

From: Andrew Myers (Place) <Andrew.Myers@derbyshire.gov.uk>
Sent: 10 November 2021 16:09
To: SDDC Planning Applications
Cc: Steve Baker (Place)
Subject: FAO Tom Beardmore - Archaeological Consultation: DMPA/2021/0933 Hall Farm, Twyford Road, Twyford, Derby, DE73 7HJ

Dear Mr Beardmore,
Archaeology Consultation

The conversion and extension of buildings to form 4no. dwellings with associated alterations and proposed new access at Hall Farm, Twyford Road, Twyford, Derby, DE73 7HJ

Dear Mr Beardsmore,

Thank you for your consultation on the above application.

The application concerns the conversion and extension of existing agricultural buildings falling within the curtilage of grade II listed (1039096) Twyford Hall. A range of the outbuildings (plots 2 & 3 of the current application) are separately grade II listed (82788). All of the proposals fall within the historic curtilage of Twyford Hall as well as the designated Conservation Area of Twyford.

The application has been submitted supported by a detailed Heritage Statement (HS) prepared by Phillip Heath, a Report on Structural Condition (SC) prepared by Mark Dady Associates and a Planning, Heritage, Design and Access Statement (PHDA) by CT Planning. No archaeological desk-based assessment (DBA) has been produced and none of the above reports set-out to identify or discuss the archaeological interest.

The proposals have been carefully developed to minimise impact upon the upstanding fabric of plots 2, 3, 4 and 5. It should be noted however that some loss of original fabric is entailed In, for example, removing internal walls and creating new openings. Whilst the SC indicates that existing concrete flooring within barns B and C (plots 4, 2 and 3) could be retained and reused subject to architectural requirements there is no formal ground slab within building A - the cartshed (plot 5). Here a new slab would need to be established, and there would be associated levels of ground disturbance. There appears to be no discussion in any of the reports mentioned of damp proofing measures for the existing buildings. Following demolition of an existing steel framed barn the conversion of plot 4 will also be associated with new build for an extension and garaging some of which will lie within the footprint of the demolished barn. Again, there will be some ground disturbance associated with this activity. Finally, in the northern part of the proposal area a new access road will be established for more than 60m running from the existing access road. The creation of this road will also involve ground disturbance.

The Historic Environment Record contains entries for the Hall and its outbuildings. It also contains records in the immediately adjoining fields for the cropmark of a prehistoric Ring Ditch (MDR4314), the site c.160m to the ENE of the ploughed-out Twyford and Stenson Bronze Age Barrow (MDR14483) and areas of medieval ridge and furrow (16519). In the context of determining applications National Planning Policy Framework (July 2021) paragraph 194 directs that where a site proposed for development “includes, or has the potential to include heritage assets with archaeological interest” LPAs “should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”.

Whilst the archaeological interest within the present application extends to the upstanding buildings in this instance the HS does provide a detailed historical account and context, as well as some useful photographic images. Given the care taken in minimising any loss of original upstanding fabric it is perhaps unnecessary to require further building survey and recording. However, there will be some ground disturbance associated with aspects of the proposals dealing with certain buildings (plots 4 & 5), and most notably in the groundworks required to establish the new access track. In the absence of an archaeological desk-based assessment there is no independent statement on the potential for the disturbance of below ground archaeological remains, their significance, and the loss of significance resulting from their disturbance. Given the character, limited and

defined extent of the proposed works I advise that the archaeological interest, in this instance, can be protected through a conditioned approach. I advise that a negative condition be attached to any planning consent requiring that before any development related work commences a Written Scheme of Investigation covering an archaeological watching brief on all development groundworks has been commissioned, submitted to the Local Planning Authority and approved by the LPA's archaeological advisor. The following condition wording should be used to secure the necessary archaeological work.

"a) No development shall take place until a Written Scheme of Investigation for archaeological monitoring has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions; and

1. The programme and methodology of site investigation and recording
2. The programme and provision to be made for post investigation analysis and reporting;
3. Provision to be made for publication and dissemination of the analysis and records of the site investigation
4. Provision to be made for archive deposition of the analysis and records of the site investigation
5. Nomination of a competent person or persons/organization to undertake the works set out within the Written Scheme of Investigation"

"b) No development shall take place other than in accordance with the archaeological Written Scheme of Investigation approved under condition (a)."

"c) The development shall not be occupied until the site investigation and post investigation reporting has been completed in accordance with the programme set out in the archaeological Written Scheme of Investigation approved under condition (a) and the provision to be made for publication and dissemination of results and archive deposition has been secured."

Yours sincerely

Andrew Myers

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