

Response to Heritage Comments

Land west of A6, north of Buxton, Derbyshire

Date: 17/02/2025 | Pegasus Ref: P24-1678

Derbyshire Planning Ref: HPK/2024/0467

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Document Management.

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1. Introduction

- 1.1. Following the receipt of comments from the Archaeological Officer for Derbyshire, regarding potential adverse effects arising from the construction of the BESS scheme in relation to the remains of a Roman road (Derbyshire HER MDR11199 and MDR230), Pegasus Group have been commissioned to provide a response.
- 1.2. This document provides a review of the potential heritage constraints highlighted by the Officer and then details how these areas of concern have been addressed through changes to the design of the proposed development and appropriate management steps to safeguard the Roman road during the construction and operation of the BESS.
- 1.3. A full copy of the comments received is included at Appendix 1. The key points raised can be summarised as follows:
 - That the remains of the Roman road within the site are sufficiently well-preserved to be of commensurate significance to a designated heritage asset. And that the local planning authority needed clarity over how archaeological remains on the site might be impacted by the current proposals.
 - The access road could well bring the development almost on top of the earthwork and potentially over associated remains to the side.
 - The Roman road is within a landscaped area, although it is unclear how the applicant proposes to manage the monument within the site going forward in terms of its conservation, when for example self-set trees could damage the earthwork through root action.
 - The extent of the existing earthwork agger should be marked on development plans. An appropriate buffer to the edge of the earthwork from any part of the development should be at least 5m – this would usually cover the extent of any side ditches and was the buffer applied by Historic England in relation to the scheduled agger at Brassington Lane, Old Tupton. The buffer must be shown and quantified on the development plans.
 - Proposals should be included to cover the management of the heritage asset within the site going forward, with a management regime put in place to promote conservation of the Roman road both above and below-ground.

2. Initial Design

- 2.1. Following the receipt of the Officer's comments a detailed review of the potential areas of conflict between the earthwork remains of the Roman road was undertaken so that a revised design could be developed in response.
- 2.2. The LiDAR data covering the site indicated the alignment of the upstanding agger of the Roman road and suggested the presence of an adjacent ditch on the eastern side (Plate 1). The alignment and extent of the earthwork is marked in pink.

