



Keuper Gas Storage Project

Preliminary Environmental
Information Report – Cultural Heritage

PREPARED FOR
Keuper Gas Storage
Limited

DATE
September 2025

REFERENCE
EN0310001



DOCUMENT DETAILS

DOCUMENT TITLE	Keuper Gas Storage Project
DOCUMENT SUBTITLE	Preliminary Environmental Information Report – Cultural Heritage
PROJECT NUMBER	EN0310001
DATE	September 2025
VERSION	1.0
AUTHOR	ERM
CLIENT NAME	Keuper Gas Storage Limited

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
CAPAS	Cheshire Archaeology Planning Advisory Service
CIfA	Chartered Institute for Archaeologists
DCO	Development Consent Order
DBA	Desk Based Assessment
DSM	Digital Surface Model
DTM	Digital Terrain Mode
EIA	Environmental Impact Assessment
ERM	Environmental Resources Management
ES	Environmental Statement
HER	Historic Environment Record
HLC	Historic Landscape Characterisation
KGSL	Keuper Gas Storage Limited

Acronym	Description
KGSP	Keuper Gas Storage Project
MC	Material Change
NHLE	National Heritage List for England
NPPF	National Planning Policy Framework
NPS	National Policy Statement
PEIR	Preliminary Environmental Information Report
PPG	Planning Practice Guidance
SM	Scheduled Monument
WHS	World Heritage Site

12. CULTURAL HERITAGE

12.1 INTRODUCTION

12.1.1.1 This chapter of the Preliminary Environmental Information Report (PEIR) assesses the effects of the Proposed Development with respect to cultural heritage. The chapter provides a review of the policy; assessment methodology and criteria; baseline conditions and mitigation measures for assessment as well as an assessment of likely effects. This chapter also details where assessment deviates from that presented in the ES for the Consented Development.

12.1.1.2 This chapter is supported by **Appendix 12A, Historic Environment Desk-Based Assessment** and the prior assessment presented in the Consented Development Desk-Based Assessment and ES Chapter¹.

12.2 LEGISLATION, POLICY AND GUIDANCE

12.2.1.1 This assessment considers key legislation, planning policy and guidance that are relevant to the Proposed Development and is supplementary to those presented in the ES for the Consented Development.

12.2.1.2 For further detail regarding planning policy and the general legislative context of the Proposed Development, please refer to **Chapter 5, Planning and Policy Context**.

12.2.2 LEGISLATION

12.2.2.1 The following legislation is relevant to the Proposed Development:

Hedgerow Regulations (1997)²

12.2.2.2 The Hedgerow Regulations (1997) have no bearing on determinations of heritage 'significance' or 'impact' within the planning system. They are a triggering mechanism for notifying the Local Planning Authority (LPA) of the intended alteration or removal of any hedgerows classified as 'important'; such classification is to be determined with reference to a list of criteria appended to the regulations.

12.2.2.3 In the DCO context, a DCO can include consent to alter or remove important hedgerows and identification of them at the pre-application stage is required to allow such inclusion to be considered in the DCO determination.

¹ ERM (2015) Cultural Heritage Annex A: Desk-Based Assessment. DCO Document Reference 6.2: Environmental Statement Technical Annexes.

² UK Government (1997). The Hedgerows Regulations 1997. Available online at: <https://www.legislation.gov.uk/uksi/1997/1160/contents/made>

Planning (Listed Buildings and Conservation Areas) Act (1990)³

12.2.2.4 Section 66(i) of the Act states that:

"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."

12.2.2.5 With regards to development within a Conservation Area, Section 72(1) of the Act (1990) provides that:

"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

12.2.2.6 Unlike Section 66(1), Section 72(1) of the Act does not refer to the setting of a Conservation Area. It is the character and appearance of the Conservation Area that is subject to the statutory provision. Harm resulting from changes to the setting of Conservation Areas is provided for under national policy (NPPF 2023).

Ancient Monuments and Archaeological Areas Act (1979)⁶

12.2.2.7 Scheduled monuments are protected from physical impact under the 1979 Act stipulates that a grant of scheduled monument Consent is required from the SoS for any works that would physically affect a scheduled monument.

12.2.2.8 The 1979 Act does not provide statutory protection for the settings of scheduled monuments. The settings of scheduled monuments are protected under national and local policy, and applications for works that would affect the settings of scheduled monuments are considered within that policy context.

Infrastructure Planning (Decisions) Regulations (2010)⁴

12.2.2.9 EN-1 (paragraph 5.9.23) provides the following:

"The Secretary of State must also comply with the requirements on listed buildings, conservation areas and scheduled monuments, set out in Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010."

³ UK Government (1990). Planning (Listed Buildings and Conservation Areas) Act 1990. Available online at: <https://www.legislation.gov.uk/ukpga/1990/9/contents>.

⁴ UK Government, Infrastructure Planning (Decisions) Regulations [Online] <https://www.legislation.gov.uk/uksi/2010/305/contents/made>

12.2.2.10 Regulation 3 provides as follows:

- (1) When deciding an application which affects a listed building or its setting, the decision-maker(1) must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.
- (2) When deciding an application relating to a conservation area, the decision-maker must have regard to the desirability of preserving or enhancing the character or appearance of that area.
- (3) When deciding an application for development consent which affects or is likely to affect a scheduled monument or its setting, the decision-maker must have regard to the desirability of preserving the scheduled monument or its setting.
- Clauses (1) and (2) of Regulation 3 are broadly equivalent to sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, as applicable to applications determined under the Town and Country Planning Act.⁵
- Physical protection of scheduled monuments is provided under the Ancient Monuments and Archaeological Areas Act (1979). However, the 1979 Act does not provide statutory protection for the setting of scheduled monuments, and, in doing so, Regulation 3(3) provides a higher level of statutory protection for scheduled monuments.

12.2.3 NATIONAL POLICY

National Policy Statements for Energy Infrastructure (2024)⁶

12.2.3.2 The energy National Policy Statements (NPS), EN-1 – EN-6, outline the government’s policy for delivering major energy infrastructure. The NPS that are of relevance to the Proposed Development are:

- the Overarching NPS for Energy (EN-1) (2023)⁷; and
- the NPS for Natural Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4) (2023)⁸.

12.2.3.3 NPS EN-1 – EN-5 were revised in 2023 and the revised versions came into force on 17 January 2024. NPS (EN-1) sets out the overarching need case and general assessment principles for

⁵ UK Government (1990) Planning (Listed Buildings and Conservation Areas) Act 1990. Available at <http://www.legislation.gov.uk/ukpga/1990/9/contents>

⁶ UK Government (1979) Ancient Monuments and Archaeological Areas Act 1979. Available at: <https://www.legislation.gov.uk/ukpga/1979/46>,

⁷ Department of Energy Security and Net Zero, 2023. Overarching National Policy Statement for Energy (EN-1). Available online at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>.

⁸ Department of Energy Security and Net Zero, 2023. Overarching National Policy Statement for Energy (EN-1). Available online at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>.

energy. In particular, paragraphs 4 – 9 detail the approach to the historic environment and measures that should be implemented to mitigate risk.

- 12.2.3.4 EN-1 paragraph 4.7.2 states: “Applying “good design” to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage”
- 12.2.3.5 EN-1, paragraph 5.9.1 states: “The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground.”
- 12.2.3.6 EN-1, paragraph 5.9.5 states: “There are heritage assets that are not currently designated, but which have been demonstrated to be of equivalent significance to designated heritage assets of the highest significance.”
- 12.2.3.7 EN-1, paragraph 5.9.6 states: “Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets. The absence of designation for such heritage assets does not indicate lower significance.”
- 12.2.3.8 EN-1, paragraph 5.9.7 states: “The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan making process by plan-making bodies, including ‘local listing’, or through the application, examination and decision making process).”
- 12.2.3.9 The remainder of EN-1, paragraph 5 details the level of reporting that should be undertaken to support applications.
- 12.2.3.10 NPS (EN-4) sets out the general assessment principles for gas supply and gas and oil pipeline.

