

Ben Glover
Development Control
North Hertfordshire District Council

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Contact Andy Instone
Tel 01992 555241
My ref P01/22/2455-4
Your ref **24/02455/FP**
historic.environment@hertfordshire.gov.uk

Date: 7 February 2025

Dear Ben,

Re: Proposed solar farm measuring 35.5 hectares with associated battery storage and ancillary infrastructure | Land Opposite Wymondley Grid Station And To The South Of Sperberry Hill St Ippolyts Hertfordshire

ARCHAEOLOGICAL IMPLICATIONS

Thank you for consulting us on the above application.

We have tried to contact you regarding our advice for this planning application, but without success. Therefore, we offer the following advice so that there is something on record.

We were consulted on planning application 22/00709/FP, a similar development on the same site and gave the advice noted below. This is similar to advice given for application 21/03380/FP.

The works to discharge the archaeological conditions attached to 21/03380/FP have commenced. In light of this we recommend that should you decide to attach archaeological conditions in this instance, that the term *no dig* is amended to include *no dig and/or no development* on the advice of this office when the results of the initial archaeological investigations to discharge those planning conditions are available, and also that these areas may be extended and or/augmented by others should this archaeological information warrant it.

Advice given for application 22/00709/FP:

“The proposed development site is of substantial size (c.35.5 ha), and in a topographically suitable location for settlement, in a part of the county that has continually produced very significant archaeological remains from most periods.

The site contains part of an Area of Archaeological Significance (AAS) as identified in the Local Plan and it is adjacent to another. These contain cropmarks shown on aerial photos which may represent prehistoric ring ditches (i.e. the remains of Bronze Age burial mounds [Historic Environment Record no's 4404, 6118, 6119, 6120, 6121, and 6123]).

In 2015 a geophysical survey was carried out on the western part of the proposed development site (west of Little Almshoe Lane), prior to the determination of planning application ref 15/01532/1.

The geophysical survey identified five ring ditches within a large enclosure, apparently with a trackway entering at the south end, in the north-western corner of the site, in the field south of Sperberry Hill [HER 31052].

The subsequent evaluation covered only the south-western portion of the site (west of Little Almshoe Lane, south of the HV cables) as the northern area had then been removed from development. This revealed archaeological features in 9 of the 20 trenches opened, with substantial evidence of activity identified in the south-western area of the site, in particular. The dating evidence suggests two phases of significant activity, one dