

8. Archaeology and Heritage

Introduction

- 8.1 This chapter assesses the likely significant effects of the proposed development on the historic environment. In particular, it considers the potential effects of known and potential buried archaeological remains within the site and existing built heritage in the wider area.
- 8.2 Within this chapter, 'the Site' refers to land that falls within the application boundaries A and B, as defined in the Site Location Plans (**Figure 1.1** and **Figure 1.2**).
- 8.3 The chapter describes the methods used to assess the likely significant effects, the baseline conditions currently existing at the site and in its surroundings, the potential direct and indirect effects of the proposed development arising from the construction and the operational phase, the mitigation measures required to prevent, reduce, or offset the identified significant effects and the residual effects. It has been written by RPS.

Legislative and Planning Policy Context

Legislation

- 8.4 National legislation regarding archaeology, including scheduled monuments, is contained in the Ancient Monuments and Archaeological Areas Act 1979, amended by the National Heritage Act 1983 and 2002, and updated in April 2014.
- 8.5 Where any development may affect certain designated heritage assets, in the main built heritage assets, there is a legislative framework to ensure that any proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 8.6 The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.
- 8.7 The Court agreed with the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

8.8 Section 69(1) of the Act requires LPAs to 'determine areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and to designate them as conservation areas. Section 69(2) requires LPAs to review and, where necessary, amend those areas 'from time to time'.

8.9 For development within a conservation area Section 72 of the Act requires the decision maker to pay 'special attention [...] to the desirability of preserving or enhancing the character or appearance of that area'. The duty to give special attention is considered commensurate with that under section 66(1) to give special regard, meaning that the decision maker must give considerable importance and weight to any such harm in the planning balance. Since the study site or and part does not form land within a conservation area, Section 72 is not engaged in this case.

National Planning Policy

National Planning Policy Framework

8.10 In July 2021, the government published the revised National Planning Policy Framework (NPPF).

8.11 Chapter 16 of the NPPF, entitled 'Conserving and enhancing the historic environment' provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development;
- Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
- Conservation of England's heritage assets in a manner appropriate to their significance; and
- Recognition that heritage makes to our knowledge and understanding of the past.

8.12 Chapter 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 194 states that planning decisions should be based on the significance of the heritage asset and that level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset.

8.13 Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It goes on to state that this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

8.14 Paragraph 201 of the NPPF states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless

outweighed by public benefit, or the asset cannot reasonably be brought back in to use. Paragraph 202 goes on to state that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

- 8.15 *Heritage Assets* are defined in Annex 2 of the NPPF as: a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. They include designated heritage assets (as defined in the NPPF) and assets identified by the local planning authority during the process of decision-making or through the plan-making process.
- 8.16 Annex 2 also defines *Archaeological Interest* as a heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point.
- 8.17 A *Nationally Important Designated Heritage Asset* comprises a: World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.
- 8.18 *Significance* is defined as: The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 8.19 *Setting* is defined as: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 8.20 In short, government policy provides a framework which:
- Protects nationally important designated Heritage Assets;
 - Protects the settings of such designations;
 - In appropriate circumstances seeks adequate information (from desk-based assessment and field evaluation where necessary) to enable informed decisions;
 - Provides for the excavation and investigation of sites not significant enough to merit in-situ preservation.

National Planning Policy Guidance

- 8.21 The NPPF is supported by the National Planning Practice Guidance (NPPG). The Historic Environment Guidance section was published online on 10th April 2014 and last updated 23rd July 2019
- 8.22 The NPPF and NPPG are additionally supported by three Good Practice Advice (GPA) documents published by Historic England: GPA 1: The Historic Environment in Local Plans; GPA 2: Managing Significance in Decision-Taking in the Historic Environment (both published March 2015). The second edition of GPA3: The Setting of Heritage Assets was published in December 2017.

8.23 The NPPG reiterates that the conservation of heritage assets in a manner appropriate to their significance is a core planning principle, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation. Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available. Key elements of the guidance relate to assessing harm. An important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest, as required by paragraph 199 of the NPPF. Additionally, it is the degree of harm, rather than the scale of development, that is to be assessed. The level of 'substantial harm', referred to in paragraphs 199 to 202 of the NPPF, is considered to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF. Importantly, harm may arise from works to the asset or from development within its setting. Setting is defined as the surroundings in which an asset is experienced and may be more extensive than the curtilage. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Local Planning Policy

Central Lancashire Core Strategy (adopted July 2012)

8.24 The Central Lancashire Core Strategy contains one relevant policy, Policy 16: Heritage Assets, which seeks to:

"Protect and seek opportunities to enhance the historic environment, heritage assets and their settings by:

