

**From:** Steve Baker (Place) <[Steve.Baker@derbyshire.gov.uk](mailto:Steve.Baker@derbyshire.gov.uk)>  
**Sent:** Friday, September 1, 2023 2:54 PM  
**To:** Steven Gunn-Russell <[Stevengr@whitepeakplanning.co.uk](mailto:Stevengr@whitepeakplanning.co.uk)>  
**Cc:** Chris Turner <[chris@whitepeakplanning.co.uk](mailto:chris@whitepeakplanning.co.uk)>  
**Subject:** RE: Dinting Vale HPK/2022/0456

Dear Steven,

Thank you for re-consulting on the above planning application, following the submission of an expanded geophysical survey in relation to archaeological remains within the site.

I advised previously that archaeological evaluation of the site (geophysics in the first instance supplemented by trial trenching if appropriate), should be carried out in order to inform on archaeological significance and impact in pursuance of NPPF para 194. The known archaeological interest in the site is the line of the Brough to Melandra Roman road which is believed to cross the site. It has been suggested that there may be two separate phases of Roman road - i.e. two separate lines – possibly on and to the north of the existing track, although a line to the south cannot be ruled out.

In scoping the geophysics methodology I highlighted the unreliability of magnetometer survey on Roman roads – for example a well-preserved Roman road at Moor Lane, Kirk Langley was completely missed by geophysics but turned out to be very well-preserved on evaluation trenching, and has now been scheduled by Historic England. The applicant's contractors proposed to do some transects with ground penetrating radar (GPR) to supplement the background magnetometer survey.

Uncleared vegetation severely constrained the initial magnetometer survey to about a third of the site area. GPR transects were carried out across the track and in the area immediately north, but again the length of these was limited by vegetation. Following reconsultation and the clearance of some vegetation, an additional area in the southern part of the site was surveyed by magnetometer, which extends the magnetometer coverage south of the track to a more acceptable level.

The combined geophysical work did not identify any signals which suggested the presence of a well-preserved Roman road within the areas surveyed. These results must however be tempered by an appreciation of the limited areas covered – particularly in the northern part of the site which still remains mostly unsurveyed – and an understanding of the limitations of magnetometer survey in detecting Roman road archaeology (see above). There is a linear signal in the southern part of the site which is parallel to the track, and this – and other signals – will need testing by trial trenching. In addition, the archaeologists observed stone footings adjacent to the track in one area – this is obviously therefore an area of interest although the archaeologists felt these were unlikely to be related to Roman activity.

I appreciate that the applicant has attempted to reconcile a number of competing constraints in assembling the geophysical work thus far. I have spoken to Derbyshire Wildlife Trust and understand that there is biodiversity/habitat significance in parts of the site which is difficult to reconcile with archaeological evaluation trenches.

While noting the geophysical survey carried out thus far I do not however feel that the assessment of archaeological significance yet meets the 'just enough' of NPPF para 194. Not enough of the site has been surveyed, and no trial trenching has yet been carried out to test the results. I therefore advise on balance that the information submitted does not satisfy NPPF para 194, and I therefore object to the proposals on this basis.

To overcome this objection it will be necessary to carry out some trial trenching on the site to test and expand the geophysical results, and to establish significance in the northern part of the site. The quantity of trenching could be reduced by expanding the GPR coverage further north of the track. Any trenching would need to be carried out in close consultation with DWT to ensure a joined-up approach to ecology and archaeology.

As this is a sensitive process and not quickly achieved, I suggest that the applicant would be best advised to withdraw the application or accept an extension to the determination period, in order to allow the relevant surveys to take place.

Regards

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