The National Planning Policy Framework (NPPF) (2024)⁹ and Planning Practice Guidance (2019)¹⁰

- 12.2.3.11 The National Planning Policy Framework (NPPF) (Section 16 – Conserving and Enhancing the Historic Environment) and its supporting guidance in the Planning Practice Guidance (PPG) – Historic Environment provide up to date overarching national planning policy with regard to the assessment of harm to heritage assets.
- 12.2.3.12 Paragraph 213 of the NPPF introduces the concept that heritage assets can be harmed or lost through alteration, destruction or

⁹ UK Government National Planning Policy Framework (2024) [Online]
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹⁰ UK Government, Planning Practice Guidance (2019)
<https://www.gov.uk/government/collections/planning-practice-guidance>

development within their setting and identify that this harm ranges from less than substantial through to substantial.

12.2.3.13 Paragraph 214 of the NPPF has a direction to refuse consent where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset *"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 of the following apply:*

- a. the nature of the heritage asset prevents all reasonable uses of the site;
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use."

12.2.3.14 Paragraph 215 of the NPPF relates to instances of 'less than substantial harm' to designated assets, and states that:

"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."

12.2.3.15 Paragraph 216 of the NPPF relates to non-designated heritage assets, and states that:

"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."

12.2.4 LOCAL PLANNING POLICY

The Cheshire West and Chester Local Plan (2015)¹¹

12.2.4.2 The Cheshire West and Chester Local Plan sets out the plans and objectives for the local area, as adopted in 2015. In particular, policy SO12 of the Local Plan is relevant to the development and aims to *"Ensure new development is of sustainable and high quality*

¹¹ Cheshire West and Chester Council (2015) Cheshire West and Chester Local Plan (Part One) Strategic Policies. Available at: <https://consult.cheshirewestandchester.gov.uk/kse/event/24907>

design that respects heritage assets, local distinctiveness and the character and appearance of the landscape and townscape.”

12.2.5 GUIDANCE

12.2.5.1 This assessment takes into consideration industry best practice and guidance to the extent they are relevant for the Proposed Development. These include:

- National Planning Policy Framework (Section 16 - Conserving and Enhancing the Historic Environment) (2024)¹²;
- Planning Practice Guidance (PPG) – Historic Environment (July 2019)¹³;
- Countryside Hedgerow Protection Guidance – Removing Hedgerows (September 2024)¹⁴;
- Chartered Institute for Archaeologists (CIfA) guidelines: Standard and guidance for archaeological desk-based assessment (Revised 2020)¹⁵;
- Chartered Institute for Archaeologists (CIfA) (2014) Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment¹⁶;
- English Heritage (2008) Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment¹⁷;
- Historic England (2015) Historic Environment Good Practice Advice In Planning Note 2: Managing Significance In Decision-Taking In The Historic Environment¹⁸;
- Historic England (revised 2017) Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets¹⁹;

¹² [1] UK Government (2024) National Planning Policy Framework. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

¹³ UK Government, Planning Practice Guidance (PPG), available at <https://www.gov.uk/government/collections/planning-practice-guidance>

¹⁴ UK Government (2002) Hedgerow Regulations 2002 (As Amended). Available at: <https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>

¹⁵ Chartered Institute for Archaeologists (revised 2020). Standard and guidance for historic environment desk-based assessment, updated 2020. Available at: https://www.archaeologists.net/sites/default/files/CIfAS%26GDBA_4.pdf

¹⁶ Chartered Institute for Archaeologists (2014) Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment. Available at: https://www.archaeologists.net/sites/default/files/CIfAS&GCommissioning_1.pdf

¹⁷ English Heritage (2008) Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment. Available at: <https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/conservationprinciplespoliciesandguidanceapril08web/>

¹⁸ Historic England (2015) Historic Environment Good Practice Advice. In Planning Note 2: Managing Significance. In Decision-Taking in the Historic Environment [Online] <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>

¹⁹ Historic England (revised 2017) Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets [Online] <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

- Historic England (2016) Preserving Archaeological Remains Decision-taking for Sites under Development²⁰;
- Historic England (2019) Statements of Heritage Significance²¹;
- IMEA (2021) Principles of Cultural Heritage Impact Assessment in the UK²²; and
- UK Government, Environmental Impact Assessment (2017)²³

12.3 CONSULTATION

12.3.1 EIA SCOPING

12.3.1.1 The following consultation was conducted as part of the pre-application process for the DCO, submitted in 2015:

- the Scoping Opinion;
- follow-up consultation with Historic England regarding the assessment of impacts on the setting of cultural heritage assets; and
- consultation with appointed contacts for cultural heritage within Cheshire West and Chester Council; and consultation on the PEIR.
- Following consultation, four sensitive areas were identified with regards to cultural heritage and archaeology:
 - West of Drakelow Moated Site;
 - East of King Street Roman Road;
 - South of 'Street Field'; and
 - 'Brick Kiln Field'.

12.3.1.2 Historic England recommended a phased programme of investigation consisting of:

- geophysical survey and archaeological evaluation in the areas which would be disturbed by the construction of access tracks and pipelines (especially in areas of high archaeological potential);
- incorporation of monitoring and recording of historic hedgerow boundaries; and
- marking of a buffer zone around the boundary of the scheduled site, in order to avoid inadvertent damage by construction machinery.

²⁰ Historic England (2016) Preserving Archaeological Remains Decision-taking for Sites under Development [Online] <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/heag100a-preserving-archaeological-remains/>

²¹ Historic England (2019) Statements of Heritage Significance [Online] <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/heag279-statements-heritage-significance/>

²² IMEA (2021) Principles of Cultural Heritage Impact Assessment in the UK (Online) https://files.clickdimensions.com/iemanet-ay0ig/files/j30361_iema_principlesofchia_v8.pdf?1626095514392

²³ 33 UK Government, Environmental Impact Assessment, Available at: <https://www.gov.uk/guidance/environmental-impact-assessment>

- 12.3.1.3 Additionally, the following mitigation was recommended by Cheshire West and Chester Council:
- erection of high visibility sheet fencing around Drakelow Moated Site as a preventative measure designed to ensure that there is no encroachment during the construction of wellhead H508; and
 - incorporating cut sections of hedgerows into the watching brief.
- 12.3.1.4 A formal Scoping Opinion for the Proposed Development was received from the Planning Inspectorate on the 5th of June 2025; the response reaffirmed the need for the previously outlined archaeological evaluation and mitigation measures and no further comments regarding cultural heritage were received.
- 12.3.1.5 The following key organisations will be consulted with throughout the design and assessment of the Proposed Development with regard to cultural heritage:
- Cheshire West and Chester Borough Council; and
 - Historic England.
- 12.3.1.6 The outcomes of any further consultation on cultural heritage will be reported in the ES.

12.3.2 RECOMMENDATIONS FOLLOWING CONSENT

- 12.3.2.1 In 2016, recommendations were made by the Secretary of State for Business, Energy and Industrial Strategy, following consent of the development²⁴. The response regarding cultural heritage stated *"...the main impacts would be on historic hedgerows and on the remains of ridge and furrow field systems with four areas of archaeological sensitivity identified."* The conclusion was that if proposed mitigation is implemented, no significant harm to heritage assets is expected.

12.3.3 RECOMMENDATIONS FOLLOWING NON-MATERIAL AMENDMENT

- 12.3.3.1 In 2022, a response was received from Historic England with regard to the Non-Material Change application²⁵. The conclusion from Historic England at this time were that that the proposed physical changes to the Site would not introduce any new or different impacts on the cultural heritage resource.

