

INTERNAL CONSULTATION

FROM: Archaeology - Simon West	TO: Ruth Ambrose
PLANNING APPLICATION NO: 5/20/1992	DATE: 6 November 2020
DETAILS: Outline application (access sought) - Construction of up to 100 dwellings together with all ancillary works	
ADDRESS: Roundhouse Farm, Bullens Green Lane, Colney Heath, St Albans	

RECOMMENDATION

Refusal based on a lack of information and non-compliance with the National Planning Policy Framework (NPPF, Section 16, para.189ff., pp.55).

ADVICE/COMMENTS

There are no nationally or locally designated areas of archaeological significance on this site. The application includes a Heritage Statement which is good practice and compliant with the NPPF.

The applicant has undertaken a map regression exercise (Non-technical Summary, S4) with the conclusion that the archaeological potential only relates to low level agricultural practice. Whilst a geophysical survey has been undertaken, this only partially covers the area of the application, but has been considered enough representation to characterise the whole area. The next section (S5) argues that because the modern maps and a partial geophysical survey do not indicate anything of significance on site, the impact, which is considered to be total, is only likely to be limited. An assessment on Google maps appears to indicate that there are features on site, such as a field boundaries or linear tracks and possible circular features that will require testing.

The archaeological assessment work, to help define the nature and characterise the site did not include any maps held by County or aerial photographs held by the HEA based in Swindon (Archaeology and Heritage Assessment, 3.4, pp13) due to current restrictions. However, information was used from the Hertfordshire Historic Environment Record (HER), other online maps and documents and the National Heritage List for England. A one-kilometre radius was used for the search parameters which is probably enough.

Pre-application discussions included a need for a Heritage Statement and a trial trenching survey. These would allow for a sound, reasoned and informed archaeological decision on any application and as good risk management would help to minimise the unexpected. Without sufficient information there is the risk that significant archaeology could be uncovered, requiring mitigation measures such as preservation in situ or excavation. This could severely impact on the timetable and have financial implications for the development. The trial trench survey has not been undertaken. Therefore, the limited geophysical survey has not been 'truth tested' which, along the varying nature of the local geology, has thereby not allowed some assurance as to the validity of the results.

A walkover had been undertaken on site. This concluded that agriculture will have had:

"...an adverse impact on the conservation and condition of any below ground features, deposits or remains of archaeological interest that may be present; limiting their significance as a consequence." (Archaeology and Heritage Assessment, 4.50, pp.)

However, this assumption is not founded on any below ground evidence. Likewise, it is possible to demonstrate significant survival of buried archaeology in areas of intensive agricultural practice elsewhere in the District. Without an evaluation, it is impossible to demonstrate the presence, level of survival or significance of any below ground deposits.

The Assessment concludes that:

(the) Implementation of the (albeit illustrative) masterplan would result in the all but complete loss of any archaeological remains which may be present at the site

Without understanding, what the complete loss to the finite archaeological resource would mean, it is not possible to make an informed decision. This informed decision requires data, from a full evaluation of the site which does not accompany this application. In consequence, it is not possible currently to make such a decision. If a premature decision was to be made, it could seriously impact on the development if significant archaeology was uncovered at a later date, and/or result in the loss of a finite resource without recording or protection.

CONDITION

If the application were to be approved, the following conditions are requested:

1.) Archaeological Investigation

No development-related works shall take place within the site until a written scheme of archaeological work (WSI) has been submitted to and approved in writing by the Local Planning Authority. This scheme shall include on-site work, and off-site work such as the analysis, publication, and archiving of the results, together with a timetable for completion of each element. A public engagement strategy should also be produced. All works shall be carried out and completed in accordance with the approved scheme, unless otherwise agreed in writing by the Local Planning Authority. This must be carried out by a professional archaeological/building recording consultant or organisation in accordance with the agreed written scheme of investigation.

Reason:

To ensure adequate opportunity is provided for archaeological research on this historically important site. To comply with Policy 111 of the St Albans District Local Plan Review 1994 and the National Planning Policy Framework. To ensure the appropriate identification, recording and publication of archaeological and historic remains affected by the development.

2.) Publication and Dissemination

Following the completion of the fieldwork and the post-excavation assessment in Condition 1, appropriate resources will be agreed with the LPA for the post-excavation project generated by the archaeological WSI in Condition 1. This will include all necessary works up to and including an appropriate publication and archiving and will include an agreed timetable and location for that publication.

Reason:

To ensure adequate opportunity is provided for archaeological research on this historically important site. To comply with the National Planning Policy Framework. To ensure the appropriate publication of archaeological and historic remains affected by the development.

