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Your ref: 3/2021/0311

Our ref: 3 2021 0311-LCC.DM

Date: 28th April 2021

F.A.O Adam Birkett

Dear Mr Macholc,

Planning Application: 3/2021/0311

Proposal to demolish and convert a number of agricultural buildings at Brockhall Farm, into 8 residential properties; construct a number of garages for the use of the residents; and redevelop the surrounding landscaping to incorporate parking, landscaping and amenity spaces for each property. Resubmission of 3/2020/0180. Brockhall Farm, Brockhall Village, Old Langho

The current application is accompanied by Oxford Archaeology North's 2021 Archaeological Desk-Based Assessment and Historic Building Survey.

The Historic Environment Team does have a few comments to make on the Assessment and Survey:

- 1. The pre-WWII, probably 1920s, silage tower mentioned in A.3.6.16 & A.4.4.4, is described, in a quite matter-of-fact manner, as being an early and rare example, but then fails to go on to discuss whether such a structure might, as a consequence of its rarity, merit retention or more detailed recording than that undertaken within the existing survey. We feel that further information concerning the potential significance of the silo is required before a decision can be reached on its proposed demolition as part of the current scheme, and this section therefore needs to include such a discussion,
- 2. The source for Plates 3, 4 & 5 needs to be clearly stated. These maps can be viewed on <u>Lancashire County Council</u>: <u>Environment Directorate</u>: <u>Old Maps</u>, which has been included as a source in the Bibliography. Such use of material from the Lancashire County Council Old Maps web-page is not permitted. There is a quite clear statement to this affect in the section "Notes" on the web-page, which includes the following:

"There is no objection to using these maps for personal research but they cannot be reproduced elsewhere including within planning applications or their supporting documentation",

- 3. The ClfA Code of Conduct was revised in 2019, and the Standard and Guidance for Desk Based Assessments was updated in 2017 & 2020, whilst that for recording Historic Buildings is not mentioned at all,
- 4. There is no mention (or use) of the recently updated North West Regional Research Framework, in particular initiatives 7.13 & 7.15 in the 2007 version, and I16 and 125 of the revised, as yet to be published, 2021? version,
- 5. Understanding Historic Buildings: A Guide to Good Recording Practice (Historic England, 2016) on which the Survey is based is absent from the bibliography.

We would therefore advise that the Borough Council request that a revised version of the report, addressing the issues raised above, be resubmitted prior to determination of the current planning application.

Yours sincerely

Doug Moir

Planning Officer (Archaeology) Historic Environment Team