12.4 BASIS OF THE ASSESSMENT

- 12.4.1.1 **Chapter 2, Proposed Development Description** presents a summary of the currently available design information for the

²⁴ The Planning Inspectorate (2016), Examining Authority's Report of Findings, Conclusions and Recommendation to the Secretary of State for Business, Energy and Industrial Strategy. Available at: <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN030002-001272-Keuper%20Gas%20Storage%20ExA%20Recommendation%20Report.pdf>

²⁵ Historic England (2022), KeuperGSP Project - Non-Material Change 1 EN030002, Available at: <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN030002-001570-Historic%20England.pdf>

Proposed Development that has been used to inform this assessment.

- 12.4.1.2 The land within which the Proposed Development is located occupies approximately 352 hectares (ha), as is illustrated by **Figure 2.1, Site Location**. The Proposed Development involves the change from gas storage to hydrogen storage and whilst the majority of the proposed works remain the same as the Consented Development, a number of design changes are required to support this amendment as set out in **Chapter 2, Proposed Development Description**.
- 12.4.1.3 Amendments to the Consented Development to be implemented at construction phase that require cultural heritage assessment include:
- amendments to the Gas Processing Plant (GPP);
 - addition of an elevated flare (approximately ~50 m high, ~2 diameter) and enclosed ground flare;
 - changes to site infrastructure location;
 - changes to building size (10-15 m); and
 - amendments to access roads.

12.4.2 CONSTRUCTION

- 12.4.2.1 Amendments to the GPP include expansion of the plant eastward which brings it within closer proximity to Drakelow Moated Site. This increases the risk of disturbing any associated buried remains that may be located to the west of the asset as outlined in the Consented Development Desk Based Assessment (DBA) and ES. This extension eastwards also increases the potential for interaction with the setting of this designated asset. The footprint of the area covered by the GPP is also larger and extends further within the area to the east of King Street, another area of archaeological sensitivity highlighted in the Consented Development DBA and ES.
- 12.4.2.2 Changes to the GPP detailed in Section 12.4.1.3 may increase the risk of direct impacts to non-designated assets within the Site and unknown buried archaeological remains.
- 12.4.2.3 Potential effects on buried archaeology will be introduced as soon as surface ground is broken. Therefore, all soil stripping and levelling carried out as part of the construction works is included in this assessment to understand the potential for physical impacts to buried archaeology. This includes all topsoil and subsoil stripping within the Site, in relation to aspects detailed in section 12.4.1.3. Drainage and service trenches may also disturb ground below the level of soil stripping or outside of the areas in which soil stripping is proposed.

- 12.4.2.4 Excavations associated with the construction phase are considered in this assessment as groundwork activities that have the potential to truncate buried archaeological deposits and features.
- 12.4.2.5 Potential effects on buried archaeology can also be introduced when work begins on deeper excavations required for construction. This includes the construction of foundations (piled or otherwise) and foundations that may be required to support equipment foundation slabs.
- 12.4.2.6 Other enabling works and site preparation phase activities that can introduce potential effects on cultural heritage considered in this assessment include the movement and storage of heavy machinery and the storage of soil which can lead to compaction of buried archaeology. Changes in site drainage can affect the preservation of buried archaeology.
- 12.4.2.7 Direct impacts to non-designated assets as a result of the substation, access tracks and pipelines remain the same as that set out in the Consented Development ES.

12.4.3 OPERATION, MAINTENANCE AND DECOMMISSIONING

- 12.4.3.1 Potential impacts for the Operation, Maintenance and Decommissioning phases are anticipated to remain largely the same as reported in the Consented Development ES. However, as a result of the GPP extension, an increase in some building heights and the addition of the elevated flare and enclosed ground flare, there may be further effects on the setting of designated assets within the Study Area. Effects on setting are assessed further in Section 12.8.

12.5 ASSESSMENT METHODOLOGY

- 12.5.1.1 The approach taken to this PEIR is to review and crosscheck the earlier methodology set out in the Consented Development ES considering developments in policy, guidance and case law. Assessment methodology is the same as that presented in the Scoping Report and is aligned with the general framework set out in **Chapter 4, EIA Methodology and Consultation**.

12.5.2 SCOPE OF ASSESSMENT

- 12.5.2.1 Effects to be assessed consist of physical effects on a heritage asset, described here as 'physical effects', and effects upon the setting of a heritage asset, described here as 'effects on setting'. Effects can also be temporary, permanent, and cumulative, as explained below in the context of this assessment. These effects can be either adverse or beneficial.

12.5.3 PHYSICAL EFFECTS

- 12.5.3.1 Physical effects can occur during construction, operation (and maintenance) and decommissioning. Effects upon heritage assets

are considered, where sites or potential sites / buried archaeology are in danger of being altered, disturbed or destroyed.

- 12.5.3.2 Other physical effects considered include those related to dust and vibration generated by construction, operation and decommissioning activities that have the potential to physically alter the fabric of a heritage asset. Additionally, this assessment considers changes to a person's physical ability to access heritage assets.
- 12.5.3.3 Physical impacts have the potential to be one-off, non-reversible, and permanent. Unless the principle of avoidance is adopted in the first instance, mitigation measures may not significantly reduce the predicted residual effect of a physical impact²⁶.

12.5.4 EFFECTS ON SETTINGS

- 12.5.4.1 Effects on the settings of heritage assets can occur during construction, operation (and maintenance) and decommissioning.
- 12.5.4.2 The setting of a heritage asset is defined as: "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral"²⁷.
- 12.5.4.3 The primary concern regarding visual effects and their impact upon the settings of cultural heritage assets is the potential for the Proposed Development to fragment the historic landscape, separate connectivity between heritage assets and impinge on views to and from sites with important landscape settings.
- 12.5.4.4 Construction, operation, maintenance and decommissioning activities can also generate dust, noise and vibration that have the potential to change the setting of heritage assets. Potential effects on the setting of heritage assets are discussed in Section 12.7.

12.5.5 PERMANENT AND TEMPORARY EFFECTS

- 12.5.5.1 A permanent effect may occur as a result of the construction, operation and decommissioning of the Proposed Development. A permanent effect is not reversible and may (by definition) result in the permanent loss of, or harm to, a heritage asset, including as a result of adverse effects upon its setting.
- 12.5.5.2 Temporary effects may occur during the construction, operation, and decommissioning of the Proposed Development. A temporary effect is reversible, and by definition does not result in lasting loss

²⁶ Historic England guidance, Statements of Heritage Significance [Online] <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/heag279-statements-heritage-significance/>.

²⁷ UK Government, NPPF Annex 2, Glossary. Available online at <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

of significance of a heritage asset. Temporary effects include a change to the physical environment that can alter the setting of a heritage asset or a restriction of public access to an asset. This is most likely to occur during the construction phase when machinery and temporary works areas are in operation for a limited duration.

12.5.6 ELEMENTS SCOPED OUT OF ASSESSMENTS

- 12.5.6.1 Decommissioning will involve the use of similar equipment to the construction phase which may introduce temporary noise, dust and visual changes to the environment that have the potential to affect the settings of heritage assets. Decommissioning groundworks will be restricted to the same areas as construction phase groundworks and will therefore not introduce any further impacts on buried archaeology that may have been located there. Therefore, it is proposed that decommissioning of groundworks is scoped out.

12.5.7 STUDY AREA

- 12.5.7.1 The Study Area employed in this assessment consisted of the Proposed Development Site and a 250 m buffer in all directions which allowed the Proposed Development to be considered within its wider historical and archaeological context. This also enabled the identification of cultural heritage assets within the wider area whose setting may be affected by the Proposed Development.
- 12.5.7.2 Any other assets located beyond the Study Area as defined above thought relevant to establishing the historic landscape context or that are identified as potentially susceptible to impact, were also considered.

12.5.8 TEMPORAL SCOPE

- 12.5.8.1 In addition to considering the effects of construction resulting from the Proposed Development, the assessment will consider effects relating to potential impacts during operation and maintenance. The assessment assumes a baseline with current conditions as of 2025.

