

**From:** Hancox, Emma  
**Sent:** 22 December 2020 07:51  
**To:** Development Control team  
**Subject:** RE: Further Information (Regulation 25) - Land at Lea Castle Farm, Kidderminster, Worcestershire - Ref: 19/000053/CM  
**Attachments:** 19000053Advice to the LPA.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Steve,

Thank you for re-consulting on this application. The additional information does not alter my previous views as laid out in my letter of 18<sup>th</sup> March 2020 and attached for your convenience.

Regards,

Emma

---

**From:** Development Control team <DevControlTeam@worcestershire.gov.uk>  
**Sent:** 19 November 2020 13:10  
**To:** Hancox, Emma <EHancox@worcestershire.gov.uk>  
**Subject:** Further Information (Regulation 25) - Land at Lea Castle Farm, Kidderminster, Worcestershire - Ref: 19/000053/CM

Dear Emma,

**Re-Consultation on a Planning Application (County Matter)**  
**Town & Country Planning Act 1990 (as amended)**  
**Town and Country Planning (Environmental Impact Assessment) Regulations 2017**  
**The Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020**

**Submission of Further Information in respect of the Environmental Statement relating to the following planning application**

**Application Ref:** 19/000053/CM **Grid Ref:** (E) 383959, (N) 278992

**Applicant:** NRS Aggregates Ltd

**Proposal:** 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

On 10 January 2020 NRS Aggregates Ltd applied to Worcestershire County Council for planning permission for the above proposal. You will recall I consulted you on the above application for planning permission in February 2020.

Following the consideration of the comments that were received on the application and Environmental Statement, the County Council wrote to the applicant in June 2020 requesting further information in

respect of the Environmental Statement. On 27 October 2020 the applicant submitted the requested further information, and the County Council are now seeking comments on this further information in relation to a number of matters including: water environment, ecology and biodiversity, landscape, agricultural land classification and soils, cultural heritage, transport movement and access, rights of way, and restoration and aftercare.

The applicant is seeking planning permission to extract approximately 3 million tonnes of sand and gravel over a total of 6 phases. The land would be progressively restored using site derived and imported inert material to agricultural parkland, public access and nature enhancement. The applicant estimates the development would take approximately 11 years to complete.

A copy of this further information together with the planning application, the plans, the Environmental Statement, the Non-Technical Summary and other documents submitted with the application can be inspected online at: [www.worcestershire.gov.uk/eplanning](http://www.worcestershire.gov.uk/eplanning) using the application reference 19/000053/CM until **4 January 2021**. When searching by application reference, please ensure that the full application reference number, including the suffix are entered into the search field. **Please note:** when viewing the County Council's Planning Application Website you may wish to use an internet search engine such as Google Chrome, Firefox or Microsoft Edge for improved performance and functionality compared to Microsoft Internet Explorer.

I would be grateful to receive any comments that you may wish to make on the further information / application by **4 January 2021** by email or by post to the address below. If this is not possible then please let me know.

***Due to the coronavirus (COVID-19) pandemic the majority of Council staff are working remotely. We have made arrangements for letters sent via the postal service to be distributed to the appropriate officer. Where possible, we encourage all comments / correspondence to be submitted by email or online using the above link.***

Please note that all correspondence regarding any planning application will be available for inspection by the applicant and any interested third parties.

Please do not hesitate to contact me if you have any queries.

Kind regards

Steve

**Steven Aldridge**

Team Manager – Development Management

Worcestershire County Council

County Hall, Spetchley Road, Worcester, WR5 2NP

**Tel:** 01905 843510

**Mob:** 07985334367

**Email:** [saldridge@worcestershire.gov.uk](mailto:saldridge@worcestershire.gov.uk)



**Steve Aldridge**  
**Worcestershire County Council**  
**County Hall**  
**Spetchley Road**  
**Worcester**  
**WR5 2NP**

Worcestershire Archive &  
Archaeology Service  
The Hive  
Sawmill Walk  
The Butts  
Worcester  
WR1 3PD

16<sup>th</sup> March 2020

Our ref: CWR13505  
Your ref: 19/000053/CM

Dear Steve,

**Ref: 19/000053/CM Land at Lea Castle Farm, Wolverley Road, Broadwaters, Kidderminster, Worcestershire**

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

I have checked the Worcestershire Historic Environment Record and read through the documentation submitted with the planning application. I broadly concur with the assessment presented in the cultural heritage statement and desk-based assessment with regard to the archaeological resource and impacts to the historic environment. The applicant has provided enough historic environment information to determine the application in accordance with NPPF para 189. I do not object to the development, but there will inevitably be impacts to the historic environment and these must be mitigated through conditions on any grant of consent as detailed below.

The proposed Written Scheme of Investigation submitted with the planning application details a strategy for a strip, map and sample approach to the site as each phase comes forward. I concur with this strategy, however, I would also expect to see a field walk of the arable areas prior to topsoil strip. The wider landscape has shown the potential for flint scatters of prehistoric date to survive on the surface of ploughed fields. These would be lost if not looked for prior to the soil strip.

