



Mr Gerry Ansell
Planning
Welwyn Hatfield Borough Council

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Contact Simon Wood
Tel 01992 588039
My ref P06/18/2768
Your ref 6/2018/2768/OUTLINE
historic.environment@hertfordshire.gov.uk

Date: 12 December 2018

Dear Gerry,

Re: Outline application for a large-scale mixed use development including 1,100 new homes and supporting infrastructure including a primary school, local centre and open space with all matters reserved - Hatfield Business Park Hatfield AL10 9SL

ARCHAEOLOGICAL IMPLICATIONS

Thank you for consulting me on the above application.

The introduction to the applicant's Environmental Statement (ES) lays out the background to how the scope of the EIA was determined. Para 1.5.2 states that 'the decision has been taken by the Applicant/Project Team to submit the outline planning application without gaining an Opinion but based on combined professional judgement'. In Chapter 6, topics considered not to have significant effects are briefly discussed, and these include Cultural Heritage under the heading of which archaeology falls in the EIA regulations.

It is extremely concerning and unusual that the historic environment has been entirely scoped out of the EIA process, and that there is no appropriate justification for this in Chapter 6. There is no informed explanation included to suggest that appropriate combined professional judgement incorporating the expertise of historic environment professionals was used to determine the scope of the EIA.

Given the scale of the development and the archaeological potential of the area this office, should it have been consulted, would have advised that consideration of the historic environment, including archaeology, was scoped into the EIA, as per Regulation 4(2) and Schedule 4 Para 4 of the EIA Regulations (2017).

It is also concerning that the supporting documentation submitted by the applicant does not include an archaeological desk-based assessment, and that the Hertfordshire Historic Environment Record has not been consulted. The application does not therefore meet even the minimum requirements of NPPF para 189.

The proposed development is itself situated within the boundaries of an undesignated heritage asset, the former Hatfield Aerodrome. Archaeological excavations also within the former aerodrome just to the east of the proposed development area have identified widespread archaeological remains dating to the Bronze Age, Iron Age, Roman and Anglo-Saxon periods, including human cremations. It is clear that this area was intensively settled during those periods, particularly the Late Bronze Age/Early Iron Age.

The proposed development, lying just to the west of this, and with an area of some 67.50ha, clearly has the potential to disturb buried undesignated heritage assets of unknown significance.

Given the extensive size of the proposed development and the potential of the site for below ground archaeological remains, further information is needed prior to determination of the application to determine what impact the development may have on archaeological assets. At present, not enough information is available to determine whether remains of sufficient importance to meet NPPF para. 194 (footnote 63) are likely to be present.

I recommend that the following investigations should be undertaken predetermination (NPPF para. 189) to describe the type, scale, and quality of heritage assets likely to be affected by the proposal:

1. An archaeological desk-based assessment of the development area. This should include a walkover survey of the site.
2. A geophysical survey of the entire development area.
3. Following the geophysical survey, a trial trenching evaluation of the entire development area.

An informed decision can then be made with reference to the impact of the proposal on the historic environment.

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