

Rural County (Environmental Advice)

Staffordshire County Council
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FAO Declan Cleary

Development Services
High Peak Borough Council
and Staffordshire Moorlands District Council

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Please ask for: Mr. Shane Kelleher

Our Ref: HoEC/EC3210/SM/SK/CST9638 **Your Ref:** SMD/2024/0019

29 February 2024

Dear Mr Cleary,

**LAND AT NEWFIELDS FARM, ROWNALL ROAD, WETLEY ROCKS,
STAFFORDSHIRE**

Thank you for your consultation request regarding the planning application for the development of a Battery Energy Storage System (BESS) with ancillary infrastructure, security fence, access, landscaping and biodiversity enhancements, to provide balancing services to the local electricity grid, 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 Built Heritage and Archaeological Assessment (BHAA) submitted in support of the application. The BHAA, 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,

and its conclusions regarding the archaeological potential (low but the absence of previous archaeological investigations nearby makes determining the archaeological potential of the site difficult) of the site are generally supported, although I will note that the presence of the stream adjacent to the west of the site does increase this potential as such watercourses have been found, elsewhere in the county, to be the focus of late prehistoric settlement and/or activity. 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 whilst not covering the application site, includes the area less than 700m to the south and east of the application site. This concludes that there is a moderate potential for below ground archaeological remains to survive within this character zone.

With regards to the potential impact of the proposals on nearby designated heritage assets I am happy to defer to your Conservation Officer colleague.

Archaeological Recommendations

Taking the conclusions of the BHAA 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.).

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 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 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) 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

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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>