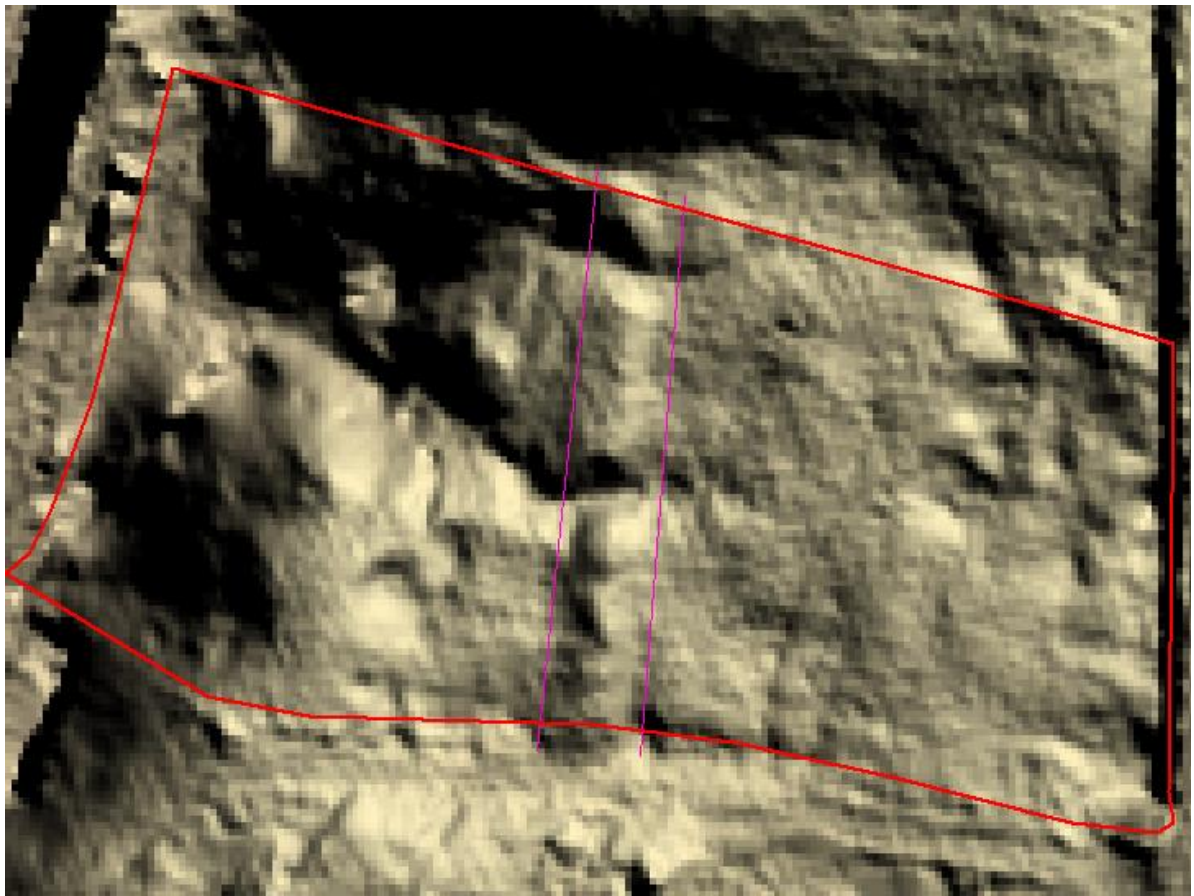


Plate 1: LiDAR data showing agger and ditch

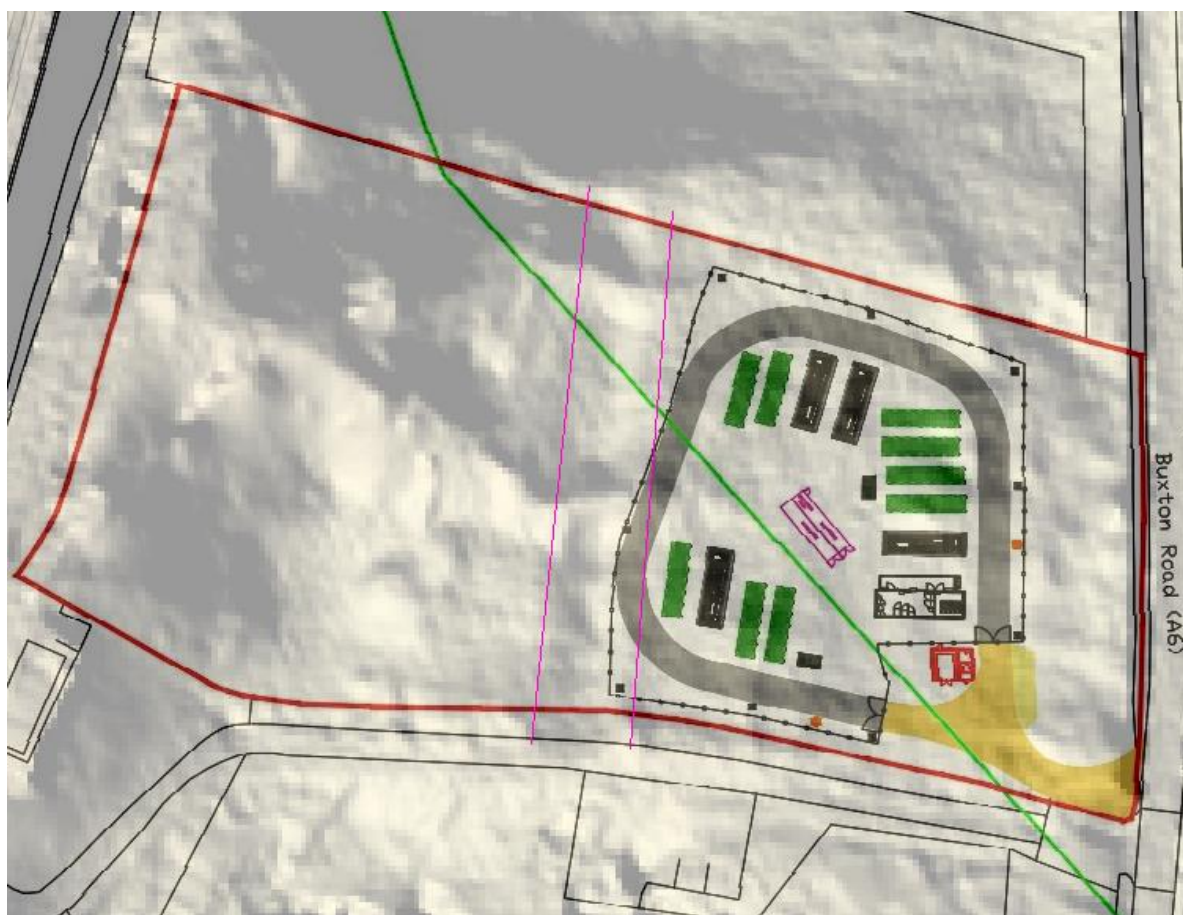


Plate 2: Initial Design overlain on LiDAR data (with road marked in pink)

- 2.3. There was some disparity noted between the LiDAR data and the geophysical survey data (Plate 3) as the geophysical survey suggested the road deviated to the north-east.



Plate 3: Geophysical Survey Interpretation (LiDAR road alignment marked in pink)



Plate 4: Initial Design overlain on Geophysical survey results

- 2.4. The initial design had been developed to avoid the extent of the road remains as identified by the geophysical survey (Plate 4). However, the disparity between the LiDAR and geophysical survey data has meant that a clash between the access road and boundary fence and the earthwork remains of the agger had not been identified within the initial layout.
- 2.5. The disparity between the agger and the geophysical survey results is likely to indicate that some of the roadstone within the road had been disturbed as a result of quarrying the material for alternate uses following the abandonment of the road. The apparent extent of disturbance to the earthwork and its immediate surroundings is also clear in the LiDAR data.

3. Revised Design

- 3.1. In response to the identified conflict between the proposed layout and the Roman road a revised design has been prepared (Plate 5). This has removed the south-western BESS unit and realigned the western elements of the access road and boundary fence to allow a 5m buffer between the proposed development and the Roman road.