12.5.9 BASELINE SURVEY METHODOLOGY

- 12.5.9.1 A DBA and a Site walkover were completed and reported in the Consented Development ES. Due to the length of time that has passed since the Consented Development DBA in 2015, an updated DBA has been produced as part of the current assessment and is included in the current chapter as **Appendix 12A, Historic Environment Desk-Based Assessment**.
- 12.5.9.2 An additional phase of geophysical survey is currently being undertaken to support the current assessment with an expected completion date of September 2025. The results of this survey will be included in the forthcoming ES in support of the Proposed Development.

- 12.5.9.3 When the results of the geophysical survey are available, further consultation will be undertaken with the Cheshire Archaeology Planning Advisory Service (CAPAS).

12.5.10 DATA SOURCES

- 12.5.10.1 The desk-based research presented in **Appendix 12A, Historic Environment Desk-Based Assessment** and summarised within this chapter involved data collection, collation and analysis from the following sources:
- The National Heritage List for England (NHLE), for designated heritage asset data;
 - The Local Authority's Historic Environment Record (HER), for sites, events and Historic Landscape Characterisation (HLC) data;
 - Historic mapping, including large-scale county surveys, enclosure mapping, tithe mapping and early Ordnance Survey editions;
 - The Environment Agency's library of open access LiDAR data (DTM and DSM);
 - Historic England's Aerial Archaeology Mapping Explorer;
 - Historic England's Aerial Photograph Explorer, for historic vertical and oblique aerial imagery;
 - Google Earth timelapse satellite imagery;
 - Archival material from the county Records Office;
 - The Local Planning Authority's online planning application portal, for relevant documentation submitted in relation to proximate applications;
 - Grey literature relating to excavations within, and within proximity to, the Site;
 - Historic Landscape Characterisation data; and
 - Other relevant sources, including the British Geological Survey's online geological mapping, and Cranfield University's soil mapping.

12.5.11 METHODOLOGY FOR THE ASSESSMENT OF EFFECTS

Assessment of Heritage Significance

- 12.5.11.2 The significance of any susceptible heritage assets has been assessed, following the requirement in EN-1 Section 5.9.10, and taking account of HE's guidance on 'Managing Significance in Decision-Taking in the Historic Environment' (GPA2)²⁸.

²⁸ Historic England (2015) Managing Significance in Decision-Taking in the Historic Environment Historic Environment Good Practice Advice in Planning: 2 [Online] <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/>

12.5.11.3 Significance, in relation to heritage policy, is defined in the NPPF as:

"the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."

12.5.11.4 The NPPF glossary and the Planning Practice Guidance (PPG) provide that an asset's significance derives from its heritage 'interests', which the latter defines as follows:

12.5.11.5 Archaeological interest:

"As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point."

12.5.11.6 Architectural and artistic interest:

"These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture."

12.5.11.7 Historic interest:

"An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity."

12.5.11.8 Historic England's 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' (2019)²¹, also promotes the use of this terminology and methodology, which have therefore been adopted for the purposes of this PEIR. This approach allows for a detailed and justifiable determination of heritage significance and the interests from which that significance derives. In accordance with EN-1, the level of significance attributed to heritage assets as part of this assessment will be articulated as set out in **Table 12.1**.

TABLE 12.1 – HERITAGE SIGNIFICANCE

Significance	Description	Includes
The highest	<ul style="list-style-type: none"> Designated heritage assets of the highest significance (5.9.30 of EN-1); and Non-designated heritage assets of archaeological interest of demonstrably equivalent significance to Scheduled Monuments (EN-1, 5.9.6). 	<ul style="list-style-type: none"> World Heritage Sites Scheduled Monuments Grade I/II* Listed buildings Grade I/II* RPGs Protected Wreck Sites Registered Battlefields Certain Conservation Areas Some non-designated assets
Less than the highest	<ul style="list-style-type: none"> Designated heritage assets of less than the highest significance (EN-1, 5.9.29). 	<ul style="list-style-type: none"> Grade II Listed buildings Grade II RPGs All other Conservation Areas
Non-designated	<ul style="list-style-type: none"> As identified either through the development plan making process by plan-making bodies, including 'local listing', or through the application, examination and decision making process (EN-1, 5.9.7).[1] Non-designated remains considered to retain archaeological, architectural/artistic and/or historic interest, and therefore to be of significance. 	<ul style="list-style-type: none"> Non-designated buried archaeological remains Non-designated above ground archaeological remains (e.g., earthworks, ruins, standing stones) Non-designated historic buildings (including locally listed buildings) Non-designated historic landscape features

Magnitude of Impact (Level of Harm)

- 12.5.11.9 The adopted methodology for predicting magnitude of impact moves away from the more traditional 'scalar', matrix-led approach to assessment.
- 12.5.11.10 The adopted methodology is, instead, a qualitative approach. This is consistent with the provisions of EN-1, it refers to 'harm to significance'. This directly reflects key concepts in current planning policy and heritage guidance and allows for a less constrained and more reflective assessment of effects. This approach is also aligned with EN-1 paragraph 5.9.12, which requires that:
- "...the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents".*
- 12.5.11.11 In accordance with EN-1, the magnitude of impact (harm to heritage significance) will be articulated as set out in **Table 12.2**. While EN-1 does not expressly reference any categories of heritage benefit, it is prudent to consider (and widely applied in decision-taking) that any enhancement of heritage significance that might result from a Proposed Development should carry an equivalent level of weight in decision-taking, consistent with the principal underpinning EN-1 paragraph 5.9.36.

TABLE 12.2 – MAGNITUDE OF IMPACT (LEVEL OF HARM/BENEFIT)

	Adverse Impact (Harm)	Beneficial Impact (Enhancement)
Substantial harm/benefit	<ul style="list-style-type: none"> A level of harm to a designated heritage asset that would <i>"have such a serious impact on the significance of the asset that its significance [is] either vitiated altogether or very much reduced"</i>²⁹. 	<ul style="list-style-type: none"> A level of beneficial impact that would result in a substantial enhancement of the asset's significance, or the ability to appreciate its significance.
Less than substantial harm/benefit	<ul style="list-style-type: none"> Any lesser level of harm to a designated heritage asset than that defined by 'substantial harm'³⁰. PPG paragraph 018 requires that the level of any harm be quantified, and, in practice, a 'scale' is often referred to. This has been adopted here, as follows: <ul style="list-style-type: none"> Lower end Mid-scale Upper end 	<ul style="list-style-type: none"> A level of beneficial impact that would result in a material, but less than substantial enhancement of the asset's significance, or the ability to appreciate its significance.
Harm/benefit to a non-designated asset	<ul style="list-style-type: none"> Any loss of significance of a non-designated heritage asset. 	<ul style="list-style-type: none"> Any beneficial impact that would result in the enhancement of the significance of a non-designated heritage asset.

²⁹ Bedford Borough Council v. Secretary of State for Communities and Local Government and Nuon UK Ltd, (2013) EWHC 2847

³⁰ Recent case law has confirmed that this includes any level of harm (not considered substantial) regardless of its quantification, e.g. the finding of a 'negligible' level of harm must still be treated as less than substantial harm

	Adverse Impact (Harm)	Beneficial Impact (Enhancement)
	<ul style="list-style-type: none"> EN-1 para 5.9.33 does not require harm to non-designated heritage assets to be categorised as 'substantial' or 'less than substantial'. The scale of any harm is not quantified, but clearly articulated and qualified. 	
No harm/benefit	<ul style="list-style-type: none"> The development would not harm the significance of the asset. The asset's significance would be preserved and would remain unchanged. 	<ul style="list-style-type: none"> The development would not enhance the significance of the asset. The asset's significance would be preserved and would remain unchanged.

