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Your ref: 3/2018/0147FUL and 0149/LB

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FAO S Kilmartin

Dear Mr Macholc,

Planning Applications 3/2018/0147/FUL and 0149/LB: Proposed change of use from office (B1) to residential (C3) including minor internal alterations to form separate dwelling, ground floor apartment and duplex apartment. Proposed installation of electronically operated black wrought iron gates to the existing vehicular entrance and the existing boundary opening to the north east site boundary. Stanley House, Lowergate, Clitheroe BB7 1AD

The above applications appear to vary an existing approved scheme for this site, and involve a small amount of external works to the entrance, as well as internal alterations. The applications are accompanied by a Heritage Statement (HS, Sunderland Peacock, December 2017) and there are also comments on the scheme from the Clitheroe Civic Society dated 9th March 2018 available on the planning web page.

As noted by the Civic Society there are some inconsistencies in the Heritage Statement and there is a small amount of groundwork required for the alterations to the entrance. Looking the extent of this external work, however, we are not persuaded that its scale would justify any formal archaeological works.

It is also not clear what works are proposed to the basement and utility room, with regard to the '*water-proofing*', although the installation of a '*sump chamber and evacuation pump*' are required (HS 7.2.1) which is likely to require disturbance to the floor. Given concerns over the quality of '*damp surveys*' and potential impact of '*damp-proofing*' in historic buildings, we would advise that the full details of the damp issues in the basement and utility room and what works are proposed are submitted and that these are closely checked by your Conservation Officer and/or an independent and qualified expert with experience in historic buildings. Dealing with water ingress from failed gutters, flashing, etc. and removing the excessive climbing vegetation to the utility room area should be investigated before any intrusive and/or chemical damp proofing is considered. It is also worth considering if the removal of the cement render from the building (and replacement with lime-based render if required) would be appropriate.

We are also a little concerned that there are no internal photographs within the Heritage Statement either to illustrate the description of the building or to assess the impact of the proposed changes. It is likely, however, that the Conservation Officer will be able to check on and advise if there are issues with, e.g. historic plasterwork or woodwork.

No details are supplied regarding the installation of a new 'ensuite' in the basement (HS 7.6.8), particularly with regard to service runs or other intrusive works.

We would agree, however, that a programme of building recording is a sensible and prudent step (HS note, p.26) and would recommend that, given the reported survival of 17th century elements (HS 6.1), that this should be to Level 3, as set out in "*Understanding Historic Buildings*" (Historic England, 2016). This can be required by condition, the following 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 works. 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. The programme of works should include the creation of a record of the building to Level 3 as set out in '*Understanding Historic Buildings*' (Historic England 2016). It should include a full description of the building inside and out, a drawn plan, elevations and at least one section (which may be derived from checked and corrected architect's drawings), and a full photographic coverage, inside and out. The record should also include a rapid desk-based assessment, putting the building and its features into context. This work shall be carried out by an appropriately qualified and experienced professional historic building survey contractor to the standards and guidance of the Chartered Institute for Archaeologists (CIfA).

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

Note: A list of standards and guidance, as well as potential contractors may be found on the CIfA web site: www.archaeologists.net. A further list of potential contractors may be found on the BAJR web pages: www.bajr.org/WhoseWho/

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*".

Yours sincerely

Peter Iles