

Environment & Countryside

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FAO Chris Johnston

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27 November 2025

Our Ref: HoEC/EC3210/SM/SK/CST10561

Your Ref: 25/40571/FUL

Dear Chris,

NEW BUILDINGS FARM, SANDON ROAD, SHARPLEY HEATH, STONE

Thank you for your consultation request regarding the application for the Solar farm with ancillary infrastructure, security fence, access, landscaping and designed to allow continued agriculture 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.

Historic Environment/Archaeological Interest

The application has been reviewed against the information held by the Staffordshire Historic Environment Record (SHER) and associated datasets such as historical mapping, LiDAR, and the documents submitted in support of the application, including a Cultural Heritage Baseline & Impact Assessment (CHBIA) and a Landscape Visual Impact Assessment (LVIA). The conclusions of the CHBIA, which was produced following detailed discussions between this office and the applicant's archaeological advisors, and which is suitably comprehensive and has been produced in line with the relevant industry standard and guidance, and supported by a geophysical survey (GS – in this case magnetometry), with regards to the below ground archaeological resource, are generally supported. This notes that the baseline archaeological potential of the application site is generally low, albeit with a likely heightened potential for the medieval (particularly in association with the medieval moated site in the southern part of

the application site) period onwards. This understanding must be caveated with an acknowledgement that the results of magnetometry can be variable in areas where the underlying geology is Mercian Mudstone (such as the application site); there has been a relative lack of previous intrusive archaeological works in the wider study area, and the presence of the small watercourse running through and adjacent to the site may increase the archaeological potential, as such watercourses elsewhere in the county have been found to be the focus of late prehistoric settlement/activity.

The conclusions reached with regards to the potential impact on the setting of the scheduled Blithewood Moated Site, which lies c.780m to the east of the application site, are generally supported, and we agree that the additional screening proposed (it seems from the submitted Landscape Plan that hedgerow enhancement is proposed for the eastern boundary of the site) would further reduce the effect of the proposals on this designated heritage asset. With regards to the potential impact of the proposals on the wider historic built environment, including nearby designated heritage assets such as listed buildings and conservation areas, we will defer to the knowledge and experience of your Conservation Officer colleague and Historic England (where appropriate) on these matters.

The design of the site to ensure that the non-designated medieval moat located in the southern part of the application site is excluded from the development, along with a suitable buffer, is welcomed, as is the effort to retain the identified historic hedgerows, which are tangible remains of 18th and 19th century enclosure in this part of Staffordshire, within the application site. It is also supported that, as also outlined in the CHBIA (Section 10.1.3), the applicant will consider alternative design options to limit harm to below ground archaeological remains, ensuring the *preservation in situ* of remains of medium sensitivity (or higher), should they be encountered by the further archaeological evaluation works outlined below.

Archaeological Recommendations

Taking the above into account, whilst we do not wish to raise any archaeological objections to the proposed development, should permission be granted, an archaeological evaluation, comprising archaeological evaluation trenching* which will further characterise potential below ground archaeological features identified by the CHBIA and the geophysical survey and indeed notionally 'blank' areas across the site. This would be appropriate given the archaeological potential of the site, the scale of the scheme, and the lack of previous archaeological interventions in the wider area.

The archaeological evaluation 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.

*Alternatively, I am happy to discuss an alternative evaluation and characterization approach with the applicant's archaeological advisors. This innovative approach, which combines geophysical survey, UAV survey, geochemical analysis, and targeted trial trenching, has been trialed to good effect elsewhere in the county on consented solar farm sites.

Policy and Standard and Guidance

The above approach, i.e. archaeological evaluation by means of trial trenching, is supported by NPPF (2024) para 207, which states that:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation'.

Any further archaeological works which stem from the evaluation are supported by para 218 which states that:

'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets 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. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted'.

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 the relevant SCCHET Model Brief (which can be found in our [Archaeology Standard](#)), which should inform the production of the conditioned Archaeological Project

Design (APD), the Chartered Institute for Archaeologists (CIfA) Code of Conduct (or equivalent), and to a level commensurate with the relevant CIfA Standard 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, an Archaeological Project Design shall be submitted for the written approval of the Local Planning Authority. The Archaeological 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 Archaeological Project Design approved under condition (A).

C) The development shall not be brought into use until the site investigation and post-excavation assessment (if deemed necessary) has been completed in accordance with the Archaeological 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,

Shane Kelleher

Shane Kelleher

County Archaeologist

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**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. These fees were already paid by your Archaeological Advisor at the pre-app stage and as such are not liable in this instance. More details can be found in our County Archaeology Standard:

<https://www.staffordshire.gov.uk/Environment/Documents/SCC-County-Archaeology-Standard-v1-incl-Model-Briefs.pdf>