

Rural County (Environmental Advice)

Staffordshire County Council
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Tipping Street
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ST16 2DH

FAO Chris Johnston

C/O Planning Support
Staffordshire Moorlands District Council
Moorlands House
Leek
Staffordshire
ST13 6HQ

03 September 2025

Our Ref: HoEC/EC3210/SM/LP/CST10432

Your Ref: SMD/2025/0354

Dear Chris,

LAND OFF LEEK ROAD, WERRINGTON

Thank you for your consultation request regarding the proposed erection of a 300 MW battery energy storage system (BESS) 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

This application has been reviewed against the information held by the Staffordshire Historic Environment Record (HER), historic mapping and the Archaeological Desk-based Assessment (ADBA) and Built Heritage Statement (BHS) submitted in support of the application. The proposed development site is located within an area which has been subject to little previous archaeological investigation, hence the archaeological potential of the site is largely unknown; in fact, the HER contains only two archaeological events within a 1km radius of the site, comprising a building recording and a survey, neither of which contain information which can inform on the archaeological potential of the site. The site is partially located within the southern extent of the Cheddleton, Wetley Rocks and Werrington Historic Environment Character Zone 15 (HECZ15). HECZ15 is considered to contain a low potential for below-ground archaeological remains; however, the assessment notes that there is a lack of research within this area, which limits our understanding of the potential for archaeological remains to survive, and the low potential is likely as much to do with the low

levels of development led prospection as it is with any actual sparsity of archaeological remains in the area.

The route of the short-lived 19th century Consall Plateway runs through the northern field of the site. This was constructed to assist the transportation of burnt lime from Consall to Rangemoor but had closed by 1849. However, no above-ground remains of the plateway survive on site and it is highly doubtful that any sub-surface remains survive. The northern field that contains the plateway is to remain undeveloped, and therefore, if any remains do survive, they will not be impacted.

The ADBA has identified that the groundworks involved in the proposed development, such as levelling, will have a high impact on any archaeological remains. These impacts would result in damage to or loss of any buried archaeological resource that may be present within the site, thus resulting in the total or partial loss of their significance.

Listed structures are located to the north of the site, at Cellarhead. The HEDBA has assessed the potential impact of the proposed development on the setting of these designated heritage assets, and I am happy to defer to your Conservation Officer colleague with regards to the efficacy of the assessment and the conclusions reached.

The ADBA has identified that elements of the site's perimeter and two lengths of hedging within the site qualify as 'important hedgerows' as per The Hedgerow Regulations 1997. With this in mind, the retention of historic field boundaries is encouraged and welcomed.

Recommendations

Whilst I do not wish to raise any archaeology-related objections to the application, taking the above into account with regards to the uncertain archaeological potential of the site, and also the potential below-ground impact of the proposed development, it is advised that, should permission be granted, a **staged archaeological evaluation** be conducted in order to determine the presence and significance of any surviving archaeological remains and to assess the need for and scope of further archaeological mitigation (such as excavation, watching brief etc.). The archaeological evaluation must be undertaken sufficiently in advance of construction so that, should further archaeological mitigation be required, it can be designed and fully implemented. This staged archaeological evaluation should comprise a geophysical survey followed by targeted trial trenching, the scale and location of which should be informed by

the geophysical survey and any ground investigation works carried out associated with the proposed development or previously carried out and available.

Policy and Best Practice Context

This approach, i.e. archaeological evaluation, is supported by NPPF (2024) para 207 while any works which stem from the evaluation are supported by NPPF par 218. The archaeological works should be undertaken by an appropriately experienced archaeologist working to an approved Project Design that has been informed by SCCHE's Model Briefs for geophysical survey and trial trenching (available [Staffordshire County Council's County Archaeology Standard](#)), 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 work* would most appropriately be secured via a condition being attached to any permission issued. This condition should state:

A) "Prior to the commencement of the development hereby permitted, a Project Design shall be submitted for the written approval of the Local Planning Authority. The Project Design shall provide details of the programme of archaeological works to be carried out within the site, including post-fieldwork reporting and appropriate publication.

B) The archaeological site work shall thereafter be implemented in full in accordance with the Project Design approved under condition (A).

C) The development shall not be occupied until the site investigation and post-fieldwork assessment has been completed in accordance with the Project Design 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,

Environment Specialist (Archaeology)

*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 anything that will enable us to recommend 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>