

Land on the Southwest Side
of Levedale Road
Penkridge
Staffordshire

Proposed 49.9MW
Battery Storage Scheme

Historic Environment
Desk Based Assessment

Project Ref: AH1546

July 2022



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1. SUMMARY

PROJECT NAME:	LAND ON THE SOUTHWEST SIDE OF LEVEDALE ROAD: PROPOSED 49.9MW BATTERY STORAGE SCHEME
LOCATION:	PENKRIDGE, STAFFORDSHIRE
NGR:	390111, 315918 (CENTRE)
TYPE:	HISTORIC ENVIRONMENT DESK BASED ASSESSMENT

In May 2022 Armour Heritage was commissioned to complete an historic environment desk-based assessment (HEDBA) in relation to a proposal for the construction of a 49.9MW Battery Storage Scheme (BESS) on land to the southwest side of Levedale Road, Penkridge, Staffordshire, centred on NGR 390111, 315918. The Site comprises an area of *c.* 7.8ha partly occupying two field units, referred to hereafter as the North Field and the South Field, both of which were under agricultural cultivation at the time of the site visit in late May 2022. Only the southern area is proposed for the BESS development.

Three Grade II Listed Buildings lie in proximity to the Site, comprising; *Field House Farmhouse* (List Entry 1039224), situated *c.* 365m to the northwest, *Levedale Farmhouse* (List Entry 1295025) which lies some 510m to the north and *Longridge House* (List Entry 1294998) which lies *c.* 500m to the east.

The specific aims of this historic environment assessment were:

- an assessment of the potential for survival of archaeological deposits at the Site;
- an assessment of previous impacts at the Site; and
- scoping and assessment of the potential for impacts on the setting and significance of designated heritage assets within 1km and 2km study areas.

Initial desk based studies identified no designated heritage assets whose settings were considered to be at risk of harm as a result of the proposed development. This was confirmed during the site visit.

The Site represents a relatively small area within a larger swathe of agricultural land west of Penkridge. Historically the land has been farmed since at least the 19th century and probably far longer, with later boundary changes evident through study of historic maps. The only impact of any significance found in the historical cartographic records is a clay extraction pit in the South Field, now infilled. It has been concluded that there is a high probability that numbers of smaller extraction pits may exist across the Site.

The potential for significant buried archaeology at the Site has been assessed as low in respect of all archaeological periods. The proposed development, including compounds, fencing, security lighting and CCTV, and cable and access routes, has the capacity to disturb archaeological deposits where present. Any finds and/or features present at the Site are considered most likely to be of local importance.

The UK Government is committed to the country becoming carbon neutral by 2050 and fully decarbonising the energy sector by 2035. The provision of renewable energy in all its forms is integral to meeting this target.

This assessment has been completed with due regard to the revised NPPF, the PPG, the South Staffordshire Core Strategy, and guidance issued by Historic England and the ClfA.

2. INTRODUCTION

Outline

- 2.1. In May 2022 Armour Heritage was commissioned to complete an historic environment desk-based assessment (HEDBA) in relation to a proposal for the construction of a 49.9MW Battery Storage Scheme (BESS) on land to the southwest side of Levedale Road, Penkridge, Staffordshire, centred on NGR 390111, 315918 and referred to hereafter as ‘the Site’ (Image 1).

The Site

- 2.2. The Site comprises an area of c. 7.8ha partly occupying two field units, referred to hereafter as the North Field and the South Field, both of which were under agricultural cultivation at the time of the site visit in late May 2022.

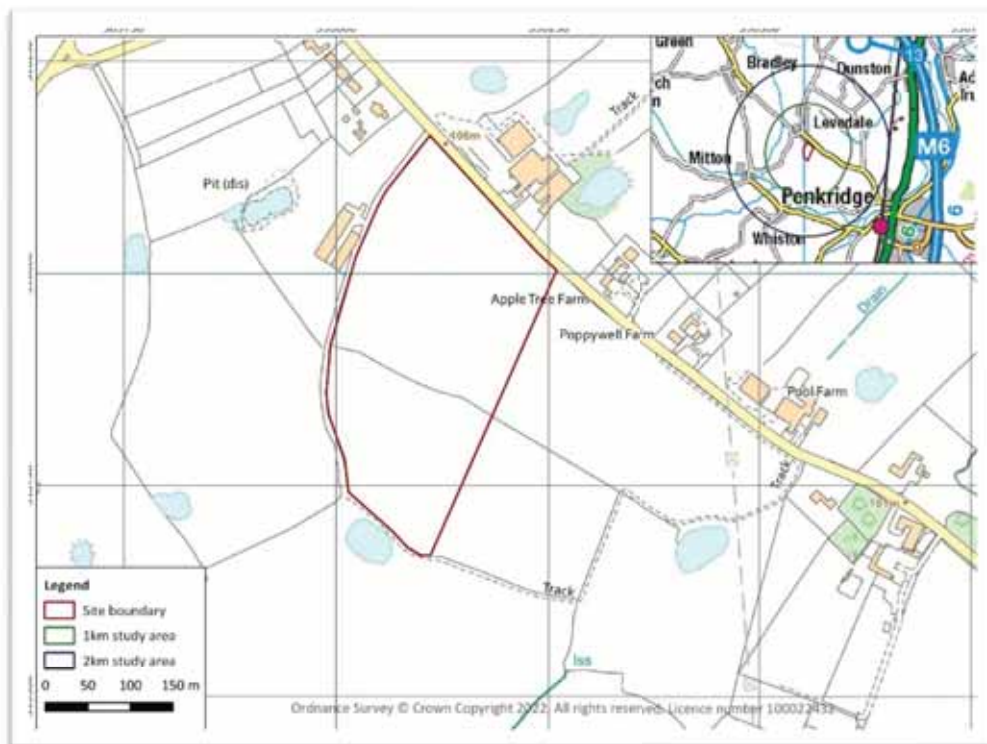


Image 1: Site location plan

- 2.3. Three Grade II Listed Buildings lie in proximity to the Site, comprising; *Field House Farmhouse* (List Entry 1039224), situated c. 365m to the northwest, *Levedale Farmhouse* (List Entry 1295025) which lies some 510m to the north and *Longridge House* (List Entry 1294998) which lies c. 500m to the east.
- 2.4. The Site slopes gently down from north to south, lying at elevations of between c. 107m and 104m OD.

British Geological Survey data

- 2.5. The underlying geology of the Site is recorded by the British Geological Survey (BGS) as Mercia Mudstone Group - Sandstone; a sedimentary bedrock formed between 252.2 and 201.3

million years BP. Superficial geological deposits are recorded as Glaciofluvial Deposits, Devensian; formed between 1.16 million and 118,000 years BP.



Image 2: Aerial view of Site showing nearby Listed Buildings

Planning proposal

- 2.6. The planning proposal comprises the development of a 49.9MW Battery Storage Scheme (BESS) at the Site. Further detail of the proposal is set out later in this report.

Project aims

- 2.7. The specific aims of this historic environment assessment are:
- an assessment of the potential for survival of archaeological deposits at the Site;
 - an assessment of previous impacts at the Site; and
 - scoping and assessment of the potential for impacts on the setting and significance of designated heritage assets within 1km and 2km study areas.

Limitations of data

- 2.8. Much of the data used in this assessment consists of secondary information derived from a variety of sources, only some of which have been directly examined for the purposes of this assessment. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.
- 2.9. It is recognised that the Staffordshire Historic Environment Record (HER) does not comprise a record of all surviving elements of the historic environment resource, representing instead a record of the discovery of a wide range of archaeological and historical components in the county. The information held by the HER does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.

