing' and 'as proposed' (Sunderland Peacock Architects, April 2017 ref 5364-01 and 5364-02)

We have two serious concerns with the application as it stands, both of which require further information to be submitted by the applicants before an informed planning decision can be made.

Firstly the description of the proposed works above, taken from the consultation letter, does not match that on the Council's web site nor the wording on the application form. Comparison of the building plans 'as existing' (5364-01) and the photographs of the building contained within the Bat Survey and presumably taken during the reported building inspection of 27<sup>th</sup> March 2017 (BS, p.1) shows a significant number of inconsistencies, not least in the number of doors and windows but also the absence of a dividing wall between the north and south sections of the barn at first floor. It seems likely that the latter is simply a drawing error but the former seem probable to be the 'unauthorised' changes noted above. None of these 'unauthorised' changes are noted on the drawings 'as existing' or 'as proposed' nor is any other evidence provided as to their location, form and extent. As a result it is difficult, if not impossible to come to an informed decision as to their impact on the building.

Secondly the Planning Statement claims that '... there are no known heritage assets within the area surrounding the site' (PS, section 2.4), but no evidence is presented to

support this claim. A rapid examination of the Lancashire Historic Environment Record (LHER) shows that this statement is untrue. In the immediate environs of the site the LHER includes entries for Howgill Mill and its associated millpond, weir, leat, etc. off Robin Lane (LHER 26145), a second Howgill Mill, pond etc. on the south side of Howgill Lane (LHER 26265) and the line of the Roman road running from Ribchester to Elslack and beyond (LHER 15518 and 26266). It should also be noted that whilst there is no specific entry for Manor House, the site is shown on the OS 1:10,560 mapping published in 1853 (sheet Yorkshire 183, surveyed 1849 – see attached), although it is acknowledged that the northern section of the barn appears to be a slightly later addition. The presence of buildings on this epoch of OS mapping has long been held to show that they have some historic interest and as such are worthy of consideration as heritage assets, as defined in the glossary to the National Planning Policy Framework (NPPF):

***'Heritage asset:*** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing) (DCLG 2012, p.52).

This is supported by the statement in The Council for British Archaeology's 'An Archaeological Research Framework for North West England: Volume 2, Research Agenda and Strategy' that:

*'...the bulk of these [farm] buildings are unlisted and represent an important historical research resource... there is an urgent need for all local authorities to ensure that farm buildings undergoing adaption are at least considered for recording.'* so that 'a regional database of farm buildings can be derived and variations across the region examined' (Brennand (ed.) 2007, p.140).

It is notable that the projected line of the known section of Roman road west of the site (shown on the above 1853 mapping) extends directly to Manor House before reaching Howgill Beck, where the lane appears to cross by a ford. To the east of the beck the Roman line is taken up by the line of Howgill Lane on a slightly different alignment, but projecting this west shows that this would need to cross both Crag Clough and Howgill Beck and it appears very probable that the Roman route would have been diverted slightly north, in the same way that the 19<sup>th</sup> century Howgill Lane has been, to utilise a single crossing in the close vicinity of the ford and on the line of the route passing through Manor House. A plan showing the projected road lines and the Manor House site is attached.

As such it would appear that the proposals for the conversion of the existing barn could have implications for the historic farm building and that any groundworks required as part of the development, including the insertion of services, underpinning, new floors and the proposed access alterations, may have archaeological implications for (i) remains associated with the farm, and (ii) remains of Roman date. This does not mean that the proposed works will be found to be unacceptable, but it does require that an appropriate study should be provided as part of the application, as set out in the NPPF section 128:

*'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'* (DCLG 2012, p.30)

We would therefore recommend that the applicants are required to submit further information relating to the form of the barn prior to the unauthorised alterations in 2017 and the location and form of those changes, as well as a formal heritage statement describing the significance of the heritage assets here and assessing the impacts of the proposals upon them. This may require field evaluation to assess any buried remains. Without this information, it would not seem possible to provide consent to the current proposals.

Please note that the advice above has not benefitted from a site visit.

Yours sincerely

*Peter Iles*