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Your ref: 3/2018/0361

Date: 15th May 2018

FAO S Kilmartin

Dear Mr Macholc,

Planning Application 3/2018/0361:

**Full application for the demolition of existing structures and removal of culvert to Sabden Brook; development of 30 dwellings including re-construction of former Marbil office buildings as new dwellings; reconstruction of base of mill chimney as an ecology tower and associated access and landscaping.
Former Victoria Mill, Watt Street, Sabden BB7 9ED**

The above application is accompanied by a Built Heritage Statement (BHS: M B Heritage, April 2018), some surveys of the existing buildings and site and a report on the chimney. The latter, by Warburton Steeplejacks and dated July 2017, recommends immediate demolition works to the (then) 35m high chimney. This work was carried out shortly after, along with demolition of adjacent structures and only a stump of the chimney still stands. This stump is also said to be unstable in the Structural Report (Paul Waite Associates, August 2017) and its complete demolition is recommended, along with the demolition of the historic spinning mill and office building.

Whilst not noted in the application a small archaeological investigation has been undertaken (April 2018) near the base of the chimney, examining the possible survival of buried remains of the later 19th century engine and boiler houses, and a report is currently pending. A project design for a scheme of archaeological building recording on the site has also been developed, although we are not aware if that work has commenced.

In general the BHS seems to have been appropriately undertaken and provides a useful description and insights to the layout and development of the site. The assessment of significance set out in section 3.33 is reasonable and the conclusions reached in section 4.7 and 4.8 are acceptable. We would agree with the recommendation made that a building recording exercise be undertaken prior to further demolition taking place and

would recommend that the existing project design for this be submitted to the Council for approval and implementation – this may be required by a planning condition.

With regard to buried archaeological remains, the interim results of the trial trenching noted above would suggest that buried remains survive in the vicinity of the extant chimney. It is not possible (with the information we have to hand) to further identify the full significance of those buried remains, but it would appear probable that a scheme of further recording may be justified. Such recording may involve further limited excavation and/or a formal watching brief during construction or demolition, but its extent would be limited to a small proportion of the development area and can be required by planning condition.

The only comments we would make with regard to the design of the proposed new development are in regard to the reconstructed chimney stump or 'ecology tower'. We welcome the fact that the developers are proposing to include this 'industrial' feature, but do note that the new tower seems to be lower in height than the surrounding buildings. It is thus not the landmark and townscape feature that the original chimney was. It would be preferable for it to be visible above the roofs of the new buildings, but we are aware that increasing its height would increase both the cost of construction and the ongoing maintenance costs and will leave this as a suggestion rather than a recommendation. There is also an opportunity to add an information board or boards to the base of the new tower, giving a summary of the history of the site as well as information about the bats and birds it is hoped to attract.

The following planning condition wording, for the investigative and recording works, is suggested:

Condition: No development shall take place until the applicant, or their agent or successors in title, has secured the implementation of a programme of archaeological investigation and recording works. 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. These 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 these agreed details.

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

Note: Relevant archaeological standards and lists of potential contractors can be found on the CIfA web pages: <http://www.archaeologists.net> and the BAJR Directory: <http://www.bajr.org/whoseWho/>.

This is in accordance with National Planning Policy Framework paragraph 141: "*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."

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

Yours sincerely

Peter Iles