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Instruction and limitations of this report

- 2.11. Armour Heritage can accept no responsibility for the accuracy of the survey if the Site has been accidentally or deliberately disturbed leading to damage to, or removal of, historic fabrics, features or archaeological remains.
- 2.12. Assignment of this report without the written consent of Armour Heritage Limited is forbidden. An assignment can be easily arranged but may require a re-assessment.
- 2.13. In the case of a change of plans, site use, site layout or changes of use of the wider area or buildings and/or end use, then a new assessment may be required to ensure its fitness for purpose.

3. PLANNING POLICY CONTEXT

Introduction

- 3.1. There is national legislation and guidance relating to the protection of, and Proposed Development on or near, important archaeological sites or historical buildings within planning regulations as defined under the provisions of the *Town and Country Planning Act 1990*. In addition, local authorities are responsible for the protection of the historic environment within the planning system.

Planning policy and guidance

- 3.2. The assessment has been written within the following legislative, planning policy and guidance context:
- National Heritage Act 1983 (amended 2002);
 - Town and Country Planning Act (1990);
 - Planning (Listed Buildings and Conservation Areas) Act (1990);
 - National Planning Policy Framework (2021);
 - Planning Practice Guidance, Historic Environment (last updated July 2019);
 - Historic Environment Good Practice Advice in Planning: Note 2 - Managing Significance in Decision-taking in the Historic Environment (Historic England 2015)
 - Historic Environment Good Practice Advice in Planning: Note 3 - The Setting of Heritage Assets (Historic England 2015);
 - Conservation Principles: policies and guidance for the sustainable management of the historic environment (English Heritage 2008).

Planning (Listed Buildings and Conservation Areas) Act (1990)

- 3.3. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the *Listed Buildings Act*) imposes a general duty in respect of Listed Buildings in the exercise of planning functions.

- 3.4. Subsection (1) provides: “In considering whether to grant planning permission for development which affects a Listed Building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.

National Planning Policy Framework (NPPF)

Chapter 16: Conserving and enhancing the historic environment

- 3.5. The July 2021 revision of the National Planning Policy Framework sets out planning policies relating to conserving and enhancing heritage assets. It defines heritage assets (para. 189) as ranging from “...sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”.
- 3.6. The NPPF states (para. 190) that: “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should consider:
- a. the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - b. the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c. the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d. opportunities to draw on the contribution made by the historic environment to the character of a place”.
- 3.7. In para. 191, the policy states that “When considering the designation of Conservation Areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest”.

Proposals affecting heritage assets

- 3.8. A key policy section within the NPPF (Paras. 194-198) 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”.
- 3.9. The NPPF continues “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact

of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal".

- 3.10. Para. 196 adds "Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision".
- 3.11. Of considerable importance to the planning process, para. 197 states that "In determining applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

- 3.12. In respect of impact assessment, para. 199 sets out that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance". Para. 200 continues "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- Grade II Listed Buildings, or Grade II Registered Parks or Gardens, should be exceptional;
 - assets of the highest significance, notably Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, and World Heritage Sites, should be wholly exceptional.
- 3.13. Footnote 68 with reference to bullet point b, above, refers to non-designated heritage assets, and considers them only in respect of their archaeological significance. It states "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".
- 3.14. Of considerable importance is para 201 which states "Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or *all* [AH emphasis] of the following apply:
- the nature of the heritage asset prevents all reasonable uses of the site; and
 - no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - the harm or loss is outweighed by the benefit of bringing the site back into use".

- 3.15. Paras. 202-205 set out additional policy in this regard: “(202) Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. (203) The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. (204) Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred. (205) 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”.
- 3.16. Regarding designated areas, the NPPF sets out in para. 206 that “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably”.
- 3.17. It continues in para. 207 “Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole”.
- 3.18. Finally, in para. 208, it is set out that “Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies”.

Planning Practice Guidance (PPG)

- 3.19. Planning Practice Guidance has been issued to reflect changes to the National Planning Policy Framework. A summary of the PPG’s sections on heritage matters is set out below.

Setting

- 3.20. On ‘setting’, the PPG sets out (para. 013 Reference ID: 18a-013-20190723) that “All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset’s curtilage may not have the same extent”.
- 3.21. It continues “The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from

other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time”.

Harm

- 3.22. The PPG sets out further information on the degrees of harm which might result from development affecting a heritage asset (para. 018 Reference ID: 18a-018-20190723). It states “Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply. Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated”.
- 3.23. It continues “Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting. While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings’ significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting”.
- 3.24. A further section addresses the concept of harm in a Conservation Area situation (para. 019 Reference ID: 18a-019-20190723). It states that “Paragraph 201 of the National Planning Policy Framework is the starting point. An unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building. If the building is important or integral to the character or appearance of the conservation area then its proposed demolition is more likely to amount to substantial harm to the conservation area, engaging the tests in paragraph 195 of the National Planning Policy Framework. Loss of a building within a conservation area may alternatively amount to less than substantial harm under paragraph 196. However, the justification for a building’s proposed demolition will still need to be proportionate to its relative significance and its contribution to the significance of the conservation area as a whole. The same principles apply in respect of other elements which make a positive contribution to the significance of the conservation area, such as open spaces”.

Public benefit

- 3.25. An important aspect of the assessment of harm is the identification of public benefit to a proposal which would offset the harm identified. The PPG states (Para 020 Reference ID: 18a-020-20190723) “Public benefits may follow from many developments and could be anything

that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit”.

3.26. Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting;
- reducing or removing risks to a heritage asset; or
- securing the optimum viable use of a heritage asset in support of its long-term conservation.

Local planning policy: South Staffordshire Core Strategy

Policy EQ3: Conservation, Preservation and Protection of Heritage Assets

3.27. The policy states that: “The conservation and enhancement of South Staffordshire’s historic environment will be achieved by a number of means:

3.28. a) The Council will establish, review and maintain records of known heritage assets including:

- Listed Buildings
- Scheduled Ancient Monuments
- Conservation Areas
- Registered Parks and Gardens
- Buildings of Special Local Interest (a ‘local list’)
- Undesignated heritage assets
- Other historic landscapes

and will support and encourage ever greater appreciation, knowledge and enjoyment of the District’s historic environment and heritage assets through:

- joint working with local communities and interest groups such as civic and historical societies;
- the continual development and refinement of the Local List; and
- interaction with the County Council’s Historic Environment Record (HER).

3.29. b) The Council will support and encourage measures which secure the improved maintenance, management and sustainable reuse of heritage assets, particularly those which are identified nationally or locally as being at risk. Where necessary an assessment will be made of whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

3.30. c) The Council will ensure that development which affects a heritage asset, or its setting will be informed by a proportionate assessment of the significance of the asset, including its setting, which is likely to be affected by the proposals. These will be judged by considering the extent to which an asset’s archaeological, architectural, historic or artistic interest will be harmed, including its conservation, in the interest of present and future generations.

- 3.31. d) In the case of development in a conservation area proposals will be considered against any management plan and appraisal adopted for that area.
- 3.32. e) The Council will consider the significance and setting of all proposed works to heritage assets, informed by relevant guidance that is supported by English Heritage. In addition the following principles will be adhered to:
- minimising the loss and disturbance of historic materials
 - using appropriate materials, and
 - ensuring alterations are reversible
- 3.33. f) The Council will require all works proposed to heritage assets, or sites with the potential to include assets, to be informed by a level of historical, architectural and archaeological evidence proportionate to their significance. Where appropriate, the Council may also require historical research and archaeological recording to be undertaken before works to a heritage asset commence.