- a) Safeguarding heritage assets from inappropriate development that would cause harm to their significances.*
- b) Supporting development or other initiatives where they protect and enhance the local character, setting, management and historic significance of heritage assets, with particular support for initiatives that will improve any assets that are recognised as being in poor condition, or at risk.*
- c) Identifying and adopting a local list of heritage assets for each Authority."*

Adopted South Ribble Local Plan (adopted July 2015)

8.25 Part d) of Policy G17 – Design Criteria for New Development states that planning permission will be granted for new development, provided that:

"The proposal would sustain, conserve and where appropriate enhance the significance, appearance, character and setting of a heritage asset itself and the surrounding historic environment. Where a proposed development would lead to substantial harm or loss of significance of a designated heritage asset, planning permission will only be granted where it can be demonstrated that the substantial public benefits of the proposal outweigh the harm or loss to the asset."

Assessment Methodology and Significance Criteria

- 8.26 The heritage and archaeology (collectively known as the 'historic environment') baseline for this assessment has been informed by a Historic Environment Desk-Based Assessment (the 'DBA'; **Appendix 8.1**), which considers known heritage assets within the site and a surrounding study area, extending 1km from the site boundary. The size of the study area was determined using a combination of professional judgement and the nature of the proposed development. It is considered adequate for both the determination of potential off-site impacts to the setting of designated heritage assets and the collection of data to enable an assessment of the potential for currently unknown archaeological remains to be present within the site.
- 8.27 The DBA was produced using information obtained from Historic England's National Heritage List for England, the Lancashire Historic Environment Record (HER), South Ribble Borough Council (SRBC) and various on-line sources. Production of the DBA also included a site walk-over survey, undertaken on 19 July 2021. The DBA was undertaken by a full Member of the Chartered Institute for Archaeologists, in accordance with the institute's document *Standard and guidance for historic environment desk-based assessment* (2014, last updated 2017) and professional best-practice. Given the nature of the baseline data, geophysical survey or intrusive investigations are not considered necessary to inform this assessment and the DBA is considered sufficient for this purpose.
- 8.28 There are no World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields or Conservation Areas within the site or study area used for the preparation of the DBA. Whilst none are located within the site, five Grade II Listed Buildings are located within the study area, the closest being approximately 650m from the site boundary. Given the distance between the site and the Listed Buildings and taking account of the lack of inter-visibility due to the landscape and built form, there is not considered to be any potential for adverse impacts to their heritage significance as a result of the proposed development. As such, impacts to the setting of designated heritage assets have been scoped out of this assessment. Further details are provided in the DBA.
- 8.29 No non-designated assets are recorded within the study site. The HER does record the locations of three non-designated heritage assets within close proximity to the study site. All are the sites of former farmsteads and are recorded within the HER as they are shown on the 1848 first edition 6inch Ordnance Survey Map. They are recorded as non-designated assets due to their historic, rather than aesthetic, interest. The HER records indicate that all the surviving buildings associated with these former farmsteads have been extended and / or altered during the later 20th and early 21st centuries. These assets are not at risk of direct physical impacts and as such, there is no potential for adverse impacts to any associated sub-surface archaeological remains. However, given their proximity, these assets are at potential risk of adverse impacts to their settings as a result of the proposed development..

Identification of Sensitive Receptors

- 8.30 Understanding the sensitivity of the heritage assets that are at risk of impacts from the proposed development includes an assessment of the heritage values of the asset, and the contribution made by setting to those values. The sensitivity of a heritage asset can be described in terms of its heritage values (evidential, historical, communal, and aesthetic).
- 8.31 The categories listed below do not reflect a definitive level of importance ('heritage significance') or sensitivity of a heritage asset, but provisional a one based on the asset's heritage values, which can provide an analytical tool used to inform later stages of assessment and the development of appropriate mitigation. The degree of survival of a heritage asset is also taken into account in determining receptor sensitivity. Assets where there is likely to be very limited physical evidence because they have been destroyed or extensively damaged are of low or negligible sensitivity. Determination of sensitivity is a professional judgment made with reference to Historic England Good Practice Advice Note 2 and the English Heritage document Conservation Principles, Policies and Guidance (2008).

