

[REDACTED]

From: Steve Baker (Place) [REDACTED]
Sent: 24 April 2026 14:54
To: Laura Holland; James Stannard
Cc: Rachel Robinson; Planning (HPBC)
Subject: RE: HPK/2026/0134 - Buxton Natural Mineral Baths

[REDACTED]

Hi Laura,

Thanks for this. I am happy in principle with the proposal to 'pre-approve' the WSI and change the condition wording to compliance. However there are a few issues with the WSI as it stands:

- 2.1.8 the contractor needs to be identified in order for the WSI to be approved, otherwise we will revert to the pre-commencement condition as previously recommended. Please insert details here and (later) names of proposed specialists and other responsible individuals
- Your round-up of previous archaeological events is a contradictory in places – for example at 4.4.5 you quote the HER entry saying that “The site of the bath is given as 6 yards from the then 'Bathroom' which is probably now represented by the Natural Baths” but then at 4.4.6 “Today, the 'site' of the probable Roman baths is covered by the Georgian Crescent building”. 4.4.3 “construction of the Natural Mineral Baths is likely to have removed any traces of previous archaeological activity” is demonstrably false given the Roman finds beneath the pool floor in 1975 (4.5.4). You might therefore want to note these contradictions (at least) – I think we could probably conclude that the Roman ‘baths’ (whatever they were) were located on or close to the site of the Natural Baths given the presumed use of the same natural springs, and that although there will undoubtedly have been a great deal of 18th century truncation, there is still some potential for pockets of survival as demonstrated in 1975.
- The methodology at 6.1.4 ff looks to be a standard monitoring methodology but some of the detail seems unlikely given the work is being carried out within the Natural Baths in fairly close confines. Is it really proposed to use a mechanical excavator fitted with a flat-bladed bucket in here? Can you review this section please with details of how the contractor actually intends to dig these trenches? There should be provision for the excavation to revert to hand digging by the archaeologists if the trenches are into material that is potentially archaeological – i.e. not either modern hardstanding/rubble or natural clay/rock.
- 7.2.4 you need to identify Buxton Museum as the receiving museum for any archive deemed to merit museum deposition, and should reference and provide to follow their deposition guidelines (I can provide a copy if you don't have them). Note the requirements for digital archiving (ADS) as per the guidelines, and that 'negative' results do not need archiving (report to HER and OASIS only).

If you can tweak accordingly and reissue for approval I'll be able to recommend a revised condition wording to James. [REDACTED] please note therefore that the WSI is not approved at the current time and that previous comments still apply – once we have an approved document I can recommend revised condition in relation to archaeology.

Best wishes

Steve Baker MA MCIfA | **Archaeologist** [REDACTED]
[REDACTED] [REDACTED]

Visit [Derbyshire Historic Environment Record](#) | Follow us on [Bluesky](#) | Read [ACID magazine](#)

CONTROLLED