The desk-based assessment fails to mention (in 5.2.1) that a handaxe, classified as Middle Palaeolithic, was found c.320m to the west of the proposed development area, within the top of the Holt Heath sand and gravel member. This terrace spans Marine Isotope Stages 5a to 2: around 82 to 14,000 years ago. The artefact may, therefore, be late Middle Palaeolithic (c60-40,000 years old), but the finders noted that it had been lightly rolled, so it is possible that it comes from earlier deposits in the vicinity, in which case a date of c424-190,000 years ago is possible. Further artefacts of this date are possible within the development area, although likely sporadic and looking for them probably does not justify the resource that would be required. However, the deposits within the development site, hold potential themselves to feed into local and regional deposit models and potentially national research agendas.

*Palaeolithic research in Worcestershire: Future Work and Research Priorities* – Section 1.6 discusses the potential of the Holt Heath Member, which might be present in the very west of the proposed development site. The proposed development site also offers the

possibility of establishing its potential relationship with the Kidderminster Station Member. The interface between these two members likely occurs in the western part of the proposed development area. The Kidderminster Station Member can be traced along the whole length of the Lower Severn and beyond Stourbridge into the Stour Valley and contains new lithologies probably from glacial erosion in the Clent Hills. The Kidderminster Member dates to the same stage as the Strensham Gravels in the Avon, where megafauna including mammoth have been uncovered. The Holt Heath gravels are mapped throughout the Severn System, but they are poorly understood (i.e. they are composite members and cover a period from 109,000 to 29,000 years ago). There may be two or three (or possible more) discrete members/ sub-units which need to be separated within the Holt Heath Member. The Stourbridge beds, containing Ipswichian fauna, including Hippopotamus, were uncovered at the base of the Holt Heath in The Stour Valley. It is unknown whether this presence occurs elsewhere in the Severn system. Interbedded organic beds also occur within the Holt Heath gravels elsewhere, of particular note being Upton Warren, where Devensian faunal and palaeoenvironmental remains were recovered. The animals and plants discovered in the deposits at Upton Warren are considered of national importance.

The strategy for the site should include specialist geoarchaeological monitoring and, if necessary, recording on any exposed gravel faces and OSL dating of any decent exposures. Reason: The relationship between the Kidderminster Station Member and the Holt Heath Member may help in understanding the formation of, and subsequent changes to, the Holt Heath Member. Better understanding of the Kidderminster Station Member will feed into local and regional deposit models and potentially national research agendas

The restoration strategy should include the rebuilding of the Lea Castle boundary wall. Section 6 of the assessment states *"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."* The section of wall to be removed should be archaeologically recorded prior to its removal, as it is part of the original wall, which survives in a long unbroken section along this road. The bricks should be dismantled and stored for the duration of the project. The wall should be rebuilt at the end of the quarry life span using the original materials and bond, to look as close to the original sections as possible. This restoration work should be conditioned to ensure it occurs.

The County and the District has a responsibility to protect, either by preservation or record, cultural remains within its jurisdiction, and this is emphasised by the National Planning Policy Framework section 16, paragraph 189:

"...Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation";

and paragraph 199,

"...Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets 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. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."

In order to comply with policy, we recommend that the following three conditions should be attached to any consent:

**1) No development shall take place until a programme of archaeological work including a Written Scheme of Investigation, 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:

- a) The programme and methodology of site investigation and recording.
- b) The programme for post investigation assessment.
- c) Provision to be made for analysis of the site investigation and recording.
- d) Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e) Provision to be made for archive deposition of the analysis and records of the site investigation
- f) Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

2) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (1) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

3) Notwithstanding the submitted details, within 12 months of the commencement of the development hereby approved, a detailed restoration scheme for the site shall be submitted and approved in writing to the Minerals Planning Authority. The detailed restoration scheme shall include the reinstatement of the park boundary wall.

**Reason:** In accordance with the requirements of paragraph 199 of the National Planning Policy Framework.

**Please Note:** A fee will be charged to the applicant for the provision of a Brief (an outline scope of works) for the archaeological work required and for the checking of any responding Written Scheme of Investigation (contractors detailed method statement) and archaeological reports required to facilitate discharge of the recommended conditions.

Should planning consent be given, then the applicant or their successor in title must contact the officer below to arrange provision of the brief prior to the commencement of works. It will be the applicant's (or their successor in title) responsibility to contract an appropriate archaeological organisation to undertake the programme of works as detailed in the brief. The Planning Advisory Section of the Worcestershire Archive and Archaeology Service will offer advice on all stages of the proceedings.

Should you have any questions regarding the above please do not hesitate to contact me.

Yours sincerely



**Emma Hancox**  
Historic Environment Policy and Advisory Manager