Table 8.1: Criteria for determining relative importance / heritage significance

Receptor Importance	Description
High (International/National)	Internationally and nationally important resources and designated heritage assets: Scheduled Monuments, World Heritage Sites, Registered Battlefields, Listed Buildings and Conservation Areas
Moderate (Regional)	Regionally important resources: Non-designated heritage assets and landscape features with high or moderate evidential, historical, aesthetic and/or communal values. Locally listed buildings
Low (local)	Locally important resources: Non-designated heritage assets and landscape features with low evidential, historical, aesthetic and/or communal values.
Negligible (minor)	Assets with very low or no evidential, historical, aesthetic and/ or communal values, or where remains are known to have been significantly altered or destroyed.
Unknown	Assets and structures of uncertain character, extent and/or date where the importance cannot be readily predicted.

- 8.32 The sensitivity of any currently unknown archaeological remains that may be present on the site has been extrapolated from the baseline data using professional judgement.

Characterisation of Impact

8.33 Assessing impacts to the historic environment baseline arising as a result of the proposed development will be considered using the following criteria. The descriptions of magnitude of impact, provided in the following table, relate to harm, or loss of significance, to the asset and are a professional judgement made with reference to Historic England's Good Practice Advice Note 2 and Planning Practice Guidance (2015).

Table 8.2: Criteria for determining magnitude of impact

Magnitude	Impact Description
Major	Complete removal of a heritage asset.
Moderate	Removal of a major part of a heritage asset and loss of research potential.
Minor	Removal of a heritage asset where a minor part of its total area is removed but the asset retains a significant future research potential.
Negligible	Negligible impact from changes in use, amenity or access.

Characterisation of Effect

8.34 The importance of a heritage asset can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. The former relates to any direct physical harm, including total or partial loss of the asset. Where the development only affects the setting of the asset, there is no direct physical harm. However, loss of, or change to, the asset's setting can (where setting contributes to the importance of the asset) result in a reduced ability to experience and understand the asset and, therefore, have an adverse effect on the asset's importance.

8.35 Two types of impact are considered in this assessment with regard to the characterisation of effects, during both the construction and operational phases of the proposed development. The first type of impacts are direct physical impacts to heritage assets as a result of the proposed development. These direct impacts take the form of disturbance to, or removal of in part or whole, currently unknown archaeological remains. They may also take the form of changes to the fabric or composition of above ground heritage assets within the site, such as historic buildings and landscape features. Direct physical impacts would only occur during the construction phase and would be permanent. No direct physical impacts will occur outside of the site.

8.36 The second type of impacts are impacts to the setting of heritage assets as a result of the proposed development Scheme. Impacts to the setting of heritage assets usually take the form of changes to views to and from the assets but may also take the form of changes in the way the asset is experienced, such as changes due to increases in noise or night-time light levels, or the loss of a historical association. Settings impacts can occur

during both the construction phase and the operation phase of the proposed development. Those arising during the construction phase may be temporary, those occurring during the operational phase would be permanent.

Significance Criteria

8.37 Professional judgement is applied in determining the overall significance of effect within the broad categories identified by the below matrix. The assessment will take into account the relative importance of the asset, the contribution made by setting to that importance, and the predicted magnitude of impact on that importance that would result from the proposed development. This determines the overall significance of effect.

Table 8.3 Criteria for determining significance of effect

Magnitude of impact	Sensitivity of receptors			
	High	Moderate	Low	Negligible
Major	Major	Moderate	Moderate	Minor
Moderate	Moderate	Moderate	Minor	Neutral
Minor	Moderate	Minor	Neutral	Neutral
Negligible	Minor	Neutral	Neutral	Neutral

8.38 For the purpose of this assessment, major and moderate adverse effects will be considered as significant effects in EIA terms. Effects of lesser value are not considered significant effects in EIA terms. The nature of an effect can be classified as adverse, neutral, or beneficial:

Assumptions/Limitations

8.39 This chapter has been compiled using heritage asset data obtained from third party sources and the prediction of effects is based on the accuracy of that data. Whilst the data from these sources is generally valid, there can be instances where heritage asset data is mislabelled, located in the wrong geographical location or omitted altogether.

8.40 Whilst this assessment is based on data obtained in July 2021, the data sources used for this chapter are updated as new heritage assets are identified or data on existing ones refined. Despite the potential for additional heritage assets to be identified, it is unlikely that the prediction of the effects will change.

8.41 The sensitivity of any currently unknown archaeological remains that may be present on the site has been extrapolated from current evidence using professional judgement.

Consultation

- 8.42 Data for the site and surrounding study area has been obtained from the Lancashire HER, hosted by the Lancashire County Archaeological Service (LCAS), who also provide archaeological advice to SRBC. It is expected that SRBC will consult with LCAS during the planning application process.

