

Rural County (Environmental Advice)

Staffordshire County Council
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Tipping Street
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FAO Declan Cleary

Development Services
Highpeak Borough Council
and Staffordshire Moorlands District Council

Telephone: (01785) 276580

Email:

Please ask for: Mr. Shane Kelleher

Our Ref: HoEC/EC3210/SM/SK/CST9739 **Your Ref:** SMD/2024/0055

09 May 2024

Dear Mr Cleary,

LAND SOUTH OF CELLARHEAD SUBSTATION, AND WEST OF ROWNALL ROAD, WETLEY ROCKS, STAFFORDSHIRE

Thank you for your consultation request regarding the planning application for the erection of a flexible energy facility, associated works, landscaping and habitat creation, 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 associated datasets, and a comprehensive Historic Environment Desk-based Assessment (HEDBA). The HEDBA, which has been informed by a full HER search and has been produced in line with the relevant Chartered Institute for Archaeologists' Standard and Guidance, has provided a useful understanding of the developmental history and archaeological potential of the application site. The HEDBA (along with the submitted Landscape and Visual Assessment) has also assessed the potential

impact of the proposals on nearby designated heritage assets such as listed buildings and scheduled monuments.

In general, the conclusions of the HEDBA 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 HEDBA has concluded that there is some, albeit predominantly low, archaeological potential/interest in the application site. This is generally supported, however, it must be noted that there has been a lack of previous fieldwork in the wider area to further inform this, and to add further context to this, the Staffordshire Moorland Historic Environment Assessment (CWWHECZ 5 Cheddleton, Wetley Rocks and Werrington – report available on the County Council website or via the HER), which covers part of the application site, concludes that there is a moderate potential for below ground archaeological remains to survive within this character zone.

Archaeological Recommendations

Taking the above into account with regards to the archaeological potential of the site, and considering the potential impact of the scheme, and indeed the lack of previous archaeological work in the wider area, 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 a staged evaluation comprising a geophysical survey followed by archaeological trial trenching (the need for and scope of this to be determined following the geophys survey) should be carried out across the site. This archaeological work 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 (unlikely).

The above approach, i.e. geophysical survey and trial trenching, is supported by NPPF (2023) para 200, while any works which stem from the evaluation and the are supported by NPPF (2023) para 211.

All archaeological works must be undertaken by an appropriately experienced archaeological organisation (with suitably experienced personnel) or historic environment professional/ archaeologist working to an approved Written Scheme of Investigation (WSI), which has been informed by the relevant SCCHET Model Brief, 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) 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 Local 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.

B) The archaeological site work shall thereafter be implemented in full in accordance with the written scheme of archaeological investigation approved under condition (A).

C) The development shall not be occupied until the site investigation and post-excavation assessment has been completed in accordance with the written scheme of archaeological investigation approved under condition (A) 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

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>