Significance of Effect

- 12.5.11.12 Once the significance of a heritage asset has been defined (with reference to **Table 12.1**) and the level of harm to its significance has been determined (with reference to **Table 12.2**), a statement will be made, informed by professional judgment, as to whether the effect would be Significant or Not Significant for purposes of EIA. That is the requirement under the EIA Regulations (2017).
- 12.5.11.13 Detailed qualification will be provided to support these findings. Each finding will be bespoke and will not be constrained by a pre-defined matrix and / or any quantifying terminology such as High, Medium, Low, Negligible etc., which can be overly reductive in relation to historic environment impacts (harm to heritage significance).

Cumulative Effects

- 12.5.11.14 The approach to Cumulative Effects Assessment (CEA) is described in **Chapter 18, Cumulative Effects**.

Addressing Uncertainty

- 12.5.11.15 Although it is unlikely that the overall predicted impacts of the Proposed Development on cultural heritage resources will diverge from the assessment presented here, there are important limitations to the available data set that it is important to highlight:
- Desk-based research relies on baseline data from third-party sources. More often than not these sources are entirely reliable, yet there are inevitable gaps in their geographical coverage;
 - Although below ground impacts can be predicted, there is always potential for encountering previously unknown and unexpected remains.

12.6 BASELINE

- 12.6.1.1 The described baseline environment for cultural heritage for the Proposed Development is for the most part unchanged from the Consented Development and is summarised briefly below. A full baseline is presented in the ES for the Consented Development and includes detail on Landscape Context and Historic Attributes, Designated Assets, Non-Designated Assets, Cartographic Evidence, National Character Areas and findings from fieldwork.

12.6.2 SUMMARY OF DESIGNATED HERITAGE ASSETS

- 12.6.2.1 There is one designated asset (Jodrell Bank Observatory, site 44, WHS 1466112), the outer buffer zone of which is located within the Site. This was designated as a World Heritage Site in 2019 and as such, is a new addition to the baseline as a result of the current assessment.

- 12.6.2.2 Within 250 m of the Site, there are a further three designated assets comprising:
- Drakelow Hall scheduled monument (site 17, SM 1020100);
 - RAF Cranage scheduled monument (site 18, SM 1020762); and
 - Rosebank House Grade II listed building (site 19, LB 1310621).
- 12.6.2.3 Drakelow Hall is contained inside the outer boundaries of the Site but not within the Site itself. RAF Cranage and Rosebank House are located 164 m and 206 m to the east, respectively.
- 12.6.2.4 Additionally, one notable non-designated asset—King Street Roman Road passes along the southwestern border of the Site.

12.6.3 HISTORIC LANDSCAPE DEVELOPMENT

- 12.6.3.1 The Site is located within the Shropshire, Cheshire and Staffordshire Plain National Character Area (NCA 61)³¹ which is a large, predominantly pastoral plain. The Site sits largely within the contemporary Civil Parish (CP) of Byley-cum-Yatehouse, with a small area to the north within Lach Dennis CP. During the Medieval and post-medieval periods the Site was located within the historical parishes of Davenham and Middlewich and contained the historic townships of Stublach, Byley cum Yatehouse, Rudheath and Newall.

12.6.4 PREHISTORIC

- 12.6.4.1 There are no confirmed sites or finds dating to the Palaeolithic, Mesolithic or Neolithic period within the Study Area. However, there is evidence of Bronze Age activity, indicated by a findspot for an unlooped palstave axe (site 9), within the Study Area as well as sites and finds within the wider area such as a looped and socketed Bronze Age hand axe found at Croxton (c 1.7 km to the southwest), and the possible remains of three round barrows near Kinderton Hall (c 1.3 km to the south).
- 12.6.4.2 Although no Iron Age sites or finds have been confirmed within the Study Area, Iron Age activity is evident in the wider region including the Lindow Man discovery, located c 15 km to the northeast.

12.6.5 ROMANO-BRITISH

- 12.6.5.1 The Site lies between two known Roman settlements at Middlewich and Northwich and the wider region is rich in remains of this period. As such, there is evidence of Roman activity within the Study Area in the form of King Street Roman Road (site 1) which runs north from Middlewich to Broken Cross (near Northwich) and crosses the far western boundary of the Site.

³¹ Natural England (2014) <https://publications.naturalengland.org.uk/publication/6076647514046464>

- 12.6.5.2 The presence of a second Roman road running in a northeast direction from Middlewich to Manchester has also been suggested. Excavation north of Holmes Chapel Road in Middlewich in 1999 unearthed a large section of Roman road which is believed to be the southern part of this route³², which would have run through or close to the east of the Study Area.
- 12.6.5.3 The presence of 'Street Field' (site 11) on the Stublach Tithe Map (c 600 m to the north of Byley) may also suggest the presence of a road running through the eastern side of the assessment area. Additionally, salt deposits around Middlewich, known as 'Salinae' (meaning salt works), were clearly exploited from the first century AD. A Roman fort was established to the north of the town at Harbutt's field (site 33) sometime between AD 70–80, and is believed to have been located to control the salt exploitation.
- 12.6.5.4 In particular, two areas of the Site have been identified as having the potential for unidentified buried remains dating to the Roman period- East of King Street and South of 'Street Field', this is due to their proximity to the above-mentioned known heritage assets.
- 12.6.6 EARLY MEDIEVAL & MEDIEVAL**
- 12.6.6.1 The 1836-51 tithe apportionment includes placenames suggestive of Anglo-Saxon settlement in the area and field names indicative of boggy unproductive land. The majority of the Site likely remained as unenclosed heathland until the establishment of Drakelow Hall manorial centre in the 14th century.
- 12.6.6.2 Drakelow Hall Moated Site (site 17) which the northwestern part of the Development Site surrounds, was the administrative centre for the Earl of Chester's (1333–76) estate around Rudheath, Middlewich and Northwich. Above ground remains that are protected within the scheduled area, consist of a well-preserved moated enclosure and fishpond, but it is also likely that remains of other parts of the manorial estate may survive as low earthworks or buried remains within its vicinity and the surrounding area. Previous work by AC Archaeology (1996) highlighted a historic reference to 'houses outside the moat' at Drakelow, which raises the potential for associated, contemporary structures in the vicinity of the asset. Many moated enclosures have associated features in the surrounding landscape such as approach tracks, hollow-ways and mills.³³
- 12.6.6.3 As discussed in Bagshaw's Directory (1850) the Hall later passed to the Abbey of Pulton before their removal to Dieulacres in Staffordshire, and the Abbot had a grange here.³⁴ The naming of

³² Cheshire County Council and English Heritage, 2003, Cheshire Historic Towns Survey, Middlewich Archaeological Strategy, Cheshire County Council, Chester.

³³ Aberg.F.A. (ed) (1978) CBA Research Report No. 17 Medieval Moated Sites. Council for British Archaeology. York

³⁴ Cheshire and Chester Archives and Local Studies (n.d.) Township Pack No. 59?: Byley Cum Yatehouse. Chester County Council.

'Abbotts Field' (site 12) on the Stublach Tithe Map and 'Far Abbotts Croft' (site 29) and 'Near Abbotts Croft' (site 30) on the Byley-cum-Yatehouse Tithe Map possibly indicates the location of some of this estate. Prior to the beginning of enclosure in the thirteenth and fourteenth centuries the study area would have been largely heathland waste with little to no enclosure.³⁵ The subsequent process of enclosure, after the establishment of the manor at Drakelow, created a series of tenement farms. Due to the lack of detailed early maps for the region however, it is difficult to map these properties in detail.

- 12.6.6.4 The process of improving newly claimed land involved 'marling' and this has resulted in the numerous marl pits, usually water-filled, scattered throughout the study area. Previous desk-based research (RSK 1998) identified documentary evidence of marling from the fourteenth century meaning many of the marl pits in the Study Area could date from this period. Extraction of clay for brick making was also probably carried out by this time, suggested by names on later tithe maps such as 'Brick Field' (site 31), 'Brick Kiln Field' (site 15) and Brickiln Field (site 32).