Baseline Conditions

Designated Heritage Assets

- 8.43 There are no Scheduled Monuments, Registered Battlefields, Registered Parks and Gardens or Conservation Areas recorded within the site or study area. Whilst no Listed Buildings are recorded within the site itself, five Grade II Listed Buildings are recorded within the study area (**Figure 8.1**). The closest to the site is Nutters Plat Farmhouse, located approximately 650m to the west. There is no inter-visibility between the site and any of the Listed Buildings and the site does contribute to the heritage significance of the assets.

Non-Designated Heritage Assets

- 8.44 No non-designated heritage assets are recorded within the site. The HER does record the locations of three non-designated heritage assets within close proximity the site (**Figure 8.2**). All are the sites of former farmsteads and are recorded within the HER as they are shown on the 1848 first edition 6inch Ordnance Survey map. The HER records the locations of a further 50 non-designated heritage assets within the study area. All are either Post Medieval or Modern and most relate to former or extant buildings and structures. These extant and former structures range in date from a 17th century house (PRN1451) to mid-20th century gasholders (PRN39167).

Chronological Summary

Prehistoric (900,000 BC to AD 43)

- 8.45 No Prehistoric heritage assets are recorded within the site or study area. There is also little evidence for the Prehistoric period within the wider landscape outside of the study area. This probably reflects a preference for the location of settlement sites during much of the Prehistoric period within North West England on higher areas with better drainage, often overlooking rivers. Any activities that took place within the lower, less well drained areas would have been those that left no discernible trace in the archaeological record, such as hunting and the gathering of other wild foods and natural materials. Whilst there are a few notable examples of later prehistoric lowland settlement within the region, such as Brook House Farm in Halewood, Merseyside and Dutton's Farm in Lathom, Lancashire, these sites area considered as somewhat exceptional.
- 8.46 There are no Post-Medieval or Modern heritage assets recorded within the site. There are three Post-Medieval non-designated heritage assets recorded within close proximity to the site, all of which relate to the sites of former farmsteads that appear on the first edition 6inch Ordnance Survey map published in 1848. Balshaw Farm and Crook's Farm (PRN39395) are located either side of Bee Lane. Whilst covered by a single HER reference

number, the asset represents two separate farmsteads, the surviving buildings of which have been altered or extended during the later 20th and / or early 21st century.

- 8.47 Proctor's Farm (PRN39396) is located on the western side of Moss Lane. The original farmhouse was demolished and rebuilt during the later 20th century, whilst the barn has been converted to residential use. Holme Farm (PRN39397) is located on the eastern side of Moss Lane and the farmhouse is recorded as being heavily altered and extended since its original construction, which was confirmed by the site walkover survey.
- 8.48 In addition to the three Post Medieval non-designated heritage assets recorded within close proximity to the study site, a further 50 Post Medieval and Modern non-designated heritage assets are recorded within the study area. Most of these assets relate to former or extant buildings and structures. These extant and former structures range in date from a 17th century house (PRN1451) to mid-20th century gasholders (PRN39167). The remaining non-designated heritage assets relate to a Post-Medieval or Modern mill pond (PRN6673), two Modern railway lines (PRN39372 and PRN39984) and a Modern canal tramroad (PRN6696). Whilst relevant to the historic development of the study area, none of these heritage assets are of relevance to this assessment as they are neither sensitive to changes in their setting as a result of the proposed development or indicative of the archaeological potential of the site.
- 8.49 The earliest maps to show the study site in any detail are the 1839 Farington and Penwortham tithe maps, which show an identical layout of fields to that shown on the 1848 Ordnance Survey map. None of the field names listed within the tithe schedules are suggestive of archaeological potential. The schedules indicate mixed farming with both arable and pasture listed. The roads and tracks running north-south and east west across the study site are shown. Subsequent Ordnance Survey maps show that the site has remained rural in character with low levels of development.

Archaeological Potential

- 8.50 Based on the available information there is considered to be low potential for currently unknown archaeological evidence of all periods to be present within the site. However, it is acknowledged that the lack of evidence may reflect the fact that no previous archaeological investigations have been undertaken within the study site or its vicinity.

Importance of Heritage Assets

- 8.51 The five Listed buildings identified outside of the site but within the study area are considered to be of high importance, given their Grade II Listed status. All of the non-designated heritage assets identified within the study area are considered to be of low to moderate importance based on their historic and evidential value. The importance of the three non-designated heritage assets recorded within close proximity to the site is limited to their historic and evidential value and they are considered to be of low importance.

Embedded Mitigation

- 8.52 No embedded mitigation measures are of relevance to this assessment.