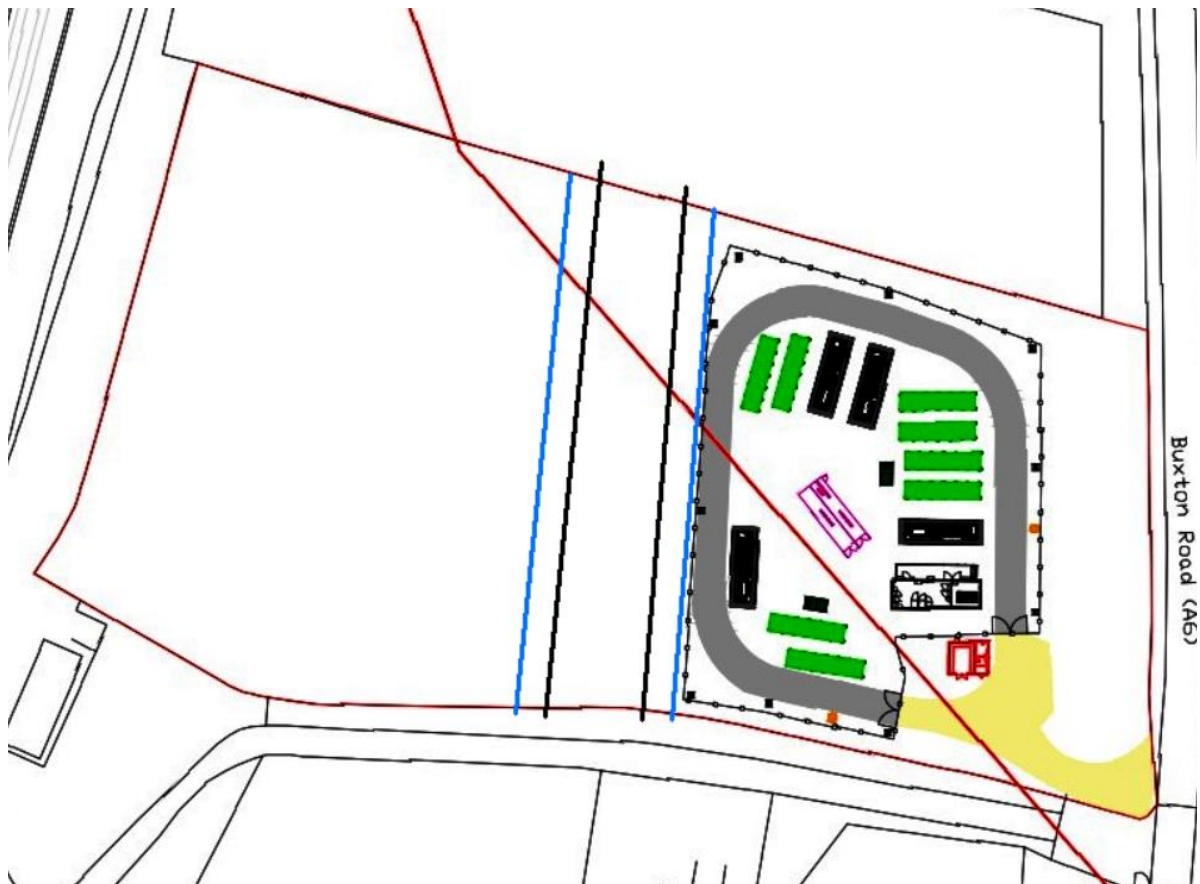


Plate 5: Revised Layout with Agger (marked in black) and 5m buffer (marked in blue)

- 3.2. The revised design has taken account of the extent of the identified Roman road remains, as shown by both the LiDAR data and geophysical survey and applied a 5m buffer in relation to both the BESS compound and the proposed landscape planting associated with the scheme.
- 3.3. The approach adopted is precautionary to ensure that the asset is protected during both construction and operation.

4. Management of the Asset

Construction Phase

- 4.1. During construction it is proposed that the extents of the buffer zone are surveyed in and clearly marked on site to ensure no encroachment of plant or machinery across the agger or the potential ditches. The boundaries will be clearly fenced and marked to ensure no errors by the construction crew.
- 4.2. It is envisaged that a programme of archaeological evaluation to test the anomalies, beyond the agger, will be conducted pre-commencement as the Officer has noted they are happy for such works to be secured by condition.

Operation Phase

- 4.3. During the operation of the BESS scheme the agger and its associated buffer zone will be retained as grassed open space. The grass will be kept low through grazing or mowing to ensure minimal ground disturbance this will also ensure no self-set tree growth.

5. Significance

- 5.1. The potential significance of the earthwork remains of the Roman road has been considered with specific regard to the Historic England Scheduling selection criteria for transport sites.¹

'It is thought that there were some 9,500 miles of Roman road nationally; while much of the network has been mapped, a much smaller proportion is known to survive physically.'

Where designation is more appropriate is in instances where the Roman road survives as an upstanding earthwork because the later road diverges from this line ... although consideration should be given to the likelihood that the Roman road surfacing may have been robbed for hardcore, in which case designation will be less likely.'

- 5.2. Whilst the Officer has suggested that the section of Roman road within the site is sufficiently well-preserved to have significance commensurate with a scheduled monument the quote from the selection criteria indicates that the removal of roadstone for hardcore would be likely to reduce the significance of an asset to below the threshold for designation.
- 5.3. With regard to the length of agger within the site it is acknowledged as a visible earthwork, however there is clear evidence of the road surfacing having been quarried for material both in terms of visible evidence of quarrying activity (Plate 6) and also in terms of the evidence provided from the geophysical survey results which showed stone to the east of the surviving agger.

