

## Grindell, Georgina

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**From:** Baker, Stephen (Economy Transport and Communities) <Stephen.Baker@derbyshire.gov.uk>  
**Sent:** 02 February 2017 15:45  
**To:** Planning  
**Cc:** Bradbury, Jonathan; Askey, Mark; Ward Natalie (Natalie.Ward@peakdistrict.gov.uk); Allen, Tim (Tim.Allen@HistoricEngland.org.uk)  
**Subject:** 16/00923/OUT Cawdor Quarry, Permanite Works And Part Of Snitterton Fields, Matlock Spa Road, Matlock. Development of 586 dwellings, incorporating 78 affordable units etc - archaeology comments

DERBYSHIRE DALES D.C.	
REGULATORY SERVICES	
OFFICER	JB
REF	16/00923

Dear Jon,  
Thank you for consulting on the above planning application.

### ***Below-ground archaeological remains***

The application is accompanied by an archaeological desk-based assessment produced by Pre-Construct Archaeology.

The proposal site of c22ha is largely contained within the previously-worked ground of Cawdor Quarry, where archaeological potential is limited to remains of the quarry operation itself. The historic stone quarry does however have an entry on the Derbyshire Historic Environment Record (HER 30811) and should therefore be assessed for historic interest and significance. This aspect of the site is not adequately covered in the archaeological study, which focuses primarily on the greenfield part of the site to the west.

The 'Snitterton Fields' part of the development, to the west of the historic extent of Cawdor Quarry, is close to the Scheduled medieval moated site and fishponds at Snitterton (HER 12715), evidence for medieval village earthworks (HER 12717) and to evidence for historic lead mining and processing (rectangular enclosures at HER 12725, shafts shown on historic and modern mapping, the line of the Orchard Sough and Sough Tail at HER 12757). The latter fall into areas not within the red-line boundary but proposed for landscaping as open space within the application documents. Aerial photography shows earthwork features within the site itself, extending into the fields further west and possibly representing activity associated with post-medieval leadworkings or with the medieval village.

Because the desk-based assessment contains no assessment of the quarry site, or further interpretation of the earthworks within the site I judge that it does not meet the requirements of NPPF para 128 in relation to below-ground archaeological remains. This could be addressed by undertaking a study and statement of significance for the quarrying remains, and by plotting of earthworks and geophysical survey on the Snitterton Fields area and any extension where landscaping proposals could impact below-ground archaeology.

### ***Setting of designated heritage assets***

The proposal site is within the close setting of a number of designated heritage assets, notably the Grade I Listed Snitterton Hall (400m from the red-line boundary) and the Scheduled moated manor and fishponds (160m). The application contains landscaping proposals for the field immediately west of Snitterton, and these would bring development impacts closer still.

With regard to the setting of designated assets the local planning authority should be guided by the advice of its conservation officer (Listed Buildings), Historic England (the Grade I Listed Building and the Scheduled Monument) and the Peak District National Park Authority (because a number of the assets lie within the National Park boundary). The heritage information contained within the application in relation to designated assets is extremely thin: Listed Buildings are covered with the Design and Access Statement, and the setting of the Scheduled Monument is mentioned within the archaeological desk-based assessment. In neither case is the five-step process outlined by Historic England within guidance on the setting of heritage assets followed: there is no assessment of significance, no consideration of how aspects of setting contribute to significance, and no quantification of the

magnitude of the proposals harms/benefits. The application is therefore seriously deficient against NPPF paras 128 and 129.

I wish to offer some comments on the setting/significance of the Scheduled medieval manor site. The significance of the asset derives from its evidential value as an earthwork medieval site, but also from its place within a historic landscape which includes the village of Snitterton, the surrounding fields which fell within its manorial landholding, associated medieval village earthworks and ridge-and-furrow, and the Grade I Listed Snitterton Hall which was its successor as seat of the manor. The site therefore has a strong historic relationship with the village of Snitterton and with its surrounding landscape, and this is reinforced by views across and through the moated site from the network of footpaths to the west and from vantage points on higher ground – towards Oker and Oker Hill to the west and north-west, and from the slopes rising behind Snitterton towards Bonsall Moor. The settlement as a whole, with its heritage assets, has a hidden quality and a sense of deep time, with its medieval assets sitting within what appears to be a deeply rural landscape despite being only minutes from the centre of Matlock. The re-vegetated edge of Cawdor Quarry reads in these views as a belt of woodland, and the nearest sense of an urban edge is therefore the development along the line of the A6 to the north of the Derwent around 950m away.

The part of the proposal site immediately west of Cawdor Quarry contains some earthworks yet to be properly assessed. These are perhaps most likely to represent post-medieval lead-mining but there may also be features linked to the medieval village and its environs. There may consequently be a contribution to significance made by contemporary features. The two fields in question also make an important contribution in maintaining a sense of the rural landscape context and setting of Snitterton and its heritage assets, as a buffer zone between the assets and the urban edge of Matlock. Introducing housing into this area would create an urban edge now only 160m from the Scheduled Monument (and 400m from the Grade I Listed Hall). This is a substantial change within the close setting of these designated assets, and would introduce a sense of urban sprawl into key views towards and across the moated site. This would not be mitigated by the proposed screening clumps of trees in the field between the development and the scheduled site – these would appear visually intrusive and out-of-character in both landscape and historic landscape terms.

Lack of heritage information notwithstanding, I therefore feel that it is possible to conclude that the proposals will represent harm to the significance of the Scheduled Monument and the Grade I Listed Hall, through erosion of the experience of Snitterton as a medieval settlement in a rural landscape which retains a strong sense of deep time. A more exact quantification of harm is not possible in the absence of any detailed visualisations of the development proposals in views to/from/of the heritage assets, but in NPPF terms it is likely to represent 'less than substantial harm'.

NPPF paras 132 and 134 require that such harms be given 'clear and convincing justification' and – if the development is granted consent – should be shown to be outweighed by public benefits of the development proposals. This can include socio-economic benefits associated with housing development. However, in the current case, a similar level of socio-economic benefit could be delivered by housing development within the former confines of Cawdor Quarry, taking advantage of the developed screening afforded by the revegetated quarry edges which provide a logical and natural boundary to conserve the heritage and landscape significance of the landscape to the west. Because the socio-economic benefit could be delivered with zero or minimal heritage harm within the former quarry, the harms arising from expansion of the development towards Snitterton are not justified.

I therefore recommend that the proposals in their current form should be refused consent, because of harms to designated heritage assets which are not outweighed by public benefits (NPPF paras 132/134).

Regards

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