Heritage assets including Listed Buildings (and those on a local list) Registered Parks and Gardens (and other historic landscapes) Conservation Areas and Scheduled Ancient Monuments are identified on the Policies Map and Inset Plans.

- 3.34. Development proposals should be consistent with the NPPF, the adopted Village Design Guide Supplementary Planning Document (or subsequent revisions) and other local planning policies.

4. METHODOLOGY

Guidance

- 4.1. This assessment has been carried out with reference to guidance documents produced by Historic England since 2008, and, where appropriate, in accordance with the Chartered Institute for Archaeologists' *Standards and Guidance for Historic Environment Desk-Based Assessment* (CIfA 2014), as set out below.

Historic Environment Good Practice Advice in Planning: Note 2 - Managing Significance in Decision-taking in the Historic Environment

- 4.2. The GPA note advises a 6-stage approach to the identification of the significance of a heritage asset and the potential effects on its significance resulting from any development.
- 4.3. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest. A variety of terms are used in designation criteria (for example outstanding universal value for world heritage sites, national importance for Scheduled Monuments and special interest for Listed Buildings and Conservation Areas), but all of these refer to a heritage asset's significance.
- 4.4. The list of Steps is set out below, however the GPA does add "...it is good practice to check individual stages of this list, but they may not be appropriate in all cases and the level of detail applied should be proportionate. For example, where significance and/or impact are relatively low, as will be the case in many applications, only a few paragraphs of information might be needed, but if significance and impact are high then much more information may be necessary".

- 4.5. The recommended *Steps* are as follows:
1. Understand the significance of the affected assets;
 2. Understand the impact of the proposal on that significance;
 3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
 4. Look for opportunities to better reveal or enhance significance;
 5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
 6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.
- 4.6. Regarding the application process, the GPA offers the following advice: “Understanding the *nature of the significance* is important to understanding the need for and best means of conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.
- 4.7. Understanding the *extent of that significance* is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.
- 4.8. Understanding the *level of significance* is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives”.
- 4.9. Regarding the assessment of the significance of a heritage asset, the GPA also states that the “...reason why society places a value on heritage assets beyond their mere utility has been explored at a more philosophical level by English Heritage in *Conservation Principles* (2008). *Conservation Principles* identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. Heritage values can help in deciding the most efficient and effective way of managing the heritage asset to sustain its overall value to society”.
- 4.10. For the purposes of this assessment and in line with *Conservation Principles*, the assessment of significance will include an assessment of a heritage asset’s communal value.

Historic Environment Good Practice Advice in Planning: Note 3 - The Setting of Heritage Assets

- 4.11. GPA note 3. expands on the six stages outlined in GPA Note 2, as set out above.
- Step 1: identifying the heritage assets affected and their settings*
- 4.12. The starting point of any assessment is the identification of those heritage assets likely to be affected by the proposed development. For this purpose, if the proposed development is seen to be capable of affecting the contribution of a heritage asset’s setting to its significance or the appreciation of its significance, it can be considered as falling within the asset’s setting.
- Step 2: Assessing whether, how and to what degree these settings contribute to the significance of the heritage asset(s)*
- 4.13. This *Step* provides a checklist of the potential attributes of a setting that it may be appropriate to consider defining its contribution to the asset’s heritage values and significance. Only a

limited selection of the possible attributes listed below is likely to be important in terms of any single asset.

The asset's physical surroundings

- Topography;
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains);
- Definition, scale and 'grain' of surrounding streetscape, landscape and spaces;
- Formal design;
- Historic materials and surfaces;
- Land use;
- Green space, trees and vegetation;
- Openness, enclosure and boundaries;
- Functional relationships and communications;
- History and degree of change over time;
- Integrity; and
- Issues such as soil chemistry and hydrology.

Experience of the asset

- Surrounding landscape or townscape character;
- Views from, towards, through, across and including the asset;
- Visual dominance, prominence or role as focal point;
- Intentional intervisibility with other historic and natural features;
- Noise, vibration and other pollutants or nuisances;
- Tranquillity, remoteness, 'wildness';
- Sense of enclosure, seclusion, intimacy or privacy;
- Dynamism and activity;
- Accessibility, permeability and patterns of movement;
- Degree of interpretation or promotion to the public;
- The rarity of comparable survivals of setting;
- The asset's associative attributes;
- Associative relationships between heritage assets;
- Cultural associations;
- Celebrated artistic representations; and
- Traditions.

Step 3: Assessing the effect of the proposed development on the significance of the asset(s)

- 4.14. The third stage of the analysis is to identify the range of effects that any Proposed Development may have on setting(s), and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s).
- 4.15. The following checklist sets out the potential attributes of any proposed development which may affect setting, and thus its implications for the significance of the heritage asset. Only a limited selection of these is likely to be particularly important in terms of development.

Location and siting of development

- Proximity to asset;
- Extent;
- Position in relation to landform;

- Degree to which location will physically or visually isolate asset; and
- Position in relation to key views.

The form and appearance of the development

- Prominence, dominance, or conspicuousness;
- Competition with or distraction from the asset;
- Dimensions, scale and massing;
- Proportions;
- Visual permeability (extent to which it can be seen through);
- Materials (texture, colour, reflectiveness, etc);
- Architectural style or design;
- Introduction of movement or activity; and
- Diurnal or seasonal change.

Other effects of the development

- Change to built surroundings and spaces;
- Change to skyline;
- Noise, odour, vibration, dust, etc.;
- Lighting effects and 'light spill';
- Change to general character (e.g. suburbanising or industrialising);
- Changes to public access, use or amenity;
- Changes to land use, land cover, tree cover;
- Changes to archaeological context, soil chemistry, or hydrology; and
- Changes to communications/accessibility/permeability.

Permanence of the development

- Anticipated lifetime/temporariness;
- Recurrence; and
- Reversibility.

Longer term or consequential effects of the development

- Changes to ownership arrangements;
- Economic and social viability; and
- Communal use and social viability.

Step 4: Maximising enhancement and minimising harm

- 4.16. Enhancement may be achieved by actions including:
- removing or re-modelling an intrusive building or feature;
 - replacement of a detrimental feature by a new and more harmonious one;
 - restoring or revealing a lost historic feature or view;
 - introducing a wholly new feature that adds to the public appreciation of the asset;
 - introducing new views (including glimpses or better framed views) that add to the public experience of the asset; or
 - improving public access to, or interpretation of, the asset including its setting
- 4.17. Options for reducing the harm arising from development may include the relocation of a development or its elements, changes to its design, the creation of effective long-term visual

or acoustic screening, or management measures secured by planning conditions or legal agreements.

Step 5: Making and documenting the decision and monitoring outcomes

- 4.18. Step 5 identifies the desirability of making and documenting the decision-making process and monitoring outcomes.
- 4.19. For the purposes of the current assessment Stages 1 to 3 have been followed, with Stage 4 forming, if/where appropriate, part of the recommendations.

