

Rural County (Environmental Advice)

Staffordshire County Council
1 Staffordshire Place
Tipping Street
Stafford
ST16 2DH

FAO Declan Cleary

Development Services
Highpeak Borough Council
and Staffordshire Moorlands District Council

Telephone:

Email:

Please ask for: Mr. Shane Kelleher

Our Ref: HoEC/EC3210/SM/SK/CST9534 **Your Ref:** SMD/2023/0594

07 December 2023

Dear Mr Cleary,

LAND AT BLYTHE HOUSE FARM, DRAYCOTT IN THE MOORS

Thank you for your consultation request regarding the planning application for the installation of a solar array, substation and associated works forming an extension to Blythe Solar Farm 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 Historic Environment Desk-based Assessment (HEDBA) and Geophysical Survey (GS) report produced in support of the application. The HEDBA and GS reports, 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 HEDBA (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.

The HEDBA and GS have concluded that there is limited archaeological potential/interest in the application site, and coupled with the small and localised construction impacts associated with the scheme, the author of the HEDBA notes that archaeological monitoring during key construction works may be sufficient to identify and record any archaeological remains. These conclusions with regards to the archaeological potential and proposed archaeological mitigation are generally supported.

The HEDBA also assesses the potential impact of the proposals on the setting of a number of designated heritage assets, including the Grade II listed Blythe House and the Grade II listed and scheduled Paynsley Hall, and has assessed this in line with the guidance provided in Historic England's 'The Setting of Heritage Assets' Good Practice Advice in Planning 3 (2017). The assessment seems appropriately robust and the conclusions are generally supportable, particularly when considered in concert with the proposed additional planting and enhancement of existing natural coverage. However, I am happy to defer to the knowledge and experience of your conservation advisors should they be of an alternative view.

Archaeological Recommendations

Taking the above archaeological potential into account and considering the scale of below ground impact required by the proposed scheme, it is advised, should permission be granted, that an archaeological watching brief be maintained during key construction works (details of which to be agreed with the applicant/their archaeological advisors in due course) associated with the scheme.

This approach is in line with NPPF paragraph 194, which requires applicants to describe the significance of any heritage assets and the potential impact of any proposed development upon them. It is also supported by NPPF paragraph 205 which states that '...they [Local Planning Authorities] should also require developers to record and advance understanding of significance of any heritage asset to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'.

The archaeological monitoring should be undertaken by a suitably experienced archaeologist(s) working to the Chartered Institute for Archaeologists 'Code of Conduct' and the relevant standards and guidance (2014).

Suggested Archaeological Condition

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

'Prior to the commencement of the development hereby permitted, a written scheme of archaeological investigation ('the Scheme') shall be submitted for the written approval of the District Planning Authority. The Scheme shall provide details of the programme of archaeological works to be carried out within the site, including post-excavation reporting and appropriate publication and interpretation. The Scheme shall thereafter be implemented in full in accordance with the approved details'.

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

Yours sincerely,

Shane Kelleher

County Archaeologist

*Applicant please note that in May 2018 Staffordshire County Council's Historic Environment Team, archaeological advisors Staffordshire Moorlands District Council, introduced a charged-for curatorial service for planning applications with archaeological conditions. However, given the small-scale nature of the proposals I am happy to waive these fees- although should a site visit be deemed necessary (depending on the results of the watching brief) we would need to recover the costs of this. More details about these fees can be found here:

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