

From: [Steve Baker \(Place\)](#)
To: [Declan Cleary](#)
Cc: [Planning \(HPBC\)](#)
Subject: RE: HPK/2024/0467 - BESS Scheme, A6, Dove Holes
Date: 11 March 2025 13:28:23
Attachments: [HPK20240467 LAND WEST OF Buxton Road Dove Holes. Battery Energy Storage System and associated works - archaeology.msg](#)
[HPK20240467 LAND WEST OF Buxton Road Dove Holes. Battery Energy Storage System and associated works - archaeology.msg](#)

Dear Declan,

Thank you for reconsulting on the above planning application, following submission of additional information. I have previously provided comments on this application on 10/12/2024 and 29/01/2025 (attached).

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”.

In my most recent advice I objected to the proposals because of a lack of clarity in terms of proposed 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. I indicated that this objection could be overcome 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.

The applicant has submitted additional information, comprising an amended layout and landscaping plan which now show the Roman road line with a quantified 5m buffer applied, and I am now satisfied that the development proposals would not harm this nationally important heritage asset. I have not seen any further submission against point 2 above; however I am inclined to suggest that the management of the heritage asset going forward - including the development and delivery of a management plan – could adequately be secured through a planning condition which would need to apply pre-commencement on the development (i.e. that the management plan is in place and agreed before any work commences on site).

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 recommend on balance that 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.

I consequently have no further objection to the development proposals, subject to the imposition of planning conditions as follows, in line with para 212, footnote 75 and para 218 of the NPPF:

"a) No development shall take place until a Written Scheme of Investigation for archaeological work has been submitted to and approved by the local planning authority in writing, and until any pre-start element of the approved scheme has been completed to the written satisfaction of the local planning authority. The scheme shall include an assessment of significance and research questions; and

1. The programme and methodology of site investigation and recording
2. The programme for post investigation assessment
3. Provision to be made for analysis of the site investigation and recording
4. Provision to be made for publication and dissemination of the analysis and records of the site investigation
5. Provision to be made for archive deposition of the analysis and records of the site investigation
6. Nomination of a competent person or persons/organization to undertake the works set out within the Written Scheme of Investigation
7. A Conservation and Management Plan in relation to the Roman road within the site, detailing the measures to be taken during the construction and operational phases of the development to secure the preservation *in situ* and ongoing conservation of this heritage asset."

"b) No development shall take place other than in accordance with the archaeological Written Scheme of Investigation approved under condition (a)."

"c) The development shall not be brought into use until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the archaeological Written Scheme of Investigation approved under condition (a) and the provision to be made for publication and dissemination of results and archive deposition has been secured."

Regards

Steve Baker MA MCIFA | Archaeologist | Conservation, Heritage and Design | Place |
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From: Declan Cleary
Sent: 26 February 2025 09:32
To: Steve Baker (Place)
Subject: HPK/2024/0467 - BESS Scheme, A6, Dove Holes

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Hi Steve,

I have been instructed to deal with the above application, as case officer, on behalf of High Peak Borough Council.

We received an amended layout and heritage response on 20/02 and I understand that you have (hopefully) been reconsulted on these.

I have just received an updated site plan and landscape plan which now shows the route of the Roman Road and a suggested buffer (same layout as the 20/02 plan). I attach these for information in advance of receiving your formal response to the consultation.

Any queries please let me know.

Kind Regards

Declan

Declan Cleary (for HPBC)

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