Chartered Institute for Archaeologists: Standard and guidance for historic environment desk-based assessment (published December 2014; updated January 2017; updated October 2020)

- 4.20. This heritage statement has also been completed in line with guidance issued by the Chartered Institute for Archaeologists (CIfA). Armour Heritage is enrolled with the CIfA as a corporate entity and is recognised as a CIfA Registered Organisation.
- 4.21. This document has been completed in line with the CIfA Standard, as set out in the aforementioned document, which states: “Desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct and other relevant regulations of CIfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so) and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact”.

Documentary research

- 4.22. Detail of designated sites and monuments was acquired from Historic England’s online National Heritage List for England (NHLE) and enhanced through further documentary research and site visits. A synthesis of all relevant and significant information is presented below, including a selection of historic maps and photographs of the Site, alongside other relevant graphics.
- 4.23. Initial studies included the consultation of readily available information from a wide range of documentary and cartographic sources.

Assessment Process

- 4.24. Underlying the identification of significance is a considered assessment process, the aim of which is as far as possible to bring objectivity to bear on the understanding of historical and archaeological value of the Site which may be affected by development within its boundaries.
- 4.25. A 1km study area was established in respect of archaeological and historic landscape data supplied by the HER and a 2km study area in relation to NHLE data on designated sites, monuments and areas.

Assessment Criteria

- 4.26. The criteria used in this assessment to assign a value to the potential magnitude of impact resulting from development are set out in Table 1, below.

Table 1: Impact Magnitude Criteria

Magnitude of Impact	Defined as
Major Adverse	Total loss or major alteration of the assets or change in its setting, leading to the total loss or major reduction in the significance of the asset
Moderate Adverse	Partial Loss or alteration of the assets or change in its setting leading to the partial loss or reduction in the significance of the asset
Minor Adverse	Slight change from pre-development conditions to the asset or change in its setting leading to the slight loss or reduction in the significance of the asset
Negligible	No change or very slight change to the asset or change in its setting resulting in no change or reduction in the significance of the asset
Minor Beneficial	Slight improvement to the asset or change in its setting which slightly enhances the significance of the asset
Moderate Beneficial	Moderate improvement to the asset or change in its setting which moderately enhances the significance of the asset
Major Beneficial	Major improvement to the asset or change in its setting which substantially enhances the significance of the asset

4.27. Table 2, below, establishes the significance of a heritage asset in line with national criteria.

Table 2: Significance of Heritage Assets

Significance	Criteria
Very High	World Heritage Sites Grade I & II* Listed Buildings Grade I & II* Registered Parks and Gardens Scheduled Monuments
High	Grade II Listed Buildings Grade II Registered Parks and Gardens Conservation Areas Registered Historic Battlefields
Medium	Non-designated heritage assets of regional importance
Low	Locally listed and other historic buildings Non-designated archaeological sites of local importance Non-designated historic parks and gardens
Negligible	Non-designated features with very limited or no historic value and/or little or no surviving archaeological or historic interest

5. ARCHAEOLOGICAL AND HISTORICAL CONTEXT

Introduction

- 5.1. The Site lies approximately 2.22km northwest of the built extents of Penkridge in the South Staffordshire district of Staffordshire, directly south of Levedale Road. It comprises an area of agricultural land over two partial field units covering c. 7.8ha.
- 5.2. An existing trackway extends southwest from Levedale Road forming the western boundary to the Site.

Site visit

- 5.3. The Site was visited on 31st May 2022, where the proposed development area and its wider setting were walked over. Attention was paid during the site visit to the surfaces of the fields to identify any artefactual evidence which might be immediately visible. No material of earlier than modern date was noted although a well-developed crop/grass covering obscured the surfaces of fields across the bulk of the Site (Image 3).



Image 3: View east across North Field from adjacent trackway

- 5.4. The wider surroundings of the Site were also assessed, including views to Listed Buildings in proximity to the Site. No intervisibility of any note was identified.
- 5.5. Observations made during the site visit informed assessments of significance and impact set out in Sections 6 and 7 of this document.

Statutory and local heritage designations

- 5.6. In total three Listed Buildings are recorded within the 1km study area, all Listed Grade II.
- 5.7. A further nine Listed Buildings are recorded in the 2km study area whilst a single Scheduled Monument lies some 1.11km northeast of the Site.