12.6.7 POST-MEDIEVAL & MODERN

- 12.6.7.1 By the post-medieval period, the majority of the Site became enclosed agricultural land, as suggested by names such as 'Wheat Field' and 'Cote Meadow', evident on tithe mapping. A number of historic structures of this date have been identified within the Study Area, comprising mainly rural buildings. A large number of historic hedgerows are also retained within the Site.
- 12.6.7.2 As the area is largely rural, land use has remained mostly agricultural into the Modern period with the exception of the former airfield at RAF Cranage (site 18) (located within the Study Area) developed during World War II.
- 12.6.7.3 Further detail is provided in the updated Desk Based Assessment presented in **Appendix 12A, Historic Environment Desk-Based Assessment**. Further historic environment baseline surveys are currently underway in the form of geophysical survey, the results of which will be reported in full within the forthcoming ES chapter.

12.7 MITIGATION AND ENHANCEMENT

- 12.7.1.1 This section describes the mitigation measures for cultural heritage during the construction, operation and maintenance phases of the Proposed Development considered in the assessment.
- 12.7.1.2 The goal of mitigation is to avoid, minimise or reduce impacts on the historic environment through the Proposed Development's design and working practices.

³⁵ Higham N 1993, The Origins of Cheshire. Manchester University Press.

- 12.7.1.3 The significance of the effects reported below is based on adoption of these measures in full.
- 12.7.1.4 Following the completion of the baseline investigations, including geophysical survey and any required intrusive phases of evaluation, further mitigation measures, in addition to those presented below, may be identified and committed to by the Applicant. These will be described and presented in full within the ES.

12.7.2 GENERAL MEASURES

- Input into design process to maximise the avoidance of known features;
- Landscaping to screen above ground elements of the Proposed Development, including tree planting; and
- The development of procedures in consultation with Cheshire Archaeology Planning Advisory Service (CAPAS) for the construction phase, clearly articulated outlined in full within an updated written scheme of investigation (WSI) and the Construction Environment Management Plan (CEMP).

12.7.3 SPECIFIC MEASURES

- 12.7.3.1 An archaeological watching brief will be carried out when historic hedgerows are cut. This will include the excavation and recording of a sample slot across each of the historic boundaries (typically comprising a ditch and bank).
- 12.7.3.2 Furthermore, high visibility sheet fencing will be erected during the construction period, including an appropriate buffer, around the boundary of the moat at Drakelow Hall Farm in order to avoid unintentional damage to the medieval earthworks.

12.8 ASSESSMENT OF EFFECTS

12.8.1 DIRECT IMPACT

Designated Assets

- 12.8.1.2 The Consented Development ES concluded that there would be no direct physical impacts to designated assets. This conclusion will not change for the Proposed Development or due to any of the changes reported in Section 12.4.

Non-designated Assets

- 12.8.1.3 The Consented Development ES did conclude there would be impacts on a number of non-designated assets (hedgerows and ridge and furrow) as summarised in **Table 12.3**. This remains the case for the Proposed Development, which shall also have impacts on non-designated assets.

- 12.8.1.4 The direct impact to non-designated assets as identified within the Consented Development ES (**Table 12.3**) have been reviewed and it has been concluded that the impacts remain unchanged.
- 12.8.1.5 Section 12.8.6 discusses additional direct impacts to non-designated assets within the Site, arising from new assets identified after the submission of the Consented Development ES.

TABLE 12.3 – POTENTIAL PHYSICAL EFFECTS DURING CONSTRUCTION IDENTIFIED IN THE CONSENTED DEVELOPMENT ES

Asset	Impact	Asset Sensitivity	Magnitude of Change	Significance of Effect
Historic hedgerow between Newall and Rudheath historic parishes	New Substation 132KV–32KV will require the removal of approximately 20 m of historic hedgerow. This will represent a small percentage of the total length of hedgerow present.	Low	Small	Not Significant
Historic hedgerow between Stublach and Rudheath historic townships.	H509 and H511. Associated pipelines will require the removal of approximately 100 m of historic hedgerow. This will represent a small percentage of the total length of historic hedgerow present.	Low	Small	Not Significant
Historic hedgerow between Stublach and Rudheath historic townships.	H518 and H519 and associated pipelines and access track will require the removal of approximately 50 m of historic hedgerow. This will represent a small percentage of the total length of historic hedgerow present.	Low	Small	Not Significant
Historic hedgerow between Byley and Rudheath historic townships.	Wellhead H505 and access track and pipelines (connecting GMC3 with wellheads H506, H516, H517, H503, H518 and H519 to the north) will require the	Low	Small	Not Significant

Asset	Impact	Asset Sensitivity	Magnitude of Change	Significance of Effect
	removal of approximately 70 m of historic hedgerow. This will represent a small percentage of the total length of historic hedgerow present.			
Historic hedgerow between Byley and Rudheath historic townships.	Wellhead H510 and associated access track and pipelines will require the removal of approximately 30m of historic hedgerow. This will represent a small percentage of the total length of historic hedgerow present.	Low	Small	Not Significant
Narrow ridge and furrow to east of Drakelow Hall Farm. Poorly preserved, disturbed by recent development.	Access track between Drakelow Lane and SMC3 and GMC3, and pipelines connecting the SMC3 and GMC3 with wellheads H509 and H511 to the north.	Negligible	Small	Not Significant
Ridge and furrow to the west of Puddinglake	Access track and pipelines between wellhead H518 and H519 will impact a small area.	Low	Medium	Not Significant
Broad ridge and furrow between Byley and Drakelow Gorse Farm	Wellhead H517, and access tracks and pipelines between H503, H517 and H506	Low	Medium	Minor
Broad ridge and furrow to north east of Yatehouse Green ('Wheat Field')	Wellhead H504 and associated access track and pipelines.	Low	Medium	Minor

12.8.2 INDIRECT IMPACTS

- 12.8.2.1 The Consented Development ES identified some potential to affect the settings of several designated assets of medium and high sensitivity, as detailed in **Table 12.4**.

TABLE 12.4 – POTENTIAL EFFECTS ON SETTING IDENTIFIED IN CONSENTED DEVELOPMENT ES

Asset	Description of Impact	Setting Sensitivity	Magnitude of Change	Significance of Effect
Site 17: Drakelow Hall moated site, fishponds and moated enclosure SM	Views of the GPP and wellhead H508 to the west will be heavily restricted by intervening vegetation surrounding the SM and within intervening field boundaries and surrounding ponds. However, taller elements within the GPP, such as the emergency cold vent, will be visible above this (similar views are described in Chapter 14, Landscape and Visual Impact Assessment for viewpoint 3). The GMC3 will also be perceptible to the southeast, although views will be heavily filtered by intervening vegetation (similar views are described in Chapter 14, Landscape and Visual Impact Assessment for viewpoint 4). These operational elements of the Proposed Development will be visible alongside preexisting infrastructure of a similar nature. However, there will be very little change from the existing DCO.	Medium	Small	Minor
Site 18: World War II defences of the former airfield of RAF Cranage SM	Vegetation lining Byley Road will heavily restrict views to the west. In addition, views of wellheads H518 and H519 will be largely screened by hedgerow vegetation within the surrounding fields (similar views are described in Chapter 14, Landscape and Visual Impact Assessment for viewpoint 11). Therefore, the Proposed Development will be largely	Medium	Negligible	Not Significant

