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FAO A Dowd

Dear Mr Macholc,

**Planning Applications 3/2018/0956 and 0958: Application and Listed Building Application for retention of unauthorised alterations at first floor to create five guest bedrooms. Three Millstones Inn, Waddington Road, West Bradford BB7 4SX**

Thank you for our consultation on the above applications. They are accompanied by a Heritage Statement (HS) by Ian Rowan, dated May 2018. Whilst we would agree with the statement there that it would be better for these rooms to be refurbished and contribute to the financial security of the business, the assessment is brief and it would have been useful if rather more detail had been provided either there or in other application documentation. For instance it is unclear how the upper floor is currently accessed and where any historic stair would have been (if different), and thus what effect the proposed changes would have on the historic plan form and circulation pattern. Images are provided of the lath and plaster work and of the brick and plaster work, both of which would appear to be later alterations, but other elements impacted or mentioned in the description (e.g. older doors, room at eastern end, fireplace at western end) are not illustrated. There is no information provided on the roof structure and how the new or altered roof-lights for bedrooms 1 and 2 will impact it (the passageway and store roof-lights do not seem to be changing). There is also no information on the new service runs that will be required for the new en-suite provision, and if that will impact the historic fabric.

We would recommend that further detail on the proposals is submitted, which allows a full picture of the impact of the proposed changes to be assessed. If these prove to be acceptable, we are likely to recommend that any works are preceded by a more detailed photographic record of the building, to the standards set out by Historic England in "Understanding Historic Buildings" (2016). Such work can be required by a planning 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 photographic record of the building as set out in '*Understanding Historic Buildings*' (Historic England 2016). It should include a brief description of the building and a full photographic coverage, inside and out, accompanied by a plan or plans indicating the location and orientation of the photography. 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, see [www.archaeologists.net](http://www.archaeologists.net)).

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

**Note:** The booklet '*Understanding Historic Buildings*' (Historic England 2016) is available for download on the web at <https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/>. A list of potential contractors may be found on the CIfA web site: [www.archaeologists.net/RO](http://www.archaeologists.net/RO) or the directory on the BAJR web pages: <http://www.bajr.org/WhoseWho/>

This is in accordance with National Planning Policy Framework paragraph 199: "*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.

Yours sincerely

*Peter Iles*