



St Albans City and District Local Plan Examination

MATTER 7 – RESIDENTIAL SITE ALLOCATIONS

ISSUE 1 – ST ALBANS SITE ALLOCATIONS

Historic England, Hearing Statement

September 2025

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

Introduction

this statement addresses the inspector's questions with regards Matter 7 – residential site allocations

This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan, and the SoCG between Historic England and St Albans City and District Council.

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Policy M3 – Bedmond Lane

Q4 Is Policy M3 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?

We consider that Policy M3 is **not justified** and therefore **not sound**, due to insufficient evidence regarding the archaeological potential of the site. Specifically, the allocation lacks adequate field evaluation to understand the risk of significant Roman remains, including burials, which may be present across the site.

As noted in our Regulation 19 response, the site lies between two Roman roads leading into the Roman city, a location typically associated with Roman cemeteries. In the absence of further intrusive fieldwork, there remains a high risk that the site contains well-preserved Roman archaeology, including human remains, which could be of **equivalent significance to designated heritage assets**, as per **Footnote 75 of the NPPF**.

While the recent fieldwork (Targeted Archaeological Evaluation - Land at Bedmond Lane, St Albans, Hertfordshire AL3 4AH, September 2025, RPS) to identify the route of the Roman road is helpful, the scope of the assessment is too narrow, and has not adequately addressed the potential for burials or human remains. Paragraph 1.2 confirms this interpretation, stating that the two trenches and three test pits were “targeted as far as was possible over the conjectured route of a Roman road which is thought to pass through the site.” This limited approach does not adequately address the broader potential for burials across the site.

We asked the site agent to clarify what steps had been taken to rule out the presence of burials in the remainder of the site. In response, we were provided with the Desk-Based Assessment (DBA) submitted at the Regulation 19 stage. However, while informative, the DBA does not fully resolve our concerns regarding the potential for significant archaeological remains, particularly human burials, elsewhere on the site.

From the plans provided within the DBA, the large Iron Age ditch aka Wheeler’s Ditch is not necessarily a reliable boundary of the important activity; the plans indicate that although it might have been a straight boundary, its continuation across the site is drawn as conjectured or unclear (dashed line archaeological drawing convention) on the 1960s plan. Whether it turned or remained straight seems unclear. Secondly, we have only small investigation samples from the other side of the conjectured line of the ditch to show what was there in the Iron Age and Roman periods. There is a 1980s geophysical survey but no later intrusive work. Given the variety and density of Iron Age and Roman

activities highlighted in the DBA, we would not on current information rule out the south of the site as being archaeologically less significant than the north.

The DBA hasn't zoned the site (possibly because so much is either unknown or already excavated) but its overall conclusions anticipate "a good level archaeological survival across the site". Further it states:

4.9 It is possible that archaeological remains could be present within the site, and on the basis of the above, any remains, should they occur on the study site, could in the context of the Secretary of State's non-statutory criteria for Scheduled Monuments (DCMS 2013) possibly be of up to national significance and these could be deemed to be of equivalent significance to the surrounding scheduled monuments.

Given this, we are not convinced that even partial development of the site is justified on current understanding. The policy is therefore **not consistent with national planning policy**, particularly paragraphs 207 and 212 of the NPPF, which require that the significance of heritage assets be properly understood and that harm be avoided unless clearly justified.

Recommended Modification: To make the Plan sound, we recommend that **Policy M3 be removed from the allocation** unless and until further **appropriate field evaluation** is undertaken to determine the presence and significance of archaeological remains, particularly Roman burials. This evaluation should be sufficiently broad in scope to assess the entire site, not just the conjectured Roman road route