Asset	Description of Impact	Setting Sensitivity	Magnitude of Change	Significance of Effect
	imperceptible from the SM. In addition, large scale infrastructure, including Buchan Cement Works and the Byley Gas Processing Plant, is already clearly visible to the north.			
Site 19: Grade II Listed Rosebank House	The Proposed Development will be largely imperceptible from this location. The closest Proposed Development elements will be wellhead H518 and H519, approximately 350 m and 550 m away respectively. Wellhead H518 will be screened from view by intervening hedgerow vegetation, and wellhead H519 will be only partially visible through intervening hedgerow vegetation (similar views are described in Chapter 14, Landscape and Visual Impact Assessment for viewpoint 11). In addition, the setting of this listed building is more strongly associated with the nearby contemporary elements within its curtilage. Therefore, the Proposed Development will have a negligible impact on the setting to the west.	Medium	Negligible	Not Significant

12.8.3 ASSESSMENT OF NEW CULTURAL HERITAGE EFFECTS FOR THE PROPOSED DEVELOPMENT

- 12.8.3.1 All potential impacts to the settings of heritage assets identified within the Consented Development ES (as shown in **Table 12.4**) have been reviewed in light of the design changes set out in section 12.4 and it is considered that only one designated asset, Drakelow Hall Moated Site (site 17) requires an updated setting assessment. This is due to the introduction of amended infrastructure (as detailed in section 12.4), specifically the encroachment of the GPP which now lies within 75 m of Drakelow Hall.
- 12.8.3.2 Jodrell Bank observatory is a new designated asset, listed in 2019, as such, it requires a settings assessment to be completed to assess any possible impact to setting as this was not designated at the time of the Consented Development ES submission.
- 12.8.3.3 Impacts to setting for designated assets identified within the Study Area remain the same as those identified in the Consented Development ES and are further detailed in **Appendix 12A, Historic Environment Desk-Based Assessment**.
- 12.8.3.4 A summary of the updated assessment of both direct and setting effects is provided below for the Proposed Development.

12.8.4 CONSTRUCTION

Designated Assets – Physical

- 12.8.4.2 The Proposed Development Site is located within the outer buffer zone of the Jodrell Bank Observatory World Heritage Site (WHS) (site 44, 1466112) polygon. However, the observatory itself is located 7.4 km to the northeast and as such, no direct impact to the asset is anticipated despite the location of the site within this buffer.
- 12.8.4.3 Drakelow Hall scheduled monument (SM) (site 17, 1020100) is located outside the Proposed Development Site therefore no direct impact to this asset is anticipated as a result of the construction phase of the Proposed Development.

12.8.5 DESIGNATED ASSETS – SETTING

- 12.8.5.1 As noted above in Section 12.8, two designated assets require an updated assessment of setting, Jodrell Bank WHS and Drakelow Hall SM. This is a result of the changes to the Proposed Development and listing of a new WHS within the development boundary. A summary of the effects on setting for the above-mentioned assets is provided below. A full assessment of effects to setting is provided in **Appendix 12A, Historic Environment Desk-Based Assessment**.

Jodrell Bank Observatory (site 44):

- 12.8.5.2 Jodrell Bank Observatory is a World Heritage Site, the scheduled area of which represents both the observatory itself and its outer buffer zone. The observatory is located in a rural area of northwest England, free from radio interference.
- 12.8.5.3 As a World Heritage Site, Jodrell Bank comprises a designated heritage asset of the highest significance. Its significance derives from a combination of its architectural and historical association, particularly as the site of the Lovell and the Mark II Telescopes. The site also holds some archaeological interest due to the potential for below ground archaeological remains.
- 12.8.5.4 The observatory is located in open countryside, a placement which is strategic to facilitate its function. With regard to setting, the observatory itself is mostly contained within the context of its internal landscaped area, referred to as the Green, however, views towards the telescopes from the surrounding landscape are an important part of their setting. Outward views from the telescopes to the wider landscape are of lesser importance as they do not contribute to the ability to understand the asset's function. The rural context of the telescopes is also important for understanding the strategic placement and function of the observatory.
- 12.8.5.5 Due to its location at distance to the southwest, there is no intervisibility between the observatory and the Site. As such, there are no important views from the Site to the asset. Additionally, there are no material non-visual historical associations between the asset and the Site. With regard to development within the outer buffer zone of the WHS, the Site is located adjacent to existing gas storage facilities. As such, this is an already partially industrialised landscape. Site infrastructure within the GPP area is not expected to be overly tall (with buildings limited to 10–15 m) and the majority of infrastructure outside of the GPP as part of the Consented Development (i.e., caverns) are below ground. This is not anticipated to significantly change the rural context of the landscape.
- 12.8.5.6 It is therefore considered that the proposals would result in no harm to the significance of the asset. The asset's significance would be preserved and would remain unchanged. The key contributing heritage interests and aspects of setting to the significance of the asset, as described previously within this section, would all be preserved. This is a Not Significant effect in terms of EIA.

Drakelow Hall Moated Site (site 17):

- 12.8.5.7 Drakelow Hall Moated Site is a scheduled monument which exists as a well-preserved earthwork, unencumbered by modern building. It comprises an island, 55 m square, a moat 5 m wide by 1.7 m deep and an associated linear set of fishponds. This monument is

located within 3 km of another moated site, Kinderton Hall (site 34).

- 12.8.5.8 As a scheduled monument, Drakelow Hall comprises a designated heritage asset of the highest significance. Its significance derives from a combination of its historic and archaeological interest. The asset is located within a largely rural and agricultural landscape, defined by well-maintained hedgerows featuring numerous mature trees. Recent developments in the form of solution mining and gas storage infrastructure to the south, east, northeast and east are conspicuous elements in the landscape that detract from the rural character. Approximately 230–300 m to the southwest and northeast of the monument are areas of ‘ancient fieldscapes’ which predate AD1600 and could therefore represent contemporary medieval enclosures.
- 12.8.5.9 The landscape immediately surrounding the monument comprises post-medieval and modern fieldscapes, punctuated by 19th century buildings such as Drakelow Farm located c. 50 m to the north of the monument. Although the original landscape setting has been largely replaced/altered, the later post-medieval fieldscapes have been in place since at least 1836–51 (Tithe mapping) and have essentially retained the setting of what was a rural demesne manor. Views from the asset to its immediate landscape would have been important historically, but today these are screened by the semi-mature and mature vegetation that surround it. However, views towards the monument are still possible from within the fields that surround it, though not of the earthworks themselves.
- 12.8.5.10 The aspects of the asset’s setting that contribute to its significance include views within the monument itself between the moated site and the fishponds and views towards the monument from its surroundings. The rural character of its surroundings also contributes to a limited extent as it preserves in a general sense the setting of what was a rural demesne manor. However, the asset derives by far the largest portion of its significance from its archaeological interest.
- 12.8.5.11 The Proposed Development will introduce new industrial infrastructure within proximity to the asset, the closest of which is the Gas Processing Plant (GPP) and wellhead H508 located 75 m to the northwest of the scheduled area. This GPP in particular is now located at a closer distance than the design as assessed in the Consented Development ES. Due to its location at a close distance, there is likely to be intervisibility between the asset and the GPP aspect of the Site. However, this is already partially mitigated by intervening vegetation surrounding the monument. Taller elements within the GPP, such as the elevated and enclosed ground flares would likely be visible above vegetation but this will only be visible on rare occasions and is unlikely to entirely obstruct views to or from the asset.

- 12.8.5.12 As the surrounding landscape character does contribute to the significance of the asset, the introduction of such infrastructure will introduce an impact to setting that is on the lower end of less than substantial. The introduction of further infrastructure beyond the boundary of the monument is not likely to significantly change the rural context of the landscape nor will it be overly intrusive to the setting of the asset.
- 12.8.5.13 Therefore, it is considered that the Proposed Development would result in no harm to the significance of the asset. The asset's significance would be preserved and would remain unchanged. The key contributing heritage interests and aspects of setting to the significance of the asset, as described previously within this section, would all be preserved. This is a Not Significant effect in terms of EIA.