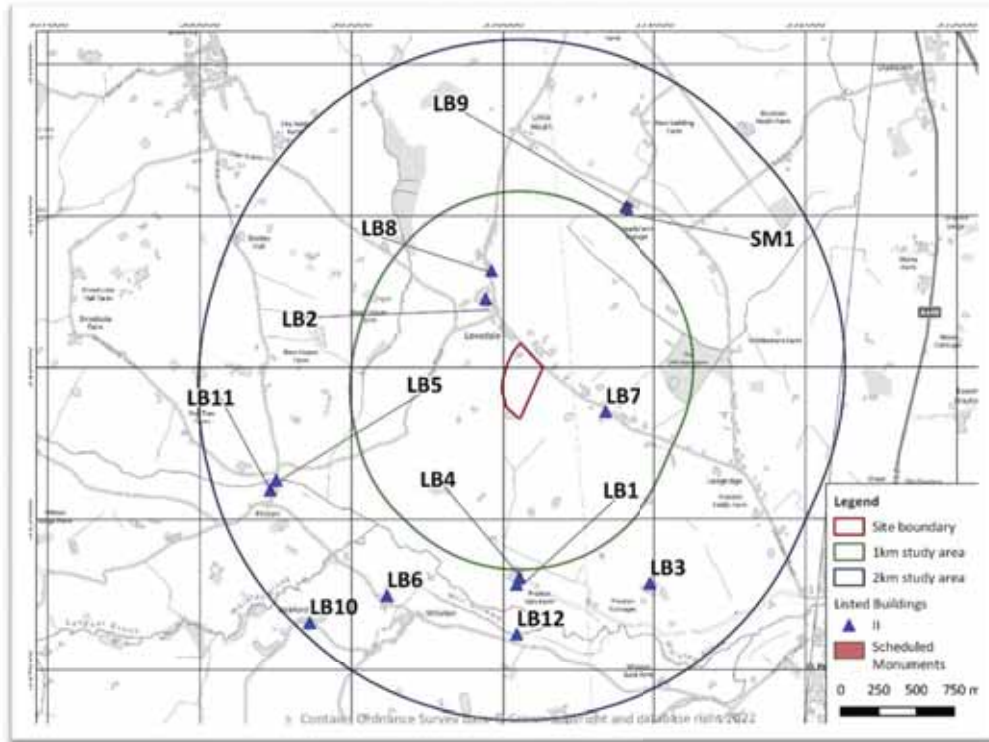


Image 4: Distribution of designated heritage assets in study areas

Archaeological and historical context

Previous studies

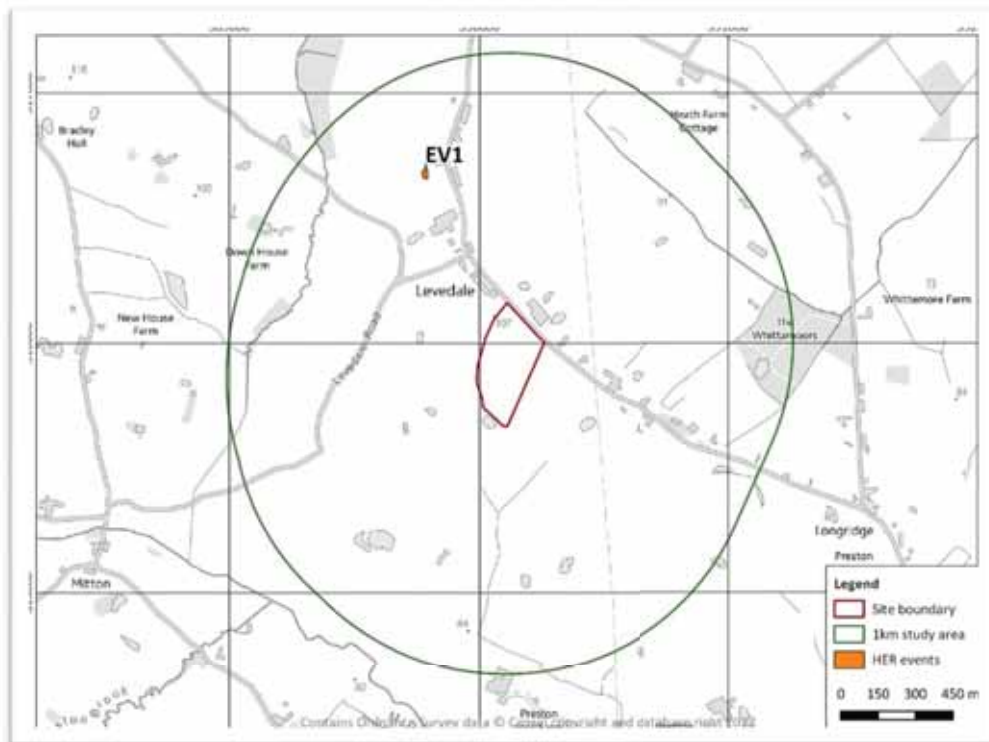


Image 5: Distribution of events in 1km study area

- 5.8. A single archaeological or heritage study, referred to as an ‘event’, is recorded by the HER within the 1km study area (Image 5, EV1), referring to an archaeological watching brief maintained during works at Field House Cottage situated some 600m north of the Site.
- 5.9. A number of features were recorded, including post holes, a 17th century pit, a stone-lined well dating to at least the 18th century, and a 19th century dump layer (Henshaw 2009).

Prehistoric (pre-43CE) and Romano-British (43CE-410CE)

- 5.10. The HER hold very limited evidence for prehistoric activity in the study area, comprising a single record of the findspot of a cast copper alloy spearhead of probable Middle Bronze Age date, found with a metal detector (Image 6, 3).

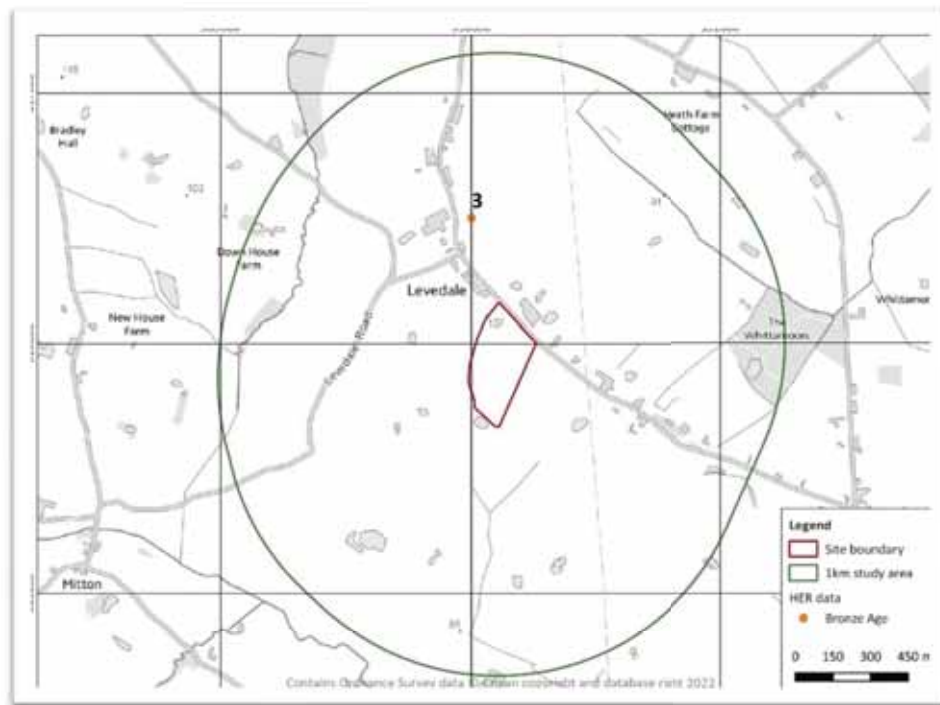


Image 6: Prehistoric sites and features in 1km study area

- 5.11. It is assessed that the potential for prehistoric finds or features at the Site is low, with any material identified most likely to comprise stray finds.
- 5.12. There is no record in the HER for any sites or finds relating to the Romano-British period from the study area. It is assessed that the potential for such material to be present at the Site is very low.

Early medieval (410CE-1066CE) to late medieval (1066-1529)

- 5.13. The name Penkridge is associated with a 4th century Roman settlement in the area known as *Pennocrucium*. A manor is first recorded in the Domesday Book of 1086 as *Pancriz*, the place name deriving from the Celtic-British words *penn* and *crūg*, translating broadly to ‘Tumulus on a headland’ (Mills 2003).
- 5.14. Domesday records the manor in two separate entries. The first records one hide of land held by King William with the second entry recording one hide of land held by the Clerks of Wolverhampton (Williams & Martin 1992).

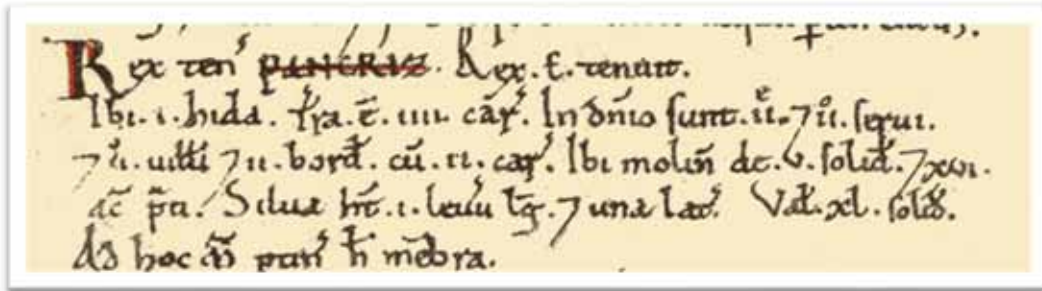


Image 7: First Domesday Book entry for Penkridge (Pancriz)

- 5.15. The hide was a medieval unit of land measurement which originally represented an amount of land sufficient to support a household, traditionally recognised as c. 12ha or 30 modern acres. The hide is better expressed as a measure of value and tax assessment, and different properties with the same hidage could vary greatly in extent even in the same county.
- 5.16. The HER includes a single early medieval record comprising the position of the now lost settlement of Levedale which is recorded in the Domesday Book (Image 8, 8; Image 9).

