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Development Management
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Date: 26th November 2024

Dear Steve,

Re: Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access. - Land North Of A507, West Of A10 Buntingford

ARCHAEOLOGICAL IMPLICATIONS

Thank you for consulting this office on the above application.

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

This office previously commented on 3/23/2350/SCREEN: Request for a screen opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - Residential development (up to 600 dwellings) and associated uses, as part of Hertfordshire County Council's Growth & Infrastructure Team's combined response to East Herts Council's consultation.

I reproduce part of our response:

The proposed development site, while its size is unspecified, is very large. Any development on this kind of scale in Hertfordshire has potential for impacting archaeological remains of high significance, even if such remains are not currently known from within the site. This is due to the widespread nature of as yet undiscovered archaeology in the county. In the majority of cases, for a development of this size, this office will recommend that the impact it could have on the historic environment is such that an EIA would be required.

In this instance, given its size and the widespread occurrence of archaeological sites of multi-period dates in the vicinity, the proposed development site should be regarded as having the potential to contain (undesigned) heritage assets with archaeological interest, and the proposed development has the potential to have a major adverse effect on any such currently unknown archaeological remains.

Should, therefore, the Planning Authority consider that an EIA is required we recommend that the historic environment is 'scoped in', in order that sufficient information is included in the environmental statement to enable an informed planning decision to be made. This information should comprise:

- an archaeological desk-based assessment, which should include consideration of the wider area as well as the site itself and the implications this may have on the potential for the site to contain heritage assets and their likely significance
- a report on the results of a non-intrusive geophysical survey of the site
- a report on an archaeological trial trench evaluation of the site.

Given an outline planning application has now been made, the above information should now be submitted to the Planning Authority in support of this application to develop the site, in line with the NPPF para 200.

The applicant has thus far submitted an archaeological desk-based assessment of this proposed development site (*Land North of A507 and West of A10 Archaeological Desk-Based Assessment*, Orion Heritage 2024).

With regard to recommendation 2, this office is aware that a non-intrusive geophysical survey of the majority of the site was carried out in late summer/early autumn 2024 by SUMO Survey Services. We were informed by Orion Heritage (23/10/24) that SUMO had 'a few areas to finalise over the next month or so and I will be in touch with their report for review in due course.' We have not been sent this report, as yet.

The report on this geophysical survey should therefore be submitted to the Planning Authority, and this Office re-consulted.

We will then be able to advise you further, based on the information in the desk-based assessment, and the results of the geophysical survey, as the nature of the archaeological field evaluation of the site, via trial trenching, to establish the type, scale, significance and quality of heritage assets likely to be affected by the proposal.

An informed decision can then be made with reference to the impact of the proposal on the historic environment, prior to the determination of the application. Where archaeology is identified, but does not meet NPPF, para. 206, fn 72, an appropriate level of archaeological mitigation can then be secured by negative condition (NPPF, para. 211).

We also recommend that the archaeological trial trench evaluation is carried out in line with a written scheme of investigation that has been approved by this office so that the information submitted will be sufficient to inform any planning decision.

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.