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Your ref: 3/2026/0356
Our ref: 3_2026_0356-LCC
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FAO L Hayes

Dear Ms Hopkins,

**Application 3/2026/0356: Erection of 77 no dwellings and creation of community parkland, with vehicular access from Whalley Road and associated infrastructure, parking and landscaping.
Land at Hammond Ground, Whalley Road, Read BB12 7RP**

Thank you for your consultation on the above application. The documentation includes an Archaeological Desk-Based Assessment (DBA, Tetra Tech RPS, Nov 2025), a Built Heritage Statement (BHS, Tetra Tech RPS Mar 2026), and a Geophysical Survey (GS, Magnitude Surveys Mar 2026).

We are happy to defer any consideration of the impact of the proposals on the settings of designated sites (including Read Hall) as set out in the BHS, to your conservation advisors.

With regard to non-designated heritage assets, we are concerned that the DBA assumes that a lack of information on pre-medieval archaeology in the immediate area of Hammond Ground equates to a low or negligible potential for its existence (DBA sections 4.15-4.21). It is acknowledged that previous archaeological investigation in the area is limited (DBA section 4.12-4.14), but it should have been stressed that in the absence of intrusive fieldwork (e.g. that at Portfield, DBA Section 4.19) information on pre-medieval activity relies heavily on the reporting of chance finds and is thus rather unreliable and dependent upon land uses. It would also be valid to state that the presence of a substantial and long-lived site such as that at Portfield would tend to suggest the presence of a significant settled population across the wider landscape during these periods. Where suitable sites, such as Hammond Ground, exist it would be reasonable to expect them to have been farmed from the Neolithic period onwards and that where later disturbance has been limited (e.g. by pastoral or parkland land uses), that evidence for this occupation will still exist.

Regarding the lack of evidence for Anglo-Saxon activity, the presence of a significant pre-Conquest settlement centre nearby at Whalley should be pointed out. The town was sufficiently important for a church to have been established there by the 8th

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century, and it was the centre of one of the oldest parishes in the county (and one of the largest until well into the post medieval period). At this time Whalley may have been as important as Clitheroe or the centre of the ancient Hundred at Blackburn. The DBA notes that Read is named in the 13th century (section 4.22) but omits to mention that the name derives from an Old English (i.e. pre-Conquest) source (Ekwall 1922 *'The Place-Names of Lancashire'* p.79). The same source also indicates many other Old English and Scandinavian-derived names in the area. The absence of recorded physical remains of this period is not unusual across the county and cannot be taken to indicate a lack of activity. It is more probable that many sites of this date have continued in occupation and evidence of their early origin has either not been recognised or has been lost under medieval and later redevelopment.

The DBA notes the presence of the 14th century Read Hall estate, and the possible deer park there, but suggests that Hammond Ground was cultivated during the medieval period (section 4.25). Whilst this may have been the case, little evidence is provided to support this, beyond an assumption that some or all of the remnant ridge and furrow earthworks and associated field boundaries seen on aerial photography and LiDAR (DBA Fig. 5) are of medieval origin. In fact, none of the ridge and furrow within Hammond Ground demonstrates the classic 'reversed-S' layout of medieval ploughing (see e.g. <https://historicengland.org.uk/images-books/publications/iha-field-systems/>) and a great deal is very straight and much more likely to be of later post-medieval date. Indeed, if it were not apparently overlain by the pre-1893 coal mining, it would be tempting to suggest that the extensive and straight ridge and furrow to the southwest of the former watercourse that crosses Hammond Ground diagonally (DBA Fig. 5) was of WWI or WWII date.

The DBA has successfully identified the two 'old coal pits' and the sandstone quarry noted in the Lancashire Historic Environment Record (LHER), but has not included details of the other four mine entries noted by the Mine Remediation Authority (DBA 3.12; PWA Planning, 2026, Letter: Mine Entry Investigation at Whalley Road, 24 Apr 2026), including that subsequently identified by the Geophysical Survey to the west side of Hammond Ground (GS 7.3.1.11, Figs 4 and 7). The comment in section 7.2.4 of the GS relating the possible coal adit site to an area of sandstone quarrying however seems to mistake the annotation of the nearby quarry for actually quarrying (GS 7.2.4; DBA 4.33, Fig. 9). The two coal pits identified in the DBA are described as 'small scale shaft pits' (DBA 4.42) which seems likely, as the Mine Remediation Authority also record probable shallow workings and coal outcropping across Hammond Ground (<https://datamine-cauk.hub.arcgis.com/> and https://mine-plans.bgs.ac.uk/mra_search.html?mra_catalogue_number=NW498). The 'old coal pit' noted towards the northeast corner of Hammond Ground may be that identified on the plans available on the second web site as 'Heaps Field Shaft', which is also annotated "Approx 40yds deep to coal". This is considerably deeper than an old-fashioned 'Bell Pit' implied by DBA section 4.42, although the surface earthworks may have suggested working of this type. The coal mining may have been to provide for local or estate use or be a symptom of the financial instability suggested by the 1896 and 1924 sales (DBA 4.34-4.35, Figs 11 and 12).

It is also noticeable that the lines of the water pipes identified on the sale plans do not align with the service pipe routes detected by the Geophysical Survey (GS Figs 3 and 4). This is probably the result of poor record-keeping but could also indicate new or



replacement pipework. The features noted in the northwest corner of the geophysical survey area do appear to have archaeological potential, although they could also relate to the landscaping of the park or natural processes. Remains of former field boundaries and other agricultural features probably pre-dating 1893 are seen on the GS and the LiDAR, as well as hinted at on the 19th century OS mapping, but there are also sufficient traces of other 'undetermined' features across the rest of the survey area to suggest that buried remains of earlier occupation will survive across the site. We would agree that the main threat to such remains is the proposed residential development on the east side of the site, but landscaping and other works (temporary or permanent) required elsewhere may also threaten them. Whilst they may be of early date (above), there does not seem to be sufficient reason to assume that they would be of sufficient importance to require preservation in situ at the expense of development. As such we would recommend that, should planning consent be granted for this or another development here, that a condition requiring a phased scheme of archaeological investigation is designed and undertaken prior to any ground disturbance occurring, is attached. The following wording is suggested:

Condition: No groundworks or other excavation, including preparatory works, stripping for site compounds, etc. or the installation of drainage or other services shall take place until the applicant, or their agent or successors in title, has secured the implementation of a phased programme of archaeological investigation, recording, and analysis. 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. 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 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>.

The programme of works should include an initial phase of field investigation. This work should result in the production of a report which sets out the work undertaken, the results of that work and the requirement for any further phases of work. Such further phases of work may include (but not be limited to) topographical survey, further excavation and recording, archaeological supervision of ground works, post-excavation analysis and reporting, publication of a report and the deposition of the archaeological archive.

The council may also wish to consider including a condition requiring a time limit, such as prior to first occupation, for the provision of initial reports on the works, up to and including the provision of a post-excavation assessment report (the first phase of any mitigation excavation reporting). We would, however, note that the specialist



analysis required for a final excavation report and any publication can take significant time and it may not be practicable for such a time limit to apply to these items. It would be appropriate, however, for such a 'reporting condition' to require an appropriate timetable to produce and publish/deposit any final reports, archive, and any publication to be agreed in writing with the council.

This is in accordance with National Planning Policy Framework (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

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