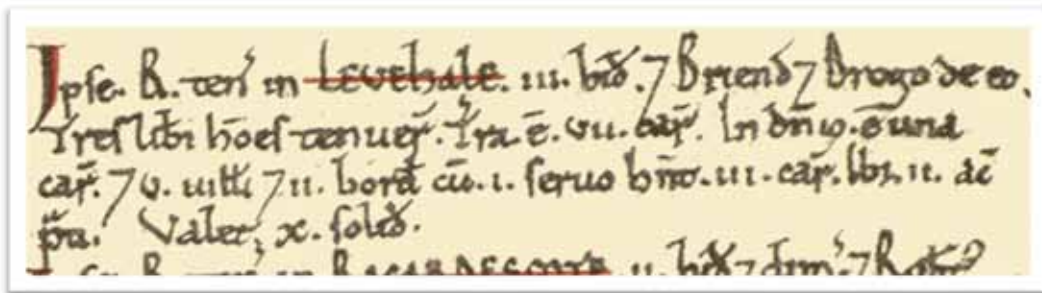


Image 8: Domesday Book entry for Levedale (Levehale)

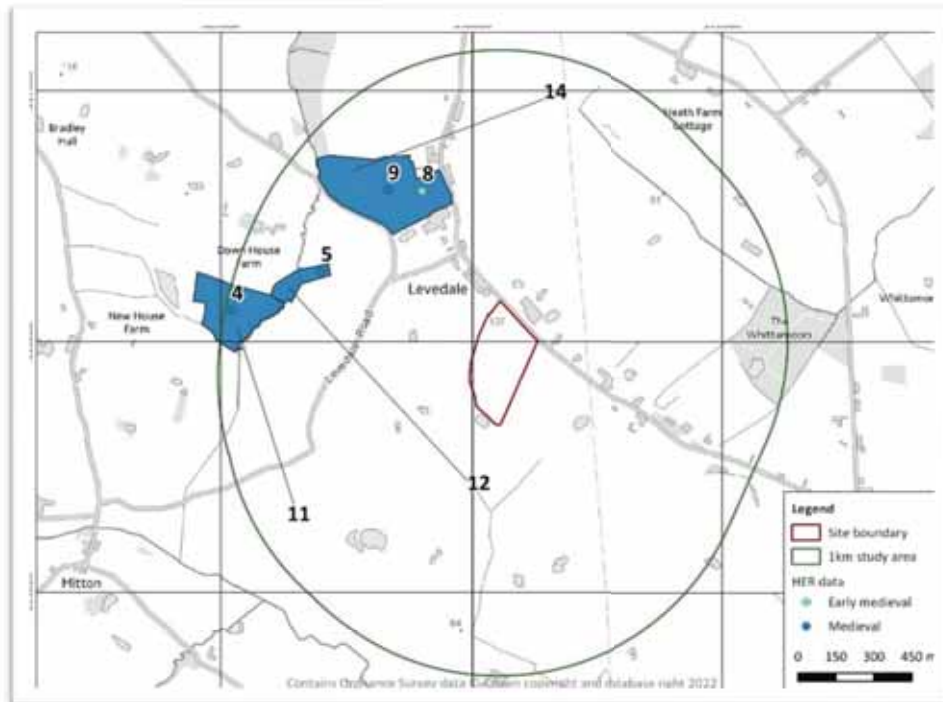


Image 9: Early medieval and medieval sites and features in 1km study area

- 5.17. Evidence for medieval activity is recorded across three areas to the west and northwest of the Site (Image 9; 11, 12, 14). Two of the areas refer to remnant ridge and furrow earthworks, evidence for medieval agricultural practice.
- 5.18. The third area identified refers to the Downe Moated Site (Image 9, 12), comprising the earthwork remains of a potential moated site and fishpond. It has been suggested that this site may be that referred to as 'The Downes', recorded as the home of Sir Edward Littleton in the early 17th century (Hammer 1974).
- 5.19. A second moated site is recorded c. 1.11km north of the Site at Hay House. This site is protected as a Scheduled Monument (Image 4, SM1) and is of probable late medieval date.
- 5.20. It is assessed that the potential for medieval finds and features at the Site is low. If present remains will most likely relate to agricultural practice of the period, potentially stray finds associated with manuring, remnant ridge and furrow or former field boundaries.

Post-medieval (AD1540 to AD1900)

- 5.21. The HER records limited evidence for post-medieval activity in the study area.
- 5.22. Longridge Farm situated some 470m east of the Site comprises an early 19th century model farm which formerly was part of the Littleton Estate (Image 10, 10; Peters 1969). Longridge House is a Grade II* Listed Building (Image 4, LB7).

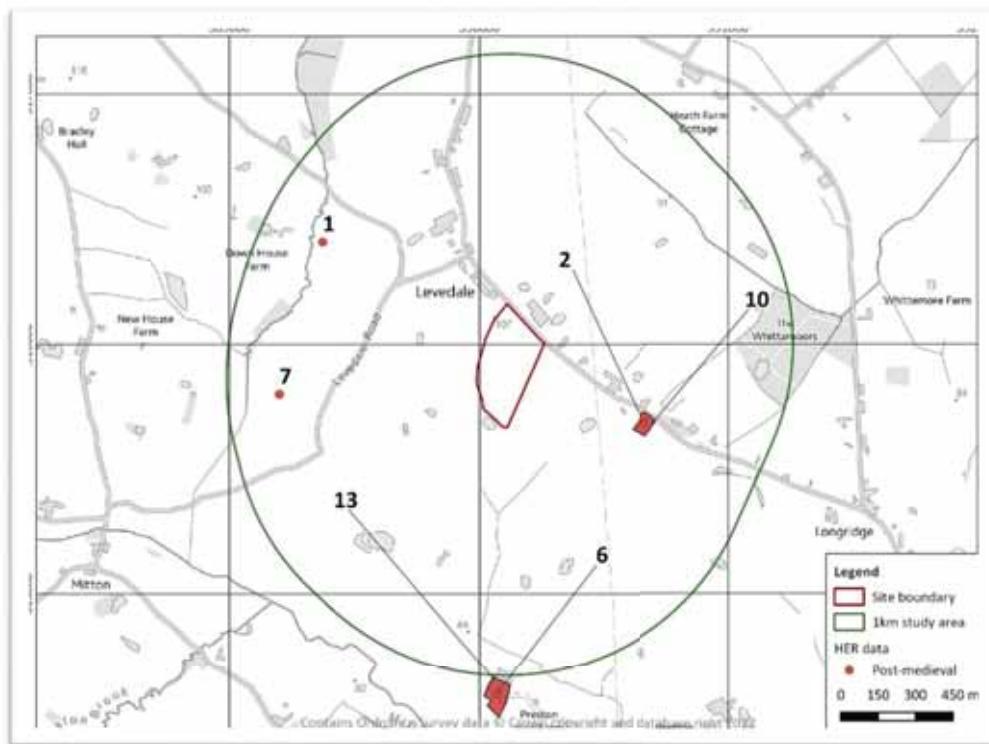


Image 10: Post-medieval sites and features in 1km study area

- 5.23. Around 1km south of the Site is Preston Vale Farm (Image 10, 13), a large courtyard farmstead which dates to at least the late 18th century (Edwards 2008).
- 5.24. Other evidence relates to the findspot of a ring (Image 10, 7) and documentary evidence for the location of a post-medieval Chapel of Rest (Image 10, 1).

- 5.25. The potential for archaeological remains, beyond boundary features and stray finds, is considered low. Any remains identified are likely to relate to post-medieval agricultural practice.
- 5.26. Further data on the historical development of the Site and its environs is included in the historic map regression section below.

Historic map regression: the developmental history of the Site

1817 Robert Dawson - Penkridge



Image 11: 1817 Robert Dawson - Penkridge

- 5.27. Robert Dawson's hand drawn early 19th century survey of the Penkridge area shows the Site with the access road to its west as a single field unit. No development is evident at the Site.

