Dear Mr Macholc,

Planning Application 3/2018/0830: Alteration of existing roof, erection of new single storey extension to rear, alterations to external openings, erection of new single storey garage. 9 Greenside, Ribchester PR3 3ZJ

The above application is for works to a building within the Ribchester conservation area and to land which is partially within the Scheduled Monument of Ribchester Roman Fort. Whilst confused in places and needing some copy-editing, the Heritage Statement (HS - Sunderland Peacock 2018) which accompanies the application has some useful information. It suggests that the present house could be an amalgamation of two earlier 19th century cottages, potentially with ground floor loom shops for hand-loom weaving – this seems possible, but evidence for this is not conclusive. The HS also notes that the house has been significantly altered by the construction of a two-storey extension across the whole of the rear elevation, replacing an earlier rear element seen on OS 1847 and 1893 mapping. A little more information would have been useful as part of this exercise, such as an assessment of the date and originality of the staircase which is to be removed.

Section 8 of the HS contains comments on pre-application consultations held with Historic England, which emphasise the need for Scheduled Monument Consent for the works within the Scheduled area, but do not object to the proposed works there "...if the garage / playroom can be supported on a slab which disturbs the ground to a maximum depth of 300mm..." in accordance with a draft design statement. This 'design statement' does not seem to accompany the application. It is also notable that SPA drawing 5693-P02 includes a '400mm archaeology line' as part of its proposed garage foundation detail with no explanation as to its meaning or source, or why it deviates from the Historic England 300mm figure quoted above.

Section 9 of the HS provides an assessment of the heritage impact of the proposals in the form of a table. We would make the following comments on this:
• Alteration of existing rear flat roof to form double apex roof – low beneficial impact. No mitigation required.
• Erection of proposed single storey rear extension to provide dining room, utility and WC – neutral impact on building (attached to extant modern extension); adverse impact on buried archaeology (level of impact dependant on depth of disturbance and sensitivity of archaeology). Mitigation required.
• Widening of existing first floor windows to the front elevation – low adverse impact on significance of building. Mitigation required.
• Alteration of existing ground floor window opening to the front elevation to form new front entrance door – low adverse impact on significance of building. Mitigation required.
• Close up existing door opening to the side elevation – neutral impact (works to modern extension). No mitigation required.
• Grubbing up of existing concrete hardstanding and erection of new detached play room and garage building – neutral impact on existing building (timber frame/clad building is not a typical structure for the area but is unlikely to adversely affect the setting); adverse impact on buried archaeology (level of impact dependant on depth of disturbance and sensitivity of archaeology). Mitigation required.
• Alteration to entrance wall to increase visibility and security – adverse impact on buried archaeology (level of impact dependant on depth of disturbance and sensitivity of archaeology). Mitigation required.
• Replacement of existing timber casement windows with timber sliding sash windows – low beneficial impact. No mitigation required.
• Repositioning of existing stone retaining wall to provide path along the north side of the house leading to the rear – adverse impact on buried archaeology (level of impact dependant on depth of disturbance and sensitivity of archaeology). Mitigation required.

We would add to this table the following works, noted on the drawings but not included in the HS:

• Installation of services to proposed new play room and garage – potentially adverse impact on buried archaeology (level of impact dependant on depth of disturbance and sensitivity of archaeology). Mitigation may be required.
• Removal of existing stair and replacement by new stair in alternate position (SPA drawing 5693-P01) – potentially adverse impact on building, depending on originality of extant stair and floor/ceiling in new location. Mitigation may be required.
• Additional landscaping in Scheduled Area (SPA drawing 5693-P02) – neutral impact on building; potentially adverse impact on buried archaeology (level of impact dependant on depth of disturbance and sensitivity of archaeology). Mitigation may be required.
• New gravel driveway/parking/paths, cobble area/lines and gates/gateposts at east and west ends of new drive (SPA drawing 5693-P02) – neutral impact on building; adverse impact on buried archaeology (level of impact dependant on depth of disturbance and sensitivity of archaeology). Mitigation may be required.
As will be noted from the above it is not possible to determine the actual level of impact on the buried archaeology, as the depth of disturbance required and the presence, depth and sensitivity of any archaeological remains is unknown, and the full details of foundations, services, etc. required have not been provided. The HS table does include the proposed mitigation "Trial pits / excavations to be carried out on proposal site prior to works commencing to determine potential for non-scheduled archaeological remains" for both the new extension and the new playroom/garage, as well as provision for an archaeological watching brief during excavation works and a "Suitable foundation design to prevent significant harm to any non-scheduled archaeological remains". With the proviso that the quotes above should include scheduled as well as non-scheduled remains and that formal Scheduled Monument Consent is required, this approach seems sensible although we would strongly recommend that the 'trial pits / excavations' are undertaken by archaeologists to the requirements of the foundation engineers, as this is likely to be more successful than archaeologists watching engineering trial holes.

With regard to the building, as there is also some impact from the works on the front wall mitigation of that impact will also be necessary. Rather than delay the application for an assessment of the date and significance of the stairway, this can be dealt with at the same time. We would therefore recommend a formal photographic record of (i) the front of the building where works to the doors and windows are proposed; and (ii) the present staircase and the floor/ceiling/walls where the new staircase is to be installed.

Whilst it would be preferable for the trial works and foundation design to be undertaken prior to any planning approval being given, with suitable wording all the above works can be required by planning conditions. The following condition wording is therefore suggested:

**Condition:** No development, clearance/demolition or site preparation works shall take place on the site until the applicant, or their agent or successors in title, has secured the implementation of a programme of archaeological works 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 comprise the following elements:

(i) The excavation of archaeological trial holes on the site of the foundations required for the proposed extension and the proposed playroom / garage building, sufficient to establish the presence or absence of archaeological remains, their depth and general character, and for the design of foundations which would avoid significant harm to any archaeological remains.

(ii) The undertaking of a formal archaeological watching brief during any excavations required for the proposed development. This shall include the lifting of any extant concrete ground slabs, foundations and redundant services, the construction of all new foundations, slabs and service connections, the formation of new walls and drive / parking / path surfaces, and any landscaping works required. A contingency plan should be in place as part of this work, to deal with any unexpected or particularly complex remains encountered.

(iii) The provision of a photographic record of the extant front wall to the house and the extant staircase, as well as the areas to be impacted by the
proposed new staircase, as set out in "Understanding Historic Buildings" (Historic England 2016).

(iv) The compilation and submission of a formal report on the work undertaken, the results obtained and any conclusions drawn from them. The above works must be carried out by an appropriately qualified and experienced professional archaeological contractor to the standards and guidance set out by the Chartered Institute for Archaeologists. 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:** The standards and guidance of the Chartered Institute for Archaeologists and their 'Registered Organisations' lists of potential contractors can be found on their web site at [www.archaeologists.net](http://www.archaeologists.net). Contact details for other non-registered contractors can be found on the BAJR web site: [http://www.bajr.org](http://www.bajr.org). Historic England 2016 "Understanding Historic Buildings" is available on the Historic England web pages at [https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/](https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/)

You may well wish to add a condition requiring the submission and approval of detailed foundation designs, as discussed above.

A note reminding the applicant that formal Scheduled Monument Consent from Historic England will be required for any works within the scheduled area may also be appropriate.

This is in accordance with National Planning Policy Framework (MoHCLG 2018) paragraph 199: "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".

Yours sincerely

*Peter Iles*