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Your ref: 3/2025/0057  
Our ref: 3\_2025\_0057-LCC  
Date: 28<sup>th</sup> February 2025

**FAO B Taylor**

Dear Ms Hopkins,

**Application 3/2025/0057: Listed Building Consent for installation of underfloor heating at ground floor.  
Waddington Hall, Clitheroe Road, Waddington BB7 3HP**

Thank you for your consultation on the above application. The overall principal of underfloor heating in historic buildings has been discussed in many places, and whilst there is potential for impacts on existing historic fabric and archaeological remains there are also advantages, not least the removal of obtrusive modern radiators. We are content to leave the assessment of impacts on the existing floors and doorways, skirtings, staircase, fireplaces, etc., and the specification of how such impacts shall be addressed to the expertise of your Conservation Team.

Regarding the potential impacts on buried archaeology, the excavation of the existing floors to insert the required insulation, heating system and new finishes can require significant excavation. This has the potential to reveal or remove both historic floor surfaces and supports, as well as evidence of previous alterations and changes in the form of wall footings and remains of previously demolished walls or other features, as well as construction and demolition deposits. To check on this issue a series of trial holes have been excavated across the building as detailed in the application documentation, and these appear to show that existing floor surfaces are of fairly modern date and probably relate to the c.1900 works detailed in the Heritage Statement (Sunderland Peacock, 2025) or to subsequent alterations, adaptations, and refurbishments.

The proposed new heating systems have been designed using the evidence from the trial holes and there should be limited or no archaeological impact if the designs can be implemented as drawn. The following points will, however, need consideration.

Given the limited number and depth of the trial holes, the possibility of some earlier remains (such as lines of walling, former fireplace bases, plinths and joist-holes) being extant exists in areas away from the trial holes. These may have been incorporated into the body of later make-up levels and concrete or protrude through these layers

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but have been cut down to suitable levels to allow the installation of the present flooring. The significance of any such remains will depend upon their date, function, and survival, but some form of monitoring and rapid recording is considered to be appropriate, particularly if those remains will need to be reduced or removed to accommodate the new works.

There may be practical difficulties in the implementation of the drawn proposals in some instances, particularly where it is proposed to remove the upper portion of a concrete sub-floor and retain the lower portion. In my (limited) experience normal concrete breaking tools are likely to fracture the extant concrete slab vertically to its full depth rather than at the desired horizontal level, leading to a loss of integrity of the desired lower concrete layer or its complete removal. Where there is an extant blinding or bedding layer, such as appears to be present in The Monks Room (drawing 6423-PRD1), the installation of a new concrete layer on top of the extant blinding or bedding should not cause any archaeological problems. Where there is no such bedding layer, as appears to be the case in The Morning Room (drawing 6423-PRD2), there is a risk of accidental penetration into earlier soils or deposits. In either case, dependent upon the proposed floor loadings (and Building Regulations, etc. – a minimum of 100mm thick seems to be commonly quoted on the Internet), there could be a requirement to excavate into that material to provide a sufficient formation depth for a new slab to accommodate anticipated floor loadings. Whilst the deposits which would be disturbed by this may also date to the same period as the installation of the concrete, this cannot be relied upon. A programme of archaeological monitoring and recording would therefore be required.

This potential requirement for a greater depth of concrete below the new underfloor heating than shown on the drawings (which varies between 50mm and 100mm), or the potential for that 'retained' level of concrete to be cracked and thus requiring to be replaced, is a detail that needs to be checked by an appropriately qualified engineer prior to any consent being given.

Once that detail has been checked and the drawings 'as proposed' approved, we would recommend that should consent be granted to the application, that a planning condition be applied requiring a scheme of archaeological monitoring and recording to be designed and implemented as part of the works, with an appropriate contingency plan in place in case of the discovery of unexpectedly significant or complex remains. The following wording is suggested:

**Condition:** No excavation or ground disturbance works on the application site, including any required for clearance/demolition, site preparation, services, etc. shall take place until the applicant, or their agent or successors in title, has secured the implementation of a programme of archaeological monitoring and recording works, to the standards and guidance set out by the Chartered Institute for Archaeologists as an integral part of the groundworks required for the development. These works must be carried out by an appropriately qualified and experienced professional contractor 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 and shall include a contingency plan for the unexpected discovery of complex, extensive or particularly significant remains. The works shall result in the compilation of a



formal report on the works undertaken and the results obtained and include the deposition of a copy of the report with the Historic Environment Record. The development shall be carried out in accordance with the agreed details.

**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 lists of potential contractors can be found on the ClfA web pages: <http://www.archaeologists.net> and the BAJR Directory: <http://www.bajr.org/whoseWho/>.

The council may wish to consider including a condition requiring a time limit (such as prior to any re-occupation) for the provision of the report on the recording works.

This is in accordance with National Planning Policy (MoHCLG 2024) paragraph 218: *"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

*Peter Iles*

Peter Iles  
Planning Officer (Archaeology),  
Historic Environment Team

