## Environment & Infrastructure Chief Executive: John Wood



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Date: 31 August 2018

Dear Louise,

Re: Erection of new teaching block, replacement tarmac play areas and additional parking provision - Stanborough School Lemsford Lane Welwyn Garden City AL8 6YR

## ARCHAEOLOGICAL IMPLICATIONS

Thank you for consulting me on the above application.

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

The proposed development is located within Area of Archaeological Significance no. 11, as identified in the Local Plan. This covers the probable extent and immediate surroundings of a significant Late Iron Age or Early Romano-British settlement enclosure (Historic Environment Record no. 161) at the current Stanborough School.

This roughly rectangular enclosure, measuring circa 60m E-W by 50m N-S, was first discovered in 1938 when the former Welwyn Garden City Grammar School was built, and first investigated by archaeologists in 1953 (Arnold 1952-4). Trenches were dug through the enclosure ditch, finding that it had been backfilled with large quantities of 'Belgic' pottery, along with a coin of Claudius and part of a La Tene III brooch. 'Scanty' evidence of a dwelling was found within the boundary, and two urned cremation burials were uncovered to the north of the enclosure.

A further trench was put through the enclosure ditch in 1997, prior to development, and the ditch was found to contain an unusually high concentration of 1<sup>st</sup> century AD pottery (Archaeological Services & Consultancy 1997). The large size and unabraded nature of the pottery suggested that domestic areas were close by.

From the proposed plans it looks like the proposed classroom block and car park extension will be located outside the enclosure, although the classroom block in particular will be positioned only 20m or so to the west. The accompanying Design and Access Statement mentions that the proposed classroom block will be on 'previously developed tarmac ground', although it is unclear what form this previous development took – i.e. was the land previously built up or reduced? The foundations of the proposed classroom block are likely to be extensive, and would normally be expected to penetrate below a relatively thin layer of tarmac/made ground.

Despite being on the exterior of the enclosure ditch, archaeological potential is still high at this location. Notably, the two cremation burials were found on the exterior of the enclosure on the other side, while industrial activities are known to have taken place outside similar enclosures elsewhere.

With the above in mind, I believe that the position of the proposed development is such that it should be regarded as likely to have an impact on heritage assets with archaeological interest. I recommend that the following provisions be made, should you be minded to grant consent:

- 1. The archaeological field evaluation, via trial trenching, of the proposed development area, prior to any development taking place;
- 2. Such appropriate mitigation measures indicated as necessary by that evaluation. These may include:
  - a) the preservation of any archaeological remains in situ, if warranted;
  - the appropriate archaeological excavation of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results;
  - the archaeological monitoring and recording of the ground works of the development, including foundations, services, landscaping, access, etc. (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, with provisions 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 the policies included within Policy 16 (para.199, etc.) of the National Planning Policy Framework. and the guidance contained in Historic England's Historic Environment Good Practice Advice in Planning Note 2 (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 and methodology of site investigation and recording as suggested by the evaluation;
- 3. The programme for post investigation assessment;
- 4. Provision to be made for analysis of the site investigation and recording;
- 5. Provision to be made for publication and dissemination of the analysis and records of the site investigation;
- 6. Provision to be made for archive deposition of the analysis and records of the site investigation;
- 7. 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.

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,

Dr Simon Wood FSA Scot Historic Environment Advisor Environmental Resource Planning