

Rural County (Environmental Advice)

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FAO Arne Swithenbank

Development Services
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Please ask for: Mr. Shane Kelleher

Our Ref: HoEC/EC3210/SM/SK/CST8731 **Your Ref:** SMD/2022/0343

25 August 2022

Dear Mr Swithenbank,

TOTMONSLOW FARM, DRAYCOTT ROAD, TOTMONSLOW, UPPER TEAN

Thank you for your consultation request regarding the planning application for the development of a solar farm with ancillary infrastructure, security fence, access, landscaping and continued agriculture, to generate power to feed into the local distribution network at the above site. This letter outlines the response of Staffordshire County Council's Historic Environment Team regarding the historic environment implications of the proposals.

Archaeological/Historic Environment Interest

The application has been reviewed against the information held by the Staffordshire Historic Environment Record (HER), and a comprehensive Cultural Heritage Baseline and Impact Assessment (CHA), which has been informed by a geophysical survey (GS - as requested in pre-app advice), produced in support of the application. The CHA and GS report, which have been produced in line with the relevant Chartered Institute for Archaeologists' Standard and Guidance, have provided a useful understanding of the developmental history and archaeological potential of the application site. The CHA (submitted along with the submitted Landscape and Visual Impact Assessment) has also assessed the potential impact of the proposals on nearby designated heritage assets such

as listed buildings and scheduled monuments, whilst also assessing the potential cumulative impact of the proposals on the historic agricultural landscape.

In general, the conclusions of the CHA in terms of the impact of the proposals on the historic environment are supported, although I am happy to defer to your Conservation Officer colleague in relation to the impact on listed buildings. The CHA and GS have concluded that there is some, albeit low, archaeological potential/interest in the application site for all periods, with an increased likelihood of groundworks in the area encountering medieval and later archaeological features, particular of an agricultural, or in the case of the more recent periods, industrial nature (associated with an adjacent brickworks). They also highlight the presence of extant earthworks representing medieval ridge and furrow (i.e. evidence of historic ploughing) within parts of the application site, and note that the level of truncation of archaeological earthworks (and by extension any previously unknown below ground archaeological features within the site) is likely to be less than arable due to its current use as pasture.

Archaeological Recommendations

Taking the conclusions of the CHA and GS into account with regards to the archaeological potential of the site, and considering the potential impact of the scheme, it is advised that, whilst I do not wish to raise any archaeological objections to the proposed development, should permission be granted, a further stage of archaeological evaluation, in the form of archaeological trial trenching should be carried out across the site. This would be appropriate given the presence of ridge and furrow across a sizeable proportion of the site (ridge and furrow can serve to mask earlier sites), the scale of the scheme, the relative lack of intrusive archaeological works in the wider area, and the limitations of magnetometry as a geophysical survey in such geological conditions. This trial trenching should be undertaken in advance of any groundworks in order for the results to inform the need for further staged works and to inform the scale and extent of these further archaeological works (such as excavation, watching brief etc.), and indeed assist the applicant in developing alternative design or installation options, should the results deem it necessary.

In addition, given the presence of earthworks relating to medieval ridge and furrow within the application site, it is recommended that a Level 2 earthwork survey (as outlined in Historic England's Understanding the Archaeology of

Landscapes A Guide to Good Recording Practice (Second Edition), 2007) should be carried out in order to record these and any less visible associated features such as plough headlands or trackways) in advance of the proposed development.

The above approach, i.e. trial trenching, is supported by NPPF (2021) para 194, while any works which stem from the evaluation and the earthwork survey are supported by NPPF (2021) para 205.

All archaeological works must be undertaken by an appropriately experienced archaeological organisation (with suitably experienced personnel) or historic environment professional/ archaeologist working to the requirements of a brief prepared by this office (or approved Written Scheme of Investigation (WSI), the Chartered Institute for Archaeologists (CIfA) Code of Conduct (or equivalent) and to a level commensurate with the relevant CIfA Standards and Guidance.

Suggested Condition

The above works* could be most satisfactorily secured via a condition attached to any planning permission for the scheme. This condition should read:

"A) The archaeological site work shall be implemented in full in accordance with the approved written scheme of archaeological investigation submitted in support of the application

B) The development shall not be occupied until the site investigation and post-fieldwork assessment has been completed in accordance with the approved written scheme of archaeological investigation and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured."

Should you have any queries regarding the content of this letter, please don't hesitate to contact me.

Yours sincerely,

Shane Kelleher

Shane Kelleher

County Archaeologist

*Applicant please note that in May 2018 Staffordshire County Council's Historic Environment Team, archaeological advisors to Staffordshire Moorlands District Council, introduced a charged-for curatorial service for planning applications with archaeological conditions. Our curatorial service will be charged at a single fee per application and may include: production of a brief/specification (where deemed necessary), review and validation of any submitted written schemes of investigation, monitoring visits (if deemed necessary), review and validation of any submitted reports, liaison with local planning authority and approval of discharge of conditions. Fees are based on the size of the development. The production of a brief/specification to inform the tendering process and additional monitoring visits can also be purchased separately. These fees should be paid in advance by your appointed archaeological/historic environment organisation/contractor (who should include them in their tender quote) or by the applicant/agent using our online payment system. More details can be found here:

<https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Advice-and-guidance.aspx>