¹ historicengland.org.uk/images-books/publications/dssg-transport-sites/heag254-transport-sites-ssg/

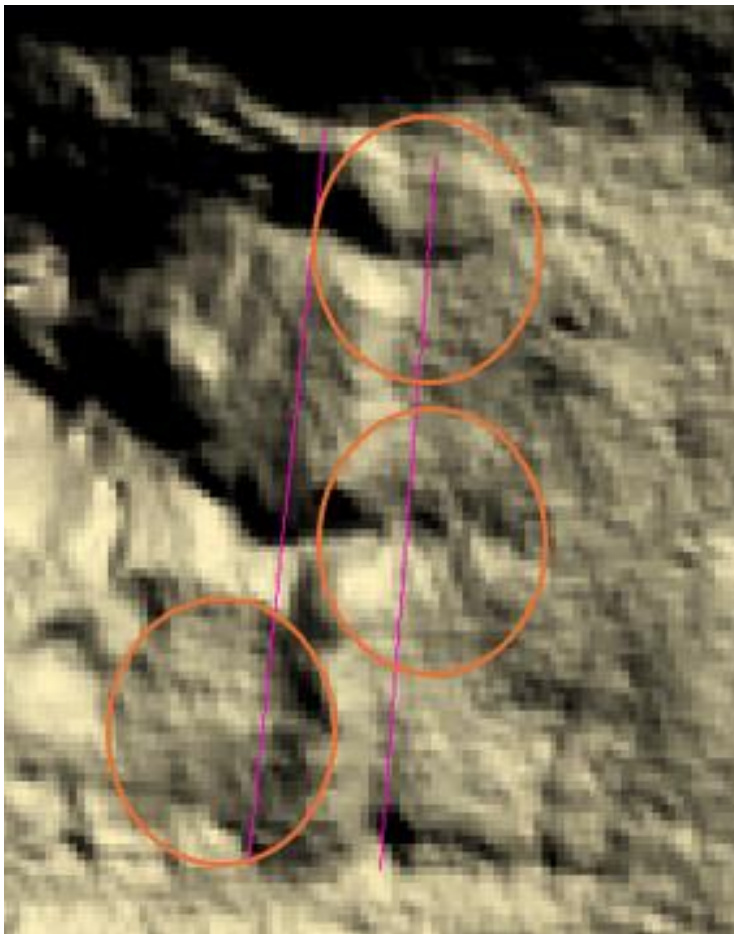


Plate 6: LiDAR data showing areas of quarrying (marked in orange) that affect the agger

- 5.4. Given the scale of disturbance to the length of agger within the site it is considered unlikely that the asset would be deemed to retain sufficient significance to merit designation as a scheduled monument. Furthermore, to the south of the site there is a better-preserved length of the same road which would be a more appropriate representative sample should a section of the road be deemed suitable for designation.
- 5.5. Therefore, it is considered that the remains of the Roman road within the site are a non-designated heritage asset of regional significance they do not meet the high bar required for such an asset to be considered of demonstrably equivalent significance to a scheduled monument. As such NPPF footnote 75 and paragraphs 212–215 would not apply.

6. Conclusions

- 6.1. This response has identified that the remains of the Roman road within the site are unlikely to meet the high bar required for designation as a scheduled monument and should not therefore be considered as a non-designated heritage asset of equivalent significance to a designated asset.
- 6.2. Given the evidence of disturbance to the agger within the site the project team considers it to be a non-designated heritage asset of regional significance.
- 6.3. Nevertheless, the project team has adopted a precautionary approach to the preservation and management of the Roman road. The scheme has been redesigned to offset the layout from the extent of the agger with a 5m buffer to ensure the scheme does not cause harm to the remains of the asset.
- 6.4. Proposals to safeguard the asset during the construction and operation phases have been developed to ensure the on-going preservation of the earthworks through an exclusion zone during the construction phase and grazing or mowing to ensure the agger remains clear of trees during the operation phase.
- 6.5. Therefore, all of the comments raised by the Officer have been addressed and the potential for the agger to be adversely affected by the proposed development has been substantially reduced.

