

Rural County (Environmental Advice)

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FAO Arne Swithenbank

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Telephone:

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Please ask for: Laura Pritchard

12 December 2023

Our Ref: HoEC/EC3210/SM/LP/CST9543 **Your Ref:** SMD/2023/0587

Dear Mr Swithenbank,

LAND AT BACK LANE, BELLE VUE ROAD, LEEK

Thank you for your consultation request regarding the planning application for the proposed detached 4 bedroom dwelling with retaining wall and temporary structure to be erected then removed upon completion of the dwelling at the above location. This letter represents the response from Staffordshire County Council's Historic Environment Service regarding historic environment issues associated with the proposals.

The application has been assessed in light of information held by the Staffordshire Historic Environment Record (HER), historic mapping, the Heritage Assessment (HA) and Structural Survey (SS) submitted in support of the application and associated datasets including the Leek Extensive Urban Survey (HUCA 17 Belle Vue, Mill Street, and Kiln Lane - visit the Staffordshire County Council website and search for Extensive Urban Survey for more), all of which have highlighted some archaeological/historic environment interest in the proposal site and its immediate vicinity. The site forms part of a post-medieval industrial site which contains evidence of industrial activity including a rock cut chamber, flue, nearby oven and possible associated brick buildings. The kiln

features are cut into the underlying bedrock, some 3-4m below the proposed development area.

A short report by the Staffordshire Industrial Archaeology Society produced in 2019 following a site visit suggests that the area to the immediate north of the application site (i.e. the retaining wall below the bank upon which the proposed new house will stand) comprises a 'substantial millstone grit wall, with an arched opening to the side, which may or may not be associated with lime burning activity'. It was also noted that 'there is also evidence of a former roofed shelter over part of the site, which may or may not be connected with lime burning activity', and 'that the area above the kiln site (i.e. the current site) has been levelled and planning permission presumably given for development, which started as foundations, but is now overgrown'. Google StreetView and recent aerial photography corroborate the above situation. A site visit undertaken as part of the HA identified a possible void in the northwest corner of the site, which may have been a kiln pot for one of the kilns to the north. The kilns to the rockface were inspected as part of the SS. They were observed to have been almost completely infilled with rubble, so how far they extend beyond the rock face could not be confirmed. The kilns appear to be in very poor condition with loose, friable rock which is collapsing in places. Brick arched lintels have been built to the entrances of two of them, although the brickwork is in extremely poor condition and requires extensive remedial work to prevent further deterioration and possible collapse. The SS surmises that as it is understood that the site levels have been reduced in the past down to bedrock level, the foundations for the proposed development are therefore likely to be traditional shallow spread strip footings founded on the rock, and the excavations involved are likely to be minimal since the current site level is at or about rockhead level.

The Scheduled Monument of Brindley's Mill and two Grade II listed buildings are all located within view of the proposed development. The HA has assessed the impact of the proposed development on the setting of these designated heritage assets, and I am happy to defer to your Conservation Officer colleague with regards to the conclusions reached on the potential impact of the proposed development on nearby designated heritage assets.

Archaeological Recommendations

Despite the assertions given in the SS that excavations relating to the proposed development will be minimal and that the construction of the

development will have no detrimental effect on the below-ground archaeological remains, there undoubtedly remains the potential for the scheme to encounter archaeological deposits associated with post-medieval industrial activity. Taking the above into consideration, together with the nature and scale of the proposals, should permission be granted, it is advised that an archaeological watching brief be maintained on all groundworks, such as foundation trenches, service runs, significant landscaping/engineering/clearance works. The watching brief should be scalable to a strip, map and sample excavation should significant archaeological remains be observed during the archaeological monitoring works.

This approach, i.e. archaeological watching brief, is supported by NPPF (2021) para 205 which states that ‘... they [Local Planning Authorities] should also require developers to record and advance understanding of significance of any heritage asset 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.’ The works should be undertaken by an appropriately experienced archaeologist working to the requirements of a brief prepared by this office (or approved Written Scheme of Investigation (WSI), the Chartered Institute for Archaeologists (CIfA) Code of Conduct and to a level commensurate with the relevant CIfA Standards (2023) and Universal Guidance (2023).

It is also suggested that consideration is given to conditioning, or through other means (such as a planning obligation), the installation of an interpretation panel to raise public awareness of this industrial site and its history, ideally on the lower level of the industrial complex near Kiln Lane. Likewise, I understand that the lime kiln arches (the poor condition of which is highlighted in the reports) are under the control of a third party, however it would be advantageous if it were possible to condition (or otherwise) that remedial works be undertaken to these to prevent further deterioration and loss.

Suggested Condition

The above works* could be most satisfactorily secured via a condition attached to any planning permission for the scheme. This condition should read:

A) “Prior to the commencement of the development hereby permitted, a written scheme of archaeological investigation (‘the Scheme’) shall be submitted for the written approval of the Local Planning Authority. The Scheme

shall provide details of the programme of archaeological works to be carried out within the site, including post-fieldwork reporting and appropriate publication.

B) The archaeological site work shall thereafter be implemented in full in accordance with the written scheme of archaeological investigation approved under condition (A).

C) The development shall not be occupied until the site investigation and post-fieldwork assessment has been completed in accordance with the written scheme of archaeological investigation approved under condition (A) and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured."

Should you have any queries regarding the content of this letter, please don't hesitate to contact me.

Yours sincerely,

Laura Pritchard

Environment Specialist (Archaeology)

*Applicant please note that in May 2018 Staffordshire County Council's Historic Environment Team, archaeological advisors to Staffordshire Moorlands District Council, introduced a charged-for curatorial service for planning applications with archaeological conditions. Our curatorial service will be charged at a single fee per application and may include: production of a brief/specification (where deemed necessary), review and validation of any submitted written schemes of investigation, monitoring visits (if deemed necessary), review and validation of any submitted reports, liaison with local planning authority and anything that will enable us to recommend discharge of conditions. Fees are based on the size of the development. The production of a brief/specification to inform the tendering process and additional monitoring visits can also be purchased separately. These fees should be paid in advance by your appointed archaeological/historic environment organisation/contractor (who should include them in their tender quote) or by the applicant/agent using our online payment system. More details can be found here:

<https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Advice-and-guidance.aspx>