Other Designated assets

- 12.8.5.14 As well as the above-mentioned assets, several scheduled monuments are located within relative proximity to the Study Area, including King Street Roman fort, Harbutt's Field (site 33) and Kinderton Hall moated site, two annexes, five fishponds, garden and prospect mound (site 34) both c 1.5 km to the south of the assessment area. However, no adverse impact to the setting of these monuments is anticipated to arise as a result of the Proposed Development.

12.8.6 NON-DESIGNATED ASSETS – PHYSICAL

- 12.8.6.1 A total of fourteen non-designated assets from the Cheshire Historic Environment Record (CHER) have been identified within or adjacent to the Proposed Development Site. These comprise of:
- King Street Roman Road (site 1);
 - three post-medieval farm buildings site 2, 3, 8);
 - six findspots (Site 9, 49, 50, 51, 52, 53);
 - two ridge and furrow (site 56, 55);
 - a length of double hedgerows (site 10); and
 - one modern cinder track (site 16).
- 12.8.6.2 As well as sections of historic hedgerow and ephemeral ridge and furrow.
- 12.8.6.3 No direct impact is anticipated to King Street Roman Road (site 1) due to its location crossing only the western portion of the Development Site with no substantial infrastructure anticipated to truncate the area. Additionally, the road is still in use as the A530 and B5309, meaning the likelihood of the asset itself being preserved in this exact location is low.
- 12.8.6.4 No direct impact is expected for any of the identified findspots due to there being no remaining archaeology in the spot. There may

however be an increased potential to discover unknown buried remains relating to the findspots in these areas.

- 12.8.6.5 Additionally, no direct impact is anticipated for the post-medieval brick-built farmhouses and the two ridge and furrow features. This is due to their location away from Site infrastructure.
- 12.8.6.6 There remains potential for direct physical impact to numerous historic hedgerows and other ridge and furrows as a result of the Proposed Development, arising from truncation of some sections. Effects to these assets remain the same as those presented in the Consented Development ES (**Table 12.3**), with no significant effects predicted.
- 12.8.6.7 There is potential for direct impact to unknown buried remains within the Development Site as a whole but particularly within the four areas of archaeological sensitivity as defined by the Consented Development DBA. These four areas are defined below.
- 12.8.6.8 West of Drakelow Hall Moated Site: whilst there will be no direct physical impact on the designated area (site 17), there is potential for physical impacts on unknown contemporary features which may be present in the landscape around the scheduled monument. Many moated enclosures have associated features, and the potential presence of such features at Drakelow Hall is further suggested by historical references to 'houses outside the moat'. Wellhead H508 and associated pipelines and access track are located c 75 m to the west of the Scheduled area and if construction activities are unmitigated, it could potentially result in physical impacts.
- 12.8.6.9 East of King Street: there will be no direct physical impact on King Street (site 1) however, there is potential for previously undiscovered associated contemporary features, such as burials or quarry pits, in proximity to the road. The construction laydown areas are located approximately 30 m to the east of King Street and could therefore potentially result in physical impacts on buried archaeological remains if unmitigated.
- 12.8.6.10 South of 'Street Field' (site 11): no construction activities will take place within the field itself; however, the name may suggest that a Roman road ran across this part of the assessment area. This is further suggested by remains of a Roman road believed to be the route between Middlewich and Manchester discovered north of Holmes Chapel Road in Middlewich. Therefore, construction activities around wellhead H519 and H518 and associated pipelines and access road could potentially cause physical impacts to any surviving remains if unmitigated.
- 12.8.6.11 'Brick Kiln Field' (site 15): the access track and pipelines associated with wellhead H501 run through this field. The name suggests the possible presence of archaeological remains relating to the brick making industry dating from the post-medieval period or earlier.

Construction activities within the field could therefore result in physical impacts if unmitigated.

- 12.8.6.12 Further information can be found in Cultural Heritage Annex A, Desk-Based Assessment in the ES for the Consented Development.

12.8.7 OPERATION AND MAINTENANCE

Designated Assets – Physical

- 12.8.7.2 Physical effects on buried archaeology are one-off and irreversible and therefore maintained through the operation and maintenance phase. Therefore, no additional physical effects upon designated heritage assets are anticipated during operation and maintenance of the Proposed Development.

Designated Assets – Setting

- 12.8.7.3 Relative to the construction phase, the potential for visual, aural and dust intrusion on the settings of designated heritage assets is predicted to be overall lower during the operation and maintenance phase. However, permanent effects to the setting of one scheduled monument—Drakelow Hall Moated Site (site 17) are anticipated to persist into the operational phase of the Proposed Development. This is due to the presence of Site infrastructure (specifically the GPP) within 75 m of the scheduled monument, introducing permanent effects to the setting of the asset.
- 12.8.7.4 Permanent effects are expected to be the same as those identified in the construction phase and will become permanent once the infrastructure has been erected. Operational phase effects arise solely from the construction of above ground infrastructure which will become a permanent addition to the landscape.

Non-Designated Assets – Physical

- 12.8.7.5 Physical effects on buried archaeology are one-off and irreversible and therefore maintained through the operation and maintenance phase. Therefore, no additional physical effects upon non-designated terrestrial heritage assets are anticipated during operation and maintenance of the Proposed Development.

12.9 SUMMARY OF CUMULATIVE EFFECTS

- 12.9.1.1 The cumulative effects of impacts from the Proposed Development together with impacts from other planned projects or developments on the same resources and / or receptors are assessed **in Chapter 18, Cumulative Effects**.
- 12.9.1.2 The ES will summarise the conclusions of the Cumulative Effects Assessment (CEA) that are relevant to the historic environment.

12.10 SUMMARY AND CONCLUSIONS

- 12.10.1.1 This assessment has been informed by a desk-based study and non-intrusive fieldwork, which have revealed evidence for archaeological remains both within and in the vicinity of the Proposed Development. These archaeological remains include several designated assets within a close distance to the Site, dating from the Roman to the post-medieval period, evidencing multi-phased use of the area. Specifically, four areas of archaeological sensitivity have been identified within the Site comprising; west of Drakelow Hall Moated Site, East of King Street Roman Road, South of 'Street Field' and within 'Brick Kiln Field'. Due to changes to the scale and layout of above ground infrastructure, there is a slightly higher potential for impacting unknown buried remains in these areas than that which was concluded in the Consented Development ES.
- 12.10.1.2 Due to this increased potential for encountering unknown buried archaeology, a phased archaeological investigation is being undertaken to better our understanding and allow for a more robust impact assessment to be reported in the forthcoming ES.
- 12.10.1.3 Further baseline surveys consisting of geophysical survey are currently being undertaken to allow a more detailed understanding of the extent, character, condition and likely age of buried archaeological remains across the Site footprint.
- 12.10.1.4 An updated assessment of the potential impact of the Proposed Development on buried archaeology will be undertaken using any new information generated during these additional surveys. The results of this updated assessment will be presented in the ES.
- 12.10.1.5 An updated assessment of the potential impact of the Proposed Development on the setting of all heritage assets will be undertaken using any new information generated by design changes or by other topic assessments. Additional site visits will be undertaken where necessary. The results of this updated assessment will be presented in the ES.
- 12.10.1.6 Section 12.7 sets out the proposed mitigation measures, including, where possible, mitigation by avoidance, archaeological monitoring during construction and the establishment of additional screening methods to minimise settings effects.
- 12.10.1.7 The results of the intrusive surveys will be used to inform the design of any additional mitigation measures and these measures reported in the ES. These may take the form of additional exclusion zones or redesign measures to avoid areas of archaeological sensitivity. If avoidance is not feasible then controlled archaeological excavations may also be proposed.
- 12.10.1.8 Based on the currently available information, the heritage assets identified (designated and non-designated) to date are expected to experience adverse effects ranging from Minor (Not Significant) to

Negligible (Not Significant) as a result of the Proposed Development's construction, operation (and maintenance).

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