From:	Stephen Baker (Economy Transport and Environment) <stephen.baker@derbyshire.gov.uk></stephen.baker@derbyshire.gov.uk>
Sent:	22 October 2018 12:21
To:	Planning (HPBC)
Cc:	Haywood, Ben
Subject:	HPK/2018/0462 Town Yard, Market Street, Buxton. Outline Permission with details of access (all other matters reserved) for Demolition of existing buildings and redevelopment of the site for up to 40 dwellings and associated car parking etc - archaeology

Categories:

## Dear Ben,

Thank you for consulting on the above planning application.

The proposal site lies within the Buxton Area of Archaeological Interest as defined in the High Peak Local Plan. This defines the likely area of activity associated with the Roman town of *Aquae Arnemetiae* and where below-ground remains of Roman date may be expected. In relation to development proposal within the AAI Policy EQ7 of the local plan reads as follows:

Within the Buxton Area of Archaeological Interest development proposals should be informed by desk-based assessment / field evaluation as appropriate to assess the potential for impacts on Roman archaeology.

While the current proposals include a 'heritage statement' and this document recognises that the site falls within the AAI, the submission does not come up to the standard of 'archaeological desk-based assessment' as defined by the Chartered Institute for Archaeologists. In particular, there is no historic map regression to allow the mapping of archaeological potential with the site and no consideration of potential for medieval and post-medieval archaeology within the site. Given the size of the site within the AAI and its generally open character there is also a strong case for archaeological field evaluation to be carried out.

I therefore recommend that the application as currently presented does not meet the information requirement at NPPF para 189/190, and Local Plan Policy EQ7 in relation to the AAI in Buxton. In the first instance the heritage study should be upgraded to conform to the requirements for archaeological desk-based assessment. Reconsultation will then be needed in the light of these results to advise on whether archaeological field evaluation is also appropriate.

## Regards

## Steve Baker MA MCIFA | Archaeologist

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