Appendix 1: Officer Comments

From:
To:
Cc:
Subject: HPK/2024/0467 LAND WEST OF Buxton Road Dove Holes. Battery Energy Storage System and associated works - archaeology
Date: 29 January 2025 12:18:05

Dear Declan,

Thank you for reconsulting on the above planning application. I previously provided comments in Dec 2024 and the applicant has subsequently submitted their geophysical survey which also includes LiDAR imagery.

The proposal site contains part of the line of a Roman road thought to run from Buxton to the fort at Melandra, Glossop (properly Ardotalia) – Derbyshire HER MDR11199 and MDR230. The preservation and significance of the road varies greatly along its length, but the section within the current site appears on the basis of LiDAR and aerial photography to be represented by a well-preserved earthwork bank (known as the *agger*, on which the road surface would have been constructed), and this feature is also picked up in the recently submitted geophysics. Because sections of well-preserved *agger* elsewhere in the county are scheduled, I recommend on this basis that the local planning authority considers these Roman road remains nationally important and therefore applies NPPF footnote 75, that "Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets".

The Roman road remains within the site are therefore subject to NPPF paras 212-215 for designated heritage assets, with 'great weight' given to the asset's conservation. In previous comments I noted in summary that the local planning authority needed 'clarity over how ... archaeological remains on the site might be impacted by the current proposals'.

The current site plan aims (Heritage Statement Plates 6 and 7) to incorporate the BESS development wholly to the east of the Roman road earthwork with 'a buffer from the development to safeguard the asset' (6.28). The caption on Plate 7 reads 'the nearest container is over 8m from the spread of the Roman road'. However, Roman roads often have side ditches to each side which would be outside the spread of the *agger*, and the presence/absence of these has not been established, nor is the *agger* earthwork marked on any of the submitted development plans such as the Figure 4 Landscape Plan. Although I note the buffer between the containers and *agger* earthwork the Landscape Plan shows an internal access track and perimeter fence between the containers and the monument, which – working from the drawing scale – could well bring the development almost on top of the earthwork and potentially over associated remains to the side.

In addition, although the Roman road is within the red line boundary and within a landscaped area, it is unclear how the applicant proposes to manage the monument within the site going forward in terms of its conservation, when for example self-set trees could damage the earthwork through root action.

There is consequently therefore still a lack of clarity in terms of potential impacts to the Roman road earthwork and associated archaeological remains, in terms of the information base at NPPF para 208 and proportionate to a nationally important asset. Put simply, we do not know how close the edge of the development is to the nationally important archaeological remains, and consequently how they will be impacted. I therefore maintain my previous objection to these proposals in terms of a lack of information against NPPF para 208 and in recognition of the high level of importance attached to these assets.

This objection may be addressed as follows:

1. The extent of the existing earthwork *agger* should be marked on development plans

including the Figure 4 Landscape Plan. An appropriate buffer to the edge of the earthwork from any part of the development should be at least 5m – this would usually cover the extent of any side ditches and was the buffer applied by Historic England in relation to the scheduled *agger* at Brassington Lane, Old Tupton. The buffer must be shown and quantified on the development plans.

2. Proposals should be included to cover the management of the heritage asset within the site going forward, with a management regime put in place to promote conservation of the Roman road both above and below-ground.

I have also considered the possibility of further archaeological remains within the wider site – whether associated with the Roman road earthwork or not. The geophysical survey suggests that some features may be present to the west of the road line but there are none detected on the east where the proposed BESS site is located (though geophysical survey is not of course foolproof). Roadside settlement of Roman date is possible but is rare in my experience within Derbyshire outside the immediate environs of towns/settlements. I also note that BESS development can be very light touch (or even zero-dig) in terms of ground impact, which lends itself to avoidance of impacts by design. I therefore feel on balance that provided the applicant applies the appropriate buffering/management to the known road line as outlined above, further archaeological assessment of the development area by trial trenching can be deferred post-consent and secured by planning condition. This would require testing of the development footprint by trenching and subsequent mitigation of development impacts to significant archaeology by design or excavation/recording as appropriate.

Regards

Steve Baker MA MCIFA | **Archaeologist** | Conservation, Heritage and Design | Place | Derbyshire County Council |

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