1883 Ordnance Survey County Series 1:2,500

- 5.28. The first edition OS map illustrates changes to the field layout at the Site since 1817, with a northeast-southwest boundary in the North Field just within the Site boundary at that point. The boundary between the North and South Fields is established by this time.
- 5.29. A number of waterbodies in the area represent former marl pits, with several named as such. One pit is located close to the east boundary of the South Field within the Site whilst another lies at the southern boundary of the same field.



Image 12: 1883 Ordnance Survey County Series 1:2,500

1902 Ordnance Survey County Series 1:2,500



Image 13: 1902 Ordnance Survey County Series 1:2,500

- 5.30. By the turn of the 20th century little obvious change is apparent at the Site since the issue of the first edition OS.

1923 Ordnance Survey County Series 1:2,500

- 5.31. By the early 1920s, no boundary change or development is evident at the Site.

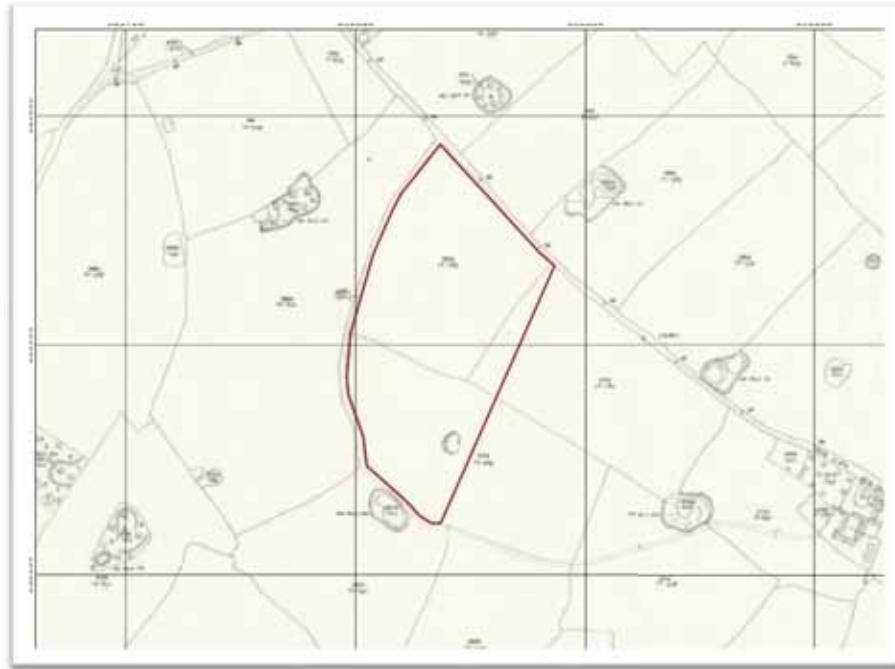


Image 14: 1923 Ordnance Survey County Series 1:2,500

Later maps

- 5.32. The remainder of the 20th century saw no significant change or development at the Site, beyond the removal of the northeast-southwest boundary in the wider North Field.

Historic Landscape Character

The Historic Landscape Characterisation (HLC; Image 15) for Staffordshire records the Site under the HLC designation *Reorganised Piecemeal Enclosure* over a period described as *Post-1914 to Post-War*.

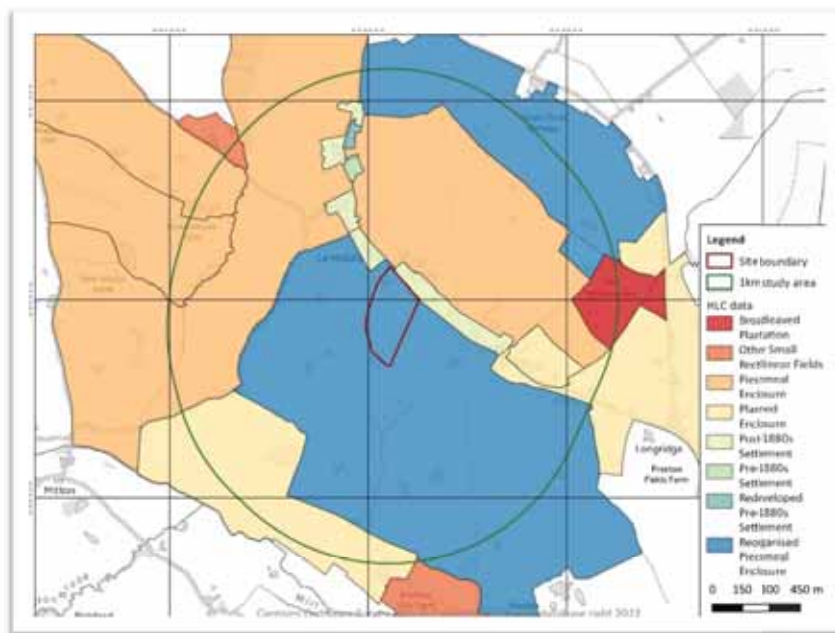


Image 15: Historic Landscape Character

Satellite imagery

- 5.33. The modern Google Earth sequence covers the period 2003 to 2022. By 2003, the layout of fields at the Site is at it is today. This image shows linear soil marks largely in the north of the Site with their regularity and orientation strongly suggesting they are former field boundaries. The now infilled former extraction pit in the South Field is evident as a soil mark.

6. ASSESSMENT OF SIGNIFICANCE

Introduction and scoping

- 6.1. Initial desk based studies, confirmed by the site visit, identified no heritage assets whose settings were considered to be at risk of harm as a result of the proposed development.

Buried archaeology

- 6.2. A generally low potential for the presence of significant buried archaeology at the Site has been assessed. This is true for remains of all periods.
- 6.3. HER data and historic map evidence strongly suggests that, beyond evidence of former field boundaries in the north and post-medieval clay extraction in the south, any archaeological material present at the Site will most likely represent stray finds. Potential finds and/or features are considered most likely to be of local importance.

Historic Landscape Character

- 6.4. The HLC of the Site is recorded as *Reorganised Piecemeal Enclosure* over a date range of *Post-1914 to Post-War*.
- 6.5. The reorganisation of field boundaries at the Site through the 20th century is evident in historic maps and it is considered that the archaeological and historical value of the HLC at the Site is minor.

7. ASSESSMENT OF IMPACT

Planning proposal

- 7.1. The planning proposal comprises the development of a 49.9MW Battery Storage Scheme (BESS) at the Site, with associated infrastructure, compounds (during construction), security fencing and CCTV.
- 7.2. The indicative plan shown in Image 16 illustrates the wider land ownership boundary (purple), the redline developable area, the existing pylon alignment (green), and the proposed area for battery storage development (cyan).

Previous impacts

- 7.3. The Site forms a small area within a larger swathe of agricultural land. Historically the land appears to have been farmed since the 19th century.
- 7.4. The only impact of any significance found in the historical cartographic records is a clay extraction pit in the South Field, now infilled. There is a high probability that numbers of smaller extraction pits may exist across the Site.



Image 16: Indicative proposal plan

Buried archaeology

- 7.5. The potential for significant buried archaeology at the Site has been assessed as generally low in respect of all archaeological periods. The proposed development, including compounds, fencing, security lighting and CCTV, and cable and access routes, has the capacity to disturb archaeological deposits where present.

