

Ms Catherine Gooding-Williams
Planning
Welwyn Hatfield Borough Council

**Postal Point CHN 108
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN**

Contact Daniel Phillips
Tel 01992 588039
My ref P06/21/0181
Your ref 6/2021/0181/MAJ
historic.environment@hertfordshire.gov.uk

Date: 25th October 2021

Dear Catherine,

Re: Hybrid planning application comprising: Detailed Planning Application for 399 Private Rented Sector (PRS) dwellings and 153 dwellings (Class C3), 250 units of residential care accommodation for the elderly (Use Class C2) with associated communal facilities, 15,247m² of community and commercial hub (Use Classes E and F1) with associated cycling hub, car parking, access, landscaping, public art and other supporting infrastructure; and Outline Planning Application for up to 418 dwellings (Class C3) with all matters reserved except access: Former Shredded Wheat Factory Broadwater Road Welwyn Garden City AL7 1RR

ARCHAEOLOGICAL IMPLICATIONS

Thank you for consulting this office on the above application.

Please note that we have previously commented and advised on this current application. Our recommendations remain unchanged and noted below. Please also note that this office has yet to receive, review and approve a Historic Building Record supposedly already undertaken.

This office has previously been consulted on similar schemes for this site, notably planning applications N6/2015/0293/LP and N6/2015/0294/PP, as well as more recent planning application 6/2018/0171/MAJ. In the latter case we recommended archaeological conditions, and advised the necessity of carrying out an archaeological field evaluation. We also advised that a professional standard historic building recording be carried out prior to any development commencing. I note that demolition of the grain silos may have already taken place under the previously granted permissions, and this office has not yet seen a completed historic building recording report, although reference is made to one in the accompanying application documents.

The proposed development site is circa 4.7 ha in area and is currently occupied by the Grade II listed former Shredded Wheat Factory (Historic Environment Record no. 10880), other industrial structures and areas of hard standing and vegetation.

The factory is an exceptional example of early 20th century modernist architecture and a prominent landmark of Welwyn Garden City. A Heritage Statement submitted with the application explores the history of the building in considerable detail (KM Heritage 2017). While we would be in favour of retaining the factory and all of its silos if at all possible, we note that permission for demolition of large parts of the building and all but the original 18 silos was approved under N6/2015/0293/LP and N6/2015/0294/PP.

The site lies circa 250m east of the closest Area of Archaeological Significance, an area of Late Iron Age/Early Romano-British occupation in the vicinity of Church Road (HER no. 199). A further area of Late Iron Age/Early Romano-British settlement (HER nos. 858 & 2808) lies near Shortlands Green and Salisbury Gardens, approximately 500m to the east of the proposed development site.

There is therefore some potential for later prehistoric and/or Roman archaeology at this location. It is possible, however, that such remains may have been truncated or disturbed by 20th century development. The development area has been subject to large-scale earth movement and the foundations of the existing and former industrial buildings on site are likely to have had a detrimental effect on any archaeology that may have been present. Significant archaeological remains are known to survive under large industrial structures in Hertfordshire, however, such as at GlaxoSmithKline in Ware, and Bircherley Green shopping centre in Hertford.

Normally, for a development of this size in comparatively close proximity to archaeological remains such as at the Church Road and Shortlands Green sites, we would advise that a trial trenching evaluation take place prior to the determination of any planning application. In this instance, however, due to the likely effect of the industrial buildings on potential archaeological remains at this site, we believe it is reasonable to recommend that the evaluation take place post consent, prior to groundworks taking place on site.

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 building recording of the Shredded Wheat Factory and its silos prior to the commencement of any development, to a minimum of Historic England Level 3. Given that this has apparently already been carried out the report needs to be submitted to the LPA.
2. The evaluation, via trial trenching, of the development area prior to the commencement of any new development but post demolition of the existing structures on site.
3. Such appropriate mitigation measures indicated as necessary by that evaluation. These may include:

- a) the preservation of any archaeological remains *in situ*, if warranted;
 - b) the appropriate archaeological excavation of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results;
 - c) 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);
4. 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.
 5. 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 required 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,

Daniel Phillips BA ACIFA
Historic Environment Advisor, Hertfordshire LEADS
Growth and Infrastructure Unit

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