



Your Ref: SMD/2014/0682
Our Ref: JS/CP/1250

17 August 2015

Jane Curley
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
ST13 6HQ

Dear Jane

Further to correspondence from Mr. David Walters, this letter provides a response to the points raised in relation to the now demolished Whiston Eaves Farm stables, the site of which now lies within the Moneystone Quarry boundary. Paragraph numbers referred to in the first part of this letter refer to Mr Walter's email of 11th January 2015 and to Mr Walters' letter of 19 May 2015 in the second part. Contributions to this letter have been provided by Gary Stringer of Sibelco, the former landowner and quarry operator, and Dr Mark Adams of National Museums Liverpool (NML), the project archaeological advisers.

Email of 11th January 2015

Paragraph 7 of Mr Walters' email implies that dismantling of the stables was not monitored archaeologically or that this was not conducted to an appropriate standard. In fact, the dismantling of the stable block was completed in accordance with an agreed methodology and the resulting stone is, to this day, safely stored at Moneystone Quarry. The works were completed in late 2006 in full accordance with the listed building permission (application reference SM98-0282LB), which was approved in September 1998. This application was submitted in order to discharge condition 10 of the 1998 mineral working permission (application reference SM.96/935), which specified that no mineral working beneath the stables should be undertaken until such a permission was granted.

The dismantling of the stables was monitored by Colin Hayfield (an independent archaeologist with no connection to NML who had no involvement with the Moneystone Park project) and a report, 'Whiston Eaves Stable-Block, Nr. Staffordshire; Structural Recording 1998-2006' was submitted to the Staffordshire Historic Environment Record (HER). The contention that these works were done after Laver Leisure acquired the site is not correct and, for the avoidance of doubt, at no point were Laver Leisure ever owners of the stone from the dismantled building.

The report submitted to the HER states (p.9) that "Numerous visits to the site were made to monitor the process of dismantling of the buildings. This produced few new revelations about the buildings...." and includes photographic evidence to support this statement (for example, Plate 3a which shows dismantling by hand in progress). The project appears to have been conducted to a professional standard and to have adequately met the requirements of the brief. Therefore at the time of writing the Environmental Statement

Planning and Environmental Advisers

Partners:

Gary Halman BSc FRICS MRTPI
Richard Woodford BA (Hons) BSc BTP MRICS MRTPI
Jon Suckley MTCP (Hons) MRTPI
Richard Barton BSc (Hons) MA MRTPI
Fiona Woodford
Julie Halman

Associates:

Daniel Brown BA DipTP MRTPI
Keith Jones BA (Hons) MSc MRTPI
Chris Peacock BSc MA CEnv MIEMA
Conor Vallyelly MTCP MRTPI

HOW Planning LLP

Registered Office: 40 Peter Street, Manchester M2 5GP
Registered in England and Wales Registered Number: OC318465
HOW Planning LLP is a Limited Liability Partnership
Any reference to Partner means a member of HOW Planning LLP

(ES) we had no reason to doubt that the site had been cleared and it was consequently a very low priority on any subsequent walkover. The building is now recorded on the Staffordshire HER as having been ‘...dismantled between 1998 and 2006.’ No concerns were raised during the dismantling process, during which regular update were provided at steering group meetings which were chaired by Staffordshire County Council and attended by other key stakeholders including the project stonemason.

Colin Hayfield made no recommendations in his report for further work on the stables site and no planning condition to conduct such work was imposed. Therefore, it was reasonable to assume that there was no requirement for further archaeological intervention, for example a watching brief, prior to the commencement of quarrying operations and that this presumption should extend to Laver Leisure’s proposals. It should also be noted that the report presents a convincing case that the stables had been constructed on a new site in c.1808 and that there was therefore little potential for earlier deposits within the site bounds which would be the normal trigger for additional fieldwork on a project of that type.

Paragraph 2 states that “...part of the actual original grade 2 listed stable block was [discovered by Mr Walters] in situ in December last year...” and paragraph 14 features a detailed description of the remaining section of walling. Archaeology Services accept the walling seen may be part of the stables; indeed, Colin Hayfield’s report suggests that this is likely but its presence does not prove the existence of extensive remains from the stables within the quarry boundary. Sibelco has confirmed that the north-easterly corner of the building was left in place to simply mark the position of the building.

