Council for
British Archaeology

A National Amenity Society

Mr Chris Johnson
Planning Case Officer
Staffordshire Moorlands District Council
By email: Planning@staffsmoorlands.gov.uk.

22nd August 2019

Dear Mr Johnson

Hermitage Farm, Froghall Road, Froghall, ST10 2HQ. Application No. SMD/2019/0394

Thank you for consulting the Council for British Archaeology (CBA) on the above case. Based on the information supplied with this application, we offer the following observations and advice to assist your authority in determining the application.

Summary
The CBA has concerns regarding the impact of the above application on the historic, archaeological and architectural interest of the Listed Grade II Barn and the Listed Grade II Hermitage Farm. We raise the following points:

- The application lacks an appropriate heritage statement that assesses significance and impact as required by the National Planning Policy Framework paragraph 189.
- The scope of works details interventions into the site that may harm heritage significance and value.

Significance
The Listed Grade II Barn is an early 18th century agricultural building associated with the Listed Grade II Hermitage, a late 17th century farmhouse. Although the barn has been converted to holiday lets in the late 1990's, much of the original evidential value associated with its former agricultural use have been retained. Interventions into the fabric of the barn have been kept to a minimum and consequently, it continues to contribute to the agricultural context of the Hermitage Farm site as do all the other retained agricultural buildings.

Comments
The National Planning Policy Framework (NPPF) is clear regarding the requirements for applicant's, "*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant*

historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary…" (paragraph 189)

Although the application is accompanied by a Design, Access and Heritage Statement, the heritage element does little to address the significance of the farm complex. The scope of works as stated in the application comprise, "*Demolition of three agricultural (storage/cattle) sheds and creation of enclosed garden areas to serve the cottages in the adjacent stone barn conversion, together with creation of a 12-bay car park with access track, manoeuvring area and stone retaining walls*". All these proposals may harm the setting and significance of the Listed Grade II Barn and the Listed Grade II Hermitage Farm.

Whilst we consider there is scope to achieve a sympathetic conversion and re-use of this important and significant historic site that helps better reveal its significance (subject to satisfying local policy matters). This will be dependent on a far more extensive Heritage Statement which considers the site's significance against impact and revised proposals that clearly set out how harm will be minimised. We believe that in this instance, a successful heritage statement will be best prepared by an historic buildings' specialist and more comprehensive plans provided that clearly illustrate 'as existing' and 'as proposed' for the site including detailed landscape proposals.

Recommendation

The CBA recommends that the Local Planning Authority work with its conservation advisors to secure a more appropriate heritage statement that fully addresses the significance of each part of the Listed Grade II assets and their setting that are affected by the proposals and ensure that any adverse impacts are minimised. The NPPF requires that, "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*"(Paragraph 193)

It is important that the National Amenity Societies and others can fully appreciate the significance of heritage assets and any potential impacts on significance so that we might better advise and comment. Because our remit is national we are generally unable to carry out site visits or hold pre-application discussions with owners or Conservation Officers. We therefore largely rely on desk based assessments via Local Planning Authority on-line resources to guide our comments and fulfil our Statutory responsibilities.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Bob Sydes MCIfA
Listed Buildings Caseworker for England

Council for
British Archaeology

The Council for British Archaeology (CBA) is the National Amenity Society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications – notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2015**.

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Council for British Archaeology
Beatrice de Cardi House, 66 Bootham
York YO30 7BZ
Tel: 01904 671417

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www.archaeologyUK.org

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