

Ms Kirsty Shirley
Planning
Welwyn Hatfield Borough Council

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HERTFORD SG13 8DN

Contact Alison Tinniswood
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My ref P06/22/2759-5
Your ref 6/2022/2759/FULL
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Date: 25th July 2022

Dear Kirsty,

Re: Erection of two industrial units for light industrial processes (E(g)(iii)) / general industrial (B2) / storage & distribution purposes (B8) and ancillary office space, with associated parking, access and supporting infrastructure. - Plot 5610 Gypsy Moth Avenue Hatfield AL10 9BS

ARCHAEOLOGICAL IMPLICATIONS AND WRITTEN SCHEME OF INVESTIGATION

Thank you for consulting us on the above application.

The proposed development lies within the former Hatfield Aerodrome to the west of Hatfield. A range of archaeological investigations carried out within the area of the Business Park since 1999 have revealed widespread archaeological remains of largely prehistoric date throughout the former aerodrome, including field systems and evidence for settlement and funerary remains.

Middle Bronze Age and undated ditches, post-holes and pits [Historic Environment Record no 11542], possible boundary ditches of Late Bronze/Early Iron Age date [HER no 11553] and three undated cremation burials [HER no 11552] have been excavated immediately south of Plot 5610. More recent excavations to the south have revealed further evidence of Middle to Late Bronze Age activity in the form of field systems, possible structures and cremation burials.

I consider that the proposed development 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. the archaeological investigation, via 'strip, map and record' to the archaeological horizon, of the footprints of the new buildings, and of any other areas of the site where groundworks for associated parking, access, and supporting infrastructure etc. are likely to impact upon archaeological remains, together with the appropriate

archaeological excavation and recording of any remains present. This should include a contingency for the preservation of any remains encountered, should this be appropriate;

2. the archaeological monitoring and recording of any other groundworks associated with the development, as appropriate (including a contingency for the preservation or further investigation of any remains then encountered);
3. the analysis of the results of the archaeological work with provision for the subsequent production of a report and an archive, and the publication of the results, as appropriate;
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 Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case three appropriately worded conditions on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording:

A *No development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:*

1. *The programme and methodology of site investigation and recording*
2. *The programme for post investigation assessment*
3. *Provision to be made for analysis of the site investigation and recording*
4. *Provision to be made for publication and dissemination of the analysis and records of the site investigation*
5. *Provision to be made for archive deposition of the analysis and records of the site investigation*
6. *Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.*

B *The development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition (A)*

C *The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis and publication where appropriate.*

I note, in the context of the above recommended conditions, that the applicant has submitted a Written Scheme of Investigation (WSI) (Cotswold Archaeology, Hatfield

Business Park, Plot 5610, Hatfield Hertfordshire Written Scheme of Investigation for an Archaeological Excavation, November 2022), perhaps with the intention of negating the need for Condition A.

We do not advocate this practice. The staged conditions A, B and C achieve a clear separation between the submission of appropriate documentation to enable the discharge of the pre-commencement element of the condition, and then the satisfactory completion of not only the programme of archaeological works on site, but also the post investigation assessment, analysis, and publication of the results of the fieldwork, and deposition of the site archive. In our view, they also provides clarity as to what is discharged, and when, and greater enforceability.

Furthermore, I advise that the WSI submitted does not meet the requirements of this Office.

The document does not provide an adequately detailed methodology for the programme of archaeological work required. It lacks plans of the existing site layout and of the proposed development, and the extent of the proposed archaeological excavation area is not shown on plan. The various impacts of the scheme are not assessed and there is no provision for archaeological monitoring in areas where there may be a lesser development impact. Other, more minor points, will also need to be addressed.

Please also note that it is stated in the WSI (1.3) '*The requirement for an excavation was defined in discussions with Hertfordshire County Council's Historic Environment Team (HCCHET), the archaeological advisors to WHBC. **Further discussion with the HCCHET will be required to define the scope of the excavation.** This WSI will be submitted to HCCHET for review.*'

We have not had any such further discussion with Cotswold Archaeology about the scope of the excavation, nor has a WSI been submitted or reviewed.

I am happy to contact the applicant or their archaeological contractor to discuss this further.

If planning consent is granted, I 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.

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.