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Your ref: 3/2019/0999

Our ref: 3_2019_0999-LCC

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Dear Mr Macholc,

Planning Application 3/2019/0999: Outline planning application for the erection of up to 160 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Henthorn Road. All matters reserved except for means of access.
Land off Henthorn Road, Clitheroe BB7 3BY

Thank you for your consultation on the above planning application. The application is accompanied by a Heritage Assessment (HA) by the Pegasus Group, dated October 2019. This Assessment includes extracts from relevant legislation, policy and guidance, an extract from the Lancashire Historic Environment Record and further information from a limited range of other sources. It concludes that potential impacts on the archaeological resource are considered to be low and that impacts on designated heritage assets are limited to a minor change in the setting of the listed Siddows Farmhouse, which has negligible significance.

Whilst we have a significant number of technical issues with the HA as submitted, we would conclude that the likely impact on designated and known non-designated heritage assets are low to negligible, and the potential for as-yet unknown buried archaeological remains of high significance to be present is low. This does not mean that no archaeological investigation and mitigation is required, but does indicate that such work can be required by planning condition rather than requiring pre-consent evaluation works and that any remains are unlikely to inhibit potential development.

In particular we would wish to highlight that the HA mentions the ALSF studies of the Lower Ribble Valley (section 5.4) but concludes that "*No particular archaeological interest was identified within the site during these works*". This is a misinterpretation of the results of the study and in fact the ALSF study assigns the proposed development site high potential for remains of the prehistoric and medieval periods to be present and medium potential for encountering remains of Romano-British date. As a result of that assessment of potential three adjacent development sites have been investigated archaeologically (HA Appendix 1: ELA2415, ELA2585 and ELA2692; a further site has

been subject to geophysical survey more recently and associated trial excavation is pending) but results have been limited as noted in the HA. Trial trenching event ELA2692 was undertaken following, rather than prior to, soil stripping by the developers and thus its negative results may be somewhat unreliable. The other trenching event ELA2415 revealed a prehistoric axe and evidence for medieval to post-medieval agriculture. This field work would seem to at least partly bear out the ALSF assessment of potential, but the remains recovered are only considered to be of low significance.

As such we would recommend that, in common with the consents applied to adjacent proposed development sites, a planning condition is attached to any consent granted to this application requiring a phased scheme of archaeological works to be undertaken here. It is recommended that the first phase of that work include a revision of the present HA and a scheme of field investigation (to include trial excavation) and the formulation of a report to be submitted with any reserved matters application, at which point a decision on the need or otherwise for further investigation and/or mitigation works can be considered. The following wording is suggested, based on that applied in the appeal decision APP/T2350/W/19/3221189 (19 June 2019) to the adjacent site:

Condition: No development shall take place until a Written Scheme of Archaeological Investigation has been submitted to and approved in writing by the local planning authority. The scheme shall include:

- a) An assessment of the potential of the site to contain archaeological remains or features of interest.
- b) The programme and methodology of site investigation and recording which shall include an initial phase of both geophysical survey and trial trenching to establish the presence or absence of buried archaeological remains and their nature, date, extent and significance.
- c) The programme and methodology for the post investigation analysis and assessment of the site investigation results including the further excavation or investigation of any remains identified in item (b) or other measures to record and retain their significance in-situ.
- d) The provisions to be made for the production of an appropriate final report and its deposition and dissemination.
- e) The provisions to be made for the deposition of the full site archive.

A report on items (a) and (b) shall be submitted as part of a reserved matters application. Items (c) (d) and (e) should be completed prior to the first occupation of the development unless otherwise agreed in writing with the local planning authority. All archaeological works shall be undertaken by an appropriately qualified and experienced professional contractor to the standards and guidance of the Chartered Institute for Archaeologists (CIfA). The development shall be carried out in accordance with the approved Written Scheme of Archaeological Investigation.

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

Note: Relevant archaeological standards and a list of registered contractors can be found on the CIfA web pages: <http://www.archaeologists.net>. Contact details

for other non-registered contractors can be found on the BAJR web site:
<http://www.bajr.org>.

Note that if the development is to be formally phased you may wish to alter the deadline for the completion of items (c) - (e) above.

This is in accordance with National Planning Policy Framework (MoHCLG 2019) 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."*

Yours sincerely

Peter Iles

Planning Officer (Archaeology)
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