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Your ref: 3/2022/0317

Our ref: 3_2022_0317_LCC

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FAO S Kilmartin

Dear Mr Machole

Planning Application 3/2022/0317: Reserved Matters application in respect of Phase 5 and 6 to include access, appearance, landscaping, layout and scale with respect to 300 dwellings following outline approval 3/2015/0895. Land at Higher Standen Farm and Part Littlemoor Farm, Clitheroe

Thank you for your consultation on the above planning application. The heritage statement accompanying the application (Lanpro, March 2022) states that it does not consider buried archaeology (section 1.5).

As you will be aware the development site is crossed by the line of a Roman road and previous archaeological investigations identified and recorded the remains of a prehistoric cemetery within the Phase 1 section of the development (Archaeological Research Services Ltd, 2019, *An Archaeological Excavation of a Bronze Age ring ditch at Higher Standen Farm, Clitheroe, Lancashire*). Also within the Phase 1 area was a field barn forming part of Higher Standen Farm, this was also recorded prior to development commencing (Archaeological Research Services Ltd, 2017, *Higher Standen Farm, Clitheroe, Lancashire: Historic Building Survey*). It should be noted that two geophysical surveys were undertaken on the wider development site, but that whilst they revealed a potential ring ditch (later found to define the cemetery mentioned above), the burials themselves were not identified, indicating that whilst such survey can reveal some buried remains, not all show up.

As part of the evaluation of the proposed spine road, three trial trenches and a larger area were excavated in the present development area (Archaeological Research Services Ltd, 2020, *Archaeological Works at Higher Standen Farm, Phases 2-3 and Spine Road, Clitheroe, Lancashire*). The larger excavation area was intended to investigate the projected line of the Roman road but found that, other than an increased concentration of stones, no structural remains of the road were encountered. A pre-19th century ditch and a 19th century culvert containing a field drainage pipe were however detected. Of the three smaller trenches one revealed traces of what was initially thought to be the remains of a curved ditch (also suggested as a ring ditch in the geophysical survey) but following further investigation was considered to be a natural feature. The

second trench revealed a land drain and two patches of clay identified as natural features; the third trench revealed no buried features.

The number and size of trenches that has been excavated within the presently proposed development area is, however, rather small and it would not appear to be appropriate to rely on these as a reliable indication of the archaeological potential of the whole development area. We would, therefore, recommend that further investigations are undertaken, initially comprising a programme of further trial trenching followed by further investigation of any buried features identified. These works can be required by condition, as used in outline approval 3/2015/0895.

In addition to the above, the development includes the site of an agricultural building, dated 1837 but with later extensions, known as the 'Old Bothy' (Heritage Statement sections 7.20-7.25, photos 4-7). It is proposed to partially demolish this building, leaving some walls standing as part of the children's play area. There is no justification in the heritage statement for the demolition of the building, although it is suggested that the impact of the demolition would be mitigated by a programme of building recording (Heritage Statement sections 8.13-8.15). There would appear to be an opportunity for the building to be retained and converted to residential use within the overall development, thus retaining a significant aspect of the area's heritage, but we cannot insist on this. If the council find the demolition proposals acceptable, we would recommend that they require a formal record of the building to be created to level 3 as set out in '*Understanding Historic Buildings*' (Historic England 2016). This work can also be required by condition. The following wording for the conditions is suggested:

Archaeological Investigation and Recording:

Condition: No development, site clearance/preparation, or demolition shall commence until the applicant or their agent or successors in title has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, which shall be submitted to, and approved in writing by, the local planning authority. The programme of works shall include an initial phase of trial trenching, as well as the compilation of a report on the work undertaken and the results obtained. These works should aim to establish the presence or absence of buried archaeological remains and their nature, date, extent and significance. If remains are encountered then a subsequent phase of impact mitigation (which may include preservation in situ by the appropriate design or siting of new roads, structures and buildings, formal excavation of remains or other actions) and a phase of appropriate analysis, reporting and publication shall be developed and a further written scheme of investigation submitted to and agreed with the local planning authority before development commences. All archaeological works shall be undertaken by an appropriately qualified and experienced professional archaeological contractor and comply with the standards and guidance set out by the Chartered Institute for Archaeologists (CIfA). The development shall be carried out in accordance with the agreed details.

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 ClfA 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>.

Building Recording:

Condition: No works to the building known as 'Old Bothy', including any clearance/demolition or preparation works shall take place until the applicant, or their agent or successors in title, has secured the implementation of a programme of archaeological building recording to level 3 as set out in "*Understanding Historic Buildings*" (Historic England 2016). This must be carried out by an appropriately qualified and experienced professional contractor to the standards set out by the Chartered Institute for Archaeologists and in accordance with a written scheme of investigation, which shall first have been submitted to and agreed in writing by the Local Planning Authority.

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

Note: Relevant archaeological standards and a list of registered contractors can be found on the ClfA 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>. "*Understanding Historic Buildings*" can be accessed online at <https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/>.

This is in accordance with National Planning Policy Framework (MoHCLG 2021) paragraph 205: "*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 [Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository]*".

Please note that the above comments have been made without the benefit of a site visit.

Yours sincerely


Planning Officer (Archaeology)
Historic Environment Team