8. CONCLUSION

- 8.1. Initial desk based studies identified no designated heritage assets whose settings were considered to be at risk of harm as a result of the proposed development. This was confirmed during the site visit.
- 8.2. The Site represents a relatively small area within a larger swathe of agricultural land west of Penkridge. Historically the land has farmed since at least the 19th century, with later boundary changes evident through study of historic maps. The only impact of any significance found in the historical cartographic records is a clay extraction pit in the South Field, now infilled. It has been concluded that there is a high probability that numbers of smaller extraction pits may exist across the Site.
- 8.3. The potential for significant buried archaeology at the Site has been assessed as low in respect of all archaeological periods. The proposed development, including compounds, fencing, security lighting and CCTV, and cable and access routes, has the capacity to disturb archaeological deposits where present. Any finds and/or features present at the Site are considered most likely to be of local importance.
- 8.4. The UK Government is committed to the country becoming carbon neutral by 2050 and fully decarbonising the energy sector by 2035. The provision of renewable energy in all its forms is integral to meeting this target.

- 8.5. This assessment has been completed with due regard to the revised NPPF, the PPG, the South Staffordshire Core Strategy, and guidance issued by Historic England and the ClfA.

9. SOURCES AND REFERENCES

Written Sources

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British History Online
Google Earth
Heritage Gateway
National Archives
National Heritage List for England
South Staffordshire District Council

Appendix 1: Gazetteer of heritage assets

FIG. REF.	HE/HER REF.	NAME	TYPE	PERIOD	SUMMARY	STATUS	EAST	NORTH
Designated Sites and Monuments (Historic England data: 2km study area)								
Scheduled Monuments (2km study area)								
SM1	1011055	Hay House moated site	Moat	Medieval	Although only partly visible on the ground, the moated site at Hay House is largely unencumbered by modern development.	SM	390809	317050
Listed Buildings (2km study area)								
LB1	1039194	Preston Vale Farmhouse	Farmhouse	Post-medieval	Farmhouse. Early C18 with later alterations and additions.	II	390084	314570
LB2	1039224	Field House Farmhouse	Farmhouse	Post-medieval	Farmhouse. Late C18 with later alterations.	II	389882	316454
LB3	1188122	Preston Hill Farmhouse	Farmhouse	Post-medieval	Farmhouse. Late C18 with later alterations.	II	390974	314573
LB4	1188124	Barn And Attached Engine House Approximately 30 Yards North Of Preston Vale Farmhouse	Barn and engine house	Post-medieval	Barn and engine house. Late C18 barn with mid-C19 engine house and later alterations.	II	390105	314617
LB5	1239921	Lower Mitton Road Bridge	Bridge	Post-medieval	Bridge, c1810.	II	388503	315260
LB6	1294819	Whiston Hall	House	Post-medieval	House. C17 with later alterations and additions.	II	389232	314498
LB7	1294998	Longridge House	Inn	Post-medieval	House, now nursing home. Late C18 with later alterations and addition.	II	390672	315711
LB8	1295025	Levedale House	Farmhouse	Post-medieval	Farmhouse. c.1800 with later alterations.	II	389920	316640
LB9	1374105	Hay House Farmhouse	Farmhouse	Post-medieval	Farmhouse. c.1800	II	390811	317056

LB10	1374107	Pear Tree Farmhouse And Attached Agricultural Buildings	Farmhouse	Post-medieval	Farmhouse, barn and stables. Early to mid-C18 with later alterations.	II	388723	314318
LB11	1374110	Lower Mitton Farmhouse	Farmhouse	Post-medieval	Farmhouse. Early C18 with early and mid-C19 additions	II	388463	315194
LB12	1390986	Whiston Mill	Mill	Post-medieval	Mill and millhouse. Random bond red brick with a plain tiled roof. Three storeys.	II	390086	314241
Staffordshire HER data (1km study area)								
1	1027	Chapel of Ease, Levedale	Chapel Of Ease	Post-medieval	Documentary evidence for the site of a chapel of ease (possibly called St Laurence) in the 16th century. No mention of the chapel is made after 1563 and no remains of a 16th century or earlier chapel now survive within Levedale.	n/a	389373	316409
2	51816	Longridge Farm, Penkridge	Model Farm	Post-medieval	An early nineteenth century model farm complex that once formed part of the Littleton Estate.	n/a	390664	315683
3	60467	Spearhead Findspot, Penkridge	Findspot	Bronze Age	A cast copper alloy socketed and side looped spearhead of probable Middle Bronze Age date, found with a metal detector in Penkridge Parish before October 2005.	n/a	390000	316500
4	53560	Ridge and Furrow, Down House Farm, Bradley	Ridge And Furrow	Medieval	Medieval ridge and furrow identified as earthworks on aerial photography from the 1960s in the Down House Farm area of Bradley.	n/a	389043	316124

5	2001	The Downe Moated Site, Bradley	Moat	Medieval	The earthwork remains of a possible moated site and fishpond. Possibly the site referred to as 'The Downes' which is recorded as the home of Sir Edward Littleton in the early 17th century.	n/a	389398	316279
6	58244	Preston Vale Farm, Penkridge	Farmstead; Regular Courtyard Plan; L Shape Plan; Orchard	Post-medieval	A large regular courtyard farmstead with an L-plan element and working buildings to four sides of the working yard. The farmhouse is detached and there are a number of other historic detached working buildings.	n/a	390069	314592
7	61496	Finger Ring Findspot, Penkridge	Findspot	Post-medieval	A gold finger ring of probable 17th century date, inscribed with a makers mark and the words 'Love & Live Happy'. Recovered during metal detecting in Penkridge parish in June 2019.	n/a	389200	315800
8	2497	Levedale / Levehale (Settlement)	Settlement	Early medieval	A settlement recorded in the Domesday survey of 1086 as having 5 villagers.	n/a	389800	316600
9	20734	Ridge and Furrow, Down House Farm, Bradley	Ridge And Furrow	Medieval	Medieval ridge and furrow identified as earthworks on aerial photography from the 1960s in the Down House Farm area of Bradley.	n/a	389664	316604
10	51816	Longridge Farm, Penkridge	Model Farm	Post-medieval	An early nineteenth century model farm complex that once formed part of the Littleton Estate.	n/a	390663	315679
11	53560	Ridge and Furrow, Down House Farm, Bradley	Ridge And Furrow	Medieval	Medieval ridge and furrow identified as earthworks on aerial photography from the 1960s in the Down House Farm area of Bradley.	n/a	389048	316128

12	2001	The Downe Moated Site, Bradley	Moat	Medieval	The earthwork remains of a possible moated site and fishpond. Possibly the site referred to as 'The Downes' which is recorded as the home of Sir Edward Littleton in the early 17th century.	n/a	389308	316238
13	58244	Preston Vale Farm, Penkridge	Farmstead; Regular Courtyard Plan; L Shape Plan; Orchard	Post-medieval	A large regular courtyard farmstead with an L-plan element and working buildings to four sides of the working yard. The farmhouse is detached and there are a number of other historic detached working buildings. The complex dates to at least the late 18th	n/a	390071	314587
14	20734	Ridge and Furrow, Down House Farm, Bradley	Ridge And Furrow	Medieval	Medieval ridge and furrow identified as earthworks on aerial photography from the 1960s in the Down House Farm area of Bradley.	n/a	389648	316608
Staffordshire HER Events data (1km study area)								
EV1	EST2028	Field House Cottage, Levedale Road, Levedale	Watching Brief	n/a	An archaeological watching brief at Field House Cottage, Levedale Road, Levedale, June 2009. (NRHE Name - Field House Cottage, Levedale Road)	n/a	389783	316681

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