Assessment of Likely Significant Effects

Demolition and Construction

- 8.53 No impacts to known heritage assets or currently unknown archaeological remains are anticipated during demolition works.
- 8.54 The three non-designated heritage assets within close proximity to the site (Balshaw Farm and Crook's Farm, Proctor's Farm and Home Farm) are at risk of adverse impacts to their setting during the construction phase of the proposed development. The assets' setting will be changed from a rural landscape to a construction site landscape. The level of impact is anticipated to be moderate. Given the low importance of the assets, the significance of effect is predicted to be **minor adverse** for the duration of the construction works within the vicinity of the assets at the local level.
- 8.55 Any currently unknown archaeological remains located within the site may be truncated or removed as a result of the construction of the proposed development. The level of impact to any currently unknown archaeological remains is anticipated to be moderate to major. Given the potential low value of any currently unknown archaeological remains, the significance of effect is predicted to be permanent **minor to moderate adverse** at the local level.

Completed Development

- 8.56 The three non-designated heritage assets within close proximity to the site (Balshaw Farm and Crook's Farm, Proctor's Farm and Home Farm) are at risk of adverse impacts to their setting during the operation phase of the proposed development. The assets' setting will be changed from a rural landscape to a developed residential landscape. The level of impact is anticipated to be moderate. Given the low importance of the assets, the significance of effect is predicted to be permanent **minor adverse** at the local level.
- 8.57 No impacts to currently unknown archaeological remains are anticipated during the operational phase of the proposed development.

Additional Mitigation / Enhancement Measures

- 8.58 This section describes the measures which are required to mitigate any significant environmental effects with regards to archaeology and heritage.

Demolition and Construction

- 8.59 A phased approach would be adopted to mitigate any potential impacts during the construction phase to currently unknown archaeological remains that may be located within the site. The first phase would consist of archaeological evaluation via geophysical survey and trial trenching within areas of the site subject to construction works. The scope of these investigations would be agreed with SRBC and LCAS. This would identify and would characterise the nature and extent of any surviving archaeological remains. If required, further mitigation would consist of archaeological excavation and recording prior to construction works commencing and/or archaeological watching brief during construction works.
- 8.1 All mitigation would be undertaken in accordance with a Written Scheme of Investigation (WSI) approved by SRBC.

Completed Development

- 8.2 No additional mitigation is considered to be required during the operational phase of the proposed development.

Likely Residual Effects of the Development and their Significance

- 8.3 The residual effects with regard to impacts to the setting of (Balshaw Farm and Crook's Farm, Proctor's Farm and Home Farm) is predicted to be **minor adverse** at the local level. These effects will be temporary during the construction phase and permanent during the operational phase of the proposed development. Following mitigation, the residual effect on any currently unknown archaeological remains within the site is predicted to be **neutral**.

Table 8.4: Residual Effects Summary

Description of Effect	Potential effect including significance	Mitigation	Residual Effect including significance
Construction and Demolition			
Impacts to the setting of Balshaw Farm and Crook's Farm, Proctor's Farm and Home Farm	Minor adverse – temporary at the local level	N/A	Minor adverse– temporary at the local level
Impacts to currently unknown archaeological	Minor to moderate adverse – permanent at the local level	Phased programme of archaeological investigations	Neutral

Description of Effect	Potential effect including significance	Mitigation	Residual Effect including significance
remains			
Completed Development			
Impacts to the setting of Balshaw Farm and Crook's Farm, Proctor's Farm and Home Farm	Minor adverse – permanent at the local level	N/A	Minor adverse – permanent at the local level

Conclusions

8.4 This assessment has collated historic environment baseline data for the site and a surrounding study area extending 1km from the site boundary. Five designated heritage assets, all Grade II Listed buildings, have been identified within the study area, the closest being 650m to the east. As there is no inter-visibility between the site and any of these assets, impacts to their settings has been scope out of this assessment. Whilst no non-designated heritage assets are recorded within the site itself, three have been identified within close proximity to the site, all of which relate to the sites of former farmsteads that appear on the first edition 6inch Ordnance Survey map published in 1848 (Balshaw Farm and Crook's Farm, Proctor's Farm and Home Farm). These assets are at potential risk of a change to their setting as a result of the proposed development. No mitigation is proposed, and the residual effect is predicted to be **minor adverse** at the local level. The effects would be temporary for the construction phase and permanent for the operational phase. Any direct physical impacts to currently unknown archaeological remains located within the site can be mitigated through a phased programme of archaeological investigation and the residual effects are predicted to be **neutral**.

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