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Date: 27<sup>th</sup> October 2023

Dear Amit,

**Re. Outline planning application (with all matters reserved except for access) for up to 350 dwellings, up to 4,400 sqm of commercial and services floorspace (Use Class E and B8), and up to 500 sqm of retail floorspace (Use Classes E) and other associated works including drainage, access into the site from the A10 and Luynes Rise (but not access within the site), allotments, public open space and landscaping. - Land East Of The A10 Buntingford Hertfordshire**

## **ARCHAEOLOGICAL IMPLICATIONS**

Thank you for consulting us on the above application. I note that it succeeds several previous applications for the development of the site.

Please note that the following advice is based on the policies contained in the National Planning Policy Framework

As per previous advice provided by this office, the following comments are based on the results of an archaeological evaluation of this site that was carried out in 2015, prior to determination of and in relation to an initial outline planning application for outline planning permission (ref. 3/14/2304/OP).

The archaeological investigation of the site, via geophysical survey and trial trenching, established that it contains a series of archaeologically significant features which are focused in the north and the south-west of the site and primarily on higher ground. These indicate several phases of activity, including a segmented enclosure of Middle to Late Bronze Age date (c.1500 BC – c.1100 BC), and Later Iron Age and early Roman pits and ditches, the latter representing field systems. The quantity and condition of the Roman pottery found suggests that the evaluation trenches lie in close proximity to a settlement of Romano-British date. A probable inhumation burial found (but not excavated, only the skull was revealed) in a trench in the south-west of the site may be of Later Iron Age or Roman date.

The evaluation also recovered two deposits of cremated bone, of possible Roman date, which were found in association with five pits containing burnt material. One of the deposits

contained bone relating to multiple individuals, and it is suggested that these features represent the debris from an as yet unidentified cremation pyre.

An updated *Heritage Assets Impact Assessment* submitted with this application (Icknield Archaeology, 2023) concludes that the (8.3) *'The evidence for the presence of buried heritage assets of the prehistoric, and Roman periods has been clearly demonstrated in this assessment report.'* and (8.4) *'The housing development is to take place over an area of c.10.13 ha and the excavation of footing trenches, service runs, landscaping works, etc., have the potential to disturb or destroy any buried heritage assets which may be present. The impact of the proposed development within the area of the proposed housing is assessed as being high.'*

I note that an area of land west of the A10 is included within the current application. Only a very small proportion of this area was included in the land evaluated via 3/14/2304/OP, but I note from the Planning Statement (1.1) that *'The Application also includes land to the southwest of the A10 which is not part of the land proposed for built development but is included in the Application and will be retained as agricultural land and comprises an area for ecological enhancement.'* I will, therefore, make no specific comment on this area of land with regard to the current application.

The development site (east of the A10) is known to contain heritage assets of archaeological interest of local and potentially regional significance, and the development of the site will cause substantial harm to these assets.

However, I consider the impact of the proposal can be mitigated by the placement of an appropriate archaeological condition on consent, should this be granted. This should provide for a detailed programme of archaeological investigation of the site, prior to the finalizing of a detailed masterplan for the development (should this be required) and/or prior to the determination by the LPA of relevant reserved matters. The condition should also provide for the full analysis of the results of the archaeological work (including the results of the initial evaluation of the site), the production of a report and an archive, and the full publication of the results of the investigation.

I consider that the position of the proposed development is such that it should be regarded as likely to have an impact on heritage assets of archaeological interest and I recommend that the following provisions be made, should you be minded to grant consent:

1. A detailed programme of archaeological investigation of those areas of the site known to contain archaeological remains, via 'open area excavation' and the implementation of other appropriate mitigation measures as necessary.

These would include (but are not limited to) the appropriate archaeological excavation of any archaeological remains before any development commences on the site, and the option of the physical preservation of any archaeological remains *in situ*, if warranted, by amendment(s) to the design of the development if this is feasible.

- 2) The archaeological monitoring and recording of the ground works of the development, including services, access, drainage works, landscaping, etc. as appropriate (and also including a contingency for the preservation or further investigation of any remains then encountered).

- 3) The analysis of the results of the archaeological work (including the results obtained from the evaluation of the site) with provisions for the subsequent production of an interim report or reports, the creation of an integrated archive, and the full publication of the results of all the archaeological work.
- 4) Such other provisions as may be necessary to protect the archaeological interests of the site.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow para. 205, etc. of the National Planning Policy Framework, relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case an appropriately worded condition on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording (based on model condition 55 DoE circ. 11/95):

*No development shall take place within the proposed development site until the applicant, or their agents, or their successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, which has been submitted to the planning authority and approved in writing. This condition will only be considered to be discharged when the planning authority has received and approved an archaeological report of all the required archaeological works, and if appropriate, a commitment to publication has been made.*

If planning consent is granted, we will be able to provide detailed advice concerning the requirements for the investigations, and to provide information on professionally accredited archaeological contractors who may be able to carry out the necessary work.

I hope that you will be able to accommodate the above recommendations.

Please do not hesitate to contact me should you require any further information or clarification.

Yours sincerely,

Alison Tinniswood  
Senior Historic Environment Advisor, Hertfordshire LEADS  
Environmental Sustainability

*Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire.*