The only below ground remains are those that actually underpin the road. Over many years, as the road has been improved, the northern base (foundation) stones were effectively buried by new road materials and as such, are an integral part of the road construction. At no point was it ever suggested or proposed that these stones be removed. In 2007, the footprint of the former building was quarried, but not to full depth. This was done to ensure that the area was made safe before extraction could take place beneath it, i.e. to avoid the building slipping into the quarry void. NML has confirmed that the remaining foundations are not of any great archaeological significance.

Paragraph 16 states that the report (presumably the ES or the Technical Appendix) “... claims to have carried out extensive field work”. The technical report is quite explicit that fieldwork was confined to a walkover of the area around the site and that the quarry itself was not visited. NML did not include the former stables site in its walkover for reasons detailed below:

1. It lay within the limits of the quarry. It is worth noting that the final lines of Paragraph 13 imply that the HLC data supplied by the Staffordshire HER does not reflect quarrying operations since 2006. This is not the case and Archaeology Services supplied a copy of Figure 2 from the technical appendix to support this; the figure clearly shows a greyed out area over the quarry extension.
2. Documentary evidence confirmed that the site had been destroyed.
3. The documentary evidence provided no evidence for any activity on the stables site prior to 1808.
4. At the time of the walkover survey some of the areas of pasture surrounding the site lay within Laver Leisure’s proposed site boundary and it was decided to focus upon these as the areas of greatest archaeological potential/threat.

It was not the function or the intent of NML’s report, included within the submitted ES, to comment upon the stored building materials or the reconstruction of the stables as the proposed development could have no effect upon them.

As you are aware, in 2013 a planning consent was granted by Staffordshire Moorlands District Council to rebuild the stable block in accordance with the requirements of the 1998 mineral consent. This was subject to full public consultation on two occasions but on neither occasion were the issues that Mr Walters refers to ever mentioned by any stakeholder or third party. The appointed project architects are now working for the party that will implement the consent. The current programme is to start this work towards the end of this year and, for the avoidance of doubt, will involve all the stone stored at Moneystone Quarry. It is worth noting that the replacement of the building in its previous location is not possible given the quarrying operations which have resulted in significant topographical changes. Furthermore, the building was subject to substantial changes over its lifetime, as evidenced by historical maps, and was likely built from stone used previously in other buildings. This indicates that its reconstruction in another location is not out of character with its history.

Letter of 19 May 2015

Mr Walters raises the possibility of Prehistoric layers below the stable block; however, the potential for this is, at most, negligible. Firstly, the mound referred to is only listed on the Historic Environment Record as a 'possible' burial mound, it was never investigated and there is no proof of this interpretation. It is highly speculative to project that in situ deposits on the stables site. Secondly, construction of the farm and stable block would have severely disrupted any prehistoric layers which may or may not have been present. Finally, even if such layers were present and had survived construction of the stables they would have been further disturbed or destroyed during demolition.

All of Mr Walters' other concerns about the archaeology on the site of the stable blocks could be addressed by a watching brief during construction as described in Stephen Dean's (Principal Archaeologist, Staffordshire County Council) letter of 25 July 2015 (Ref SMD/2014/0682) and the approach specified is reasonable and proportionate.

The issue of re-ploughed fields was dealt with in NML's response to Mr Walters' previous correspondence, where it was stated that the section of text referred to is a standard phrase inserted in all of our desk-studies and refers to the methodological approach. Later in the text it is made quite clear that all of the areas walked were under pasture.

The mound he refers to in his recent letters may well be an archaeological feature; possibly an industrial feature as he suggests. However, as it lies outside of the planning application boundary it is largely irrelevant to the case and explains why it was not noted on the walkover. Given its location there is no potential for a direct effect on it from the development. There may be a minor indirect impact upon its setting, though this would be of negligible significance.

I trust that this satisfactorily addresses any concerns held by SMDC in relation to the potential effects on archaeology and heritage. Please do not hesitate to contact me if you require anything further.



Christopher Peacock

Associate

Direct Dial: 0161 831 5879

Mobile: 07889 119 617

Email: christopher.peacock@howplanning.com