



# Wyre Forest District Council

Economic Prosperity and Place Directorate

## RESPONSE FROM CONSERVATION OFFICER

### **Planning Permission**

To: Paul Round

Application No: 19/000053/CM

Description of development: Proposed sand and gravel quarry with progressive restoration using site derived and imported inert material to agricultural parkland, public access and nature enhancement

Location: Land at Lea Castle Farm, Wolverley Road, Broadwaters, Kidderminster, Worcestershire

Comments: The applicant has provided a technical appendix in support of this application: H - Archaeology and Cultural Heritage  
H.1 Archaeological Desk-based Assessment H.2 Written Scheme of Investigation.

This assessment has identified and described the significance of the various heritage assets, both designated and undesignated within the site and within a radius of 1km of the centre of the site, and is thus in accordance with the NPPF paragraph 189.

It also considers the impact of the development on the identified heritage assets and scopes some out of further assessment because there are no identified potential impacts.

**At 5.1.2 the assessment refers to the “Wolverley and Staffordshire Canal Conservation Area”. This is incorrect. There are two conservation areas: a) Wolverley and b) The Staffordshire and Worcestershire Canal Conservation Area.**

The assessment at section 6 summarised the potential impacts of the proposal on heritage assets as follows:

*The proposal indicates that most of the site, with the exception of the south-eastern part of the site, will be developed, either for mineral extraction or for a compound and plant area. The existing tracks, which are relics of the park avenues will be retained, and a new access road built onto Wolverley Road, to the east of Broom Cottage. Once the mineral resource is extracted the proposal indicates site will be reinstated and returned to agricultural use. A new stand of trees will restore Broom Covert, and trees will also be planted along the former avenues. Any potential below ground archaeological remains are likely to be completely removed during mineral extraction, or destroyed during the construction of new roads and compound areas.*

*Generally preservation of the former Lea Castle Park*

*(WSM28847) is poor, and its quality has been compromised by its use as agricultural land for 50 or more years. As such the park is only of local significance. The proposed development does not directly impact on any of the surviving park features except one short section of former park boundary wall (AHA01), and the restoration scheme will ultimately result in the reinstatement of the wall, as well as the tree lined avenues and Broom Covert. As such the impact of the development is overall considered to be **Not Significant** on the former park. No evidence of the grass landing strip has been identified during the assessment and it is of negligible significance.*

*There will be an impact on the setting of the regionally significant Grade II listed North Lodges and the locally significant undesignated south lodges, Leacastle Farm, Broom Cottage and Keepers Cottage. However, all these heritage assets are broadly screened from the site by banks of woodland and as such any impact will be **Minor Adverse**, during mineral extraction. Given that the proposal includes reinstatement of the site to agricultural activity, replanting the parkland avenues with rows of trees, and restoration of Broom Covert, the long term impact of the mineral extraction on the setting of these features is considered to be **Not Significant**.*

*Other built heritage assets in the Study Area are completely screened from the site and have been scoped out of this assessment.*

The assessment at section 7 concludes:

*The survival of heritage assets within the Study Area has been outlined above and the following assessment has been made. There is limited evidence for prehistoric and Roman activity in the Study Area in the form of isolated find spots of various dates and the identification of the geological deposits which may have potential for Palaeolithic remains to survive. There is also limited evidence for early medieval and medieval activity in the Study Area, and early historic mapping indicates that the site was probably agricultural (or common) land until the late 18th or early 19th century. Evidence for any activity of the prehistoric, Roman, early medieval and medieval periods would likely be considered informative at local or regional level and therefore of local to regional significance. However, given the very limited representation of such material within the Study Area the potential for survival of assets dating to these periods within the site is considered to be low. Historic mapping and other documents indicate the site was developed as parkland around Lea Castle during the early 19th century. The park was sold off around the 1930s or 40s, and the parkland was converted to agricultural use which has compromised the value of the park. The western part of the site was also used as a grass landing strip. Any archaeological evidence from the post-medieval and modern periods would probably relate to agriculture, parkland and/or the landing strip and therefore considered as only locally informative, and of low or negligible significance. No designated monuments are located on or immediately adjacent to the site. It is not anticipated that any designated assets recorded in the Study Area will be significantly affected by the development, although there will be*

*a minor adverse impact on the setting of the Grade II listed North Lodges and Gateway to Lea Castle, which is located about 250m away from the site boundary. However restoration of some of the parkland features, including tree lined avenues and Broom Covert will reduce the long term impact of the mineral extraction to an insignificant level.*

I have no issue with the assessment criteria or conclusions of the assessment in general in general, however I have some concerns about the following:

1.

### **Staffordshire and Worcestershire Canal Conservation Area**

The Staffordshire and Worcestershire Canal Conservation Area which crosses the western part of the Study Area is excluded from further assessment because it is totally screened by trees and topography. As it lies outside the Area the provisions of the P(LBCA)1990 s.72 cannot apply, and WFDC Policy SAL.UP6 refers to not adversely affecting views into, within or out of the Conservation Area, so that cannot be relied upon either.

I am concerned however that the nature of the proposed development may create noise, dust or other environmental conditions which have a harmful impact on the intrinsic character of the Canal Conservation Area as experienced by those within it. At this location the Area runs through a particularly tranquil setting, quite different from the industrial and urban landscapes of Stourport and Kidderminster and this is noted in the Conservation Area Appraisal.

The impact of potential noise, dust or other environmental conditions affecting species or flora and fauna within the Conservation Area should be considered by the relevant consultees.

2.

### **Destruction of below ground archaeological remains by the process of sand and gravel quarrying**

The assessment states: "*Lea Castle (WSM15003) was built in the early 19th century by John Knight and much of the surrounding park was probably also laid out and established around this period (WSM28847)*".

Development on the former parkland has potential to affect below ground historic environment the significance of which is unknown. Whilst ploughing since WW2 may have removed evidence of upstanding parkland features there may exist opportunities to better understand the layout of these areas than that afforded by reference to mapping.

Building recording will mitigate removal of any surviving above ground heritage assets. In terms of mitigating impact on below ground archaeology it may be necessary to undertake fieldwork to fully understand the resource. Where development may result in the loss of archaeology, recording will be required by

an appropriate professional.

I suggest that Worcestershire Archive and Archaeology Service is invited to suggest appropriately worded condition(s) covering the above issues

### **Conclusions**

The complete loss of undesignated heritage assets should be considered in the context of their significance and any benefits associated with the development proposal. Unfortunately we will not really fully understand the significance of any remaining below ground heritage assets until they are excavated. I suggest that this element of research is required to be completed prior to any quarrying operations commencing.

The main impacts on the surrounding designated heritage assets appear to potentially be environmental in terms of noise and dust, which will require sensitive mitigation if this is not to impact also on the flora and fauna associated with those assets.

**Recommendation**            No objections.

**Conservation Officer**

**Date:**

**Peter Bassett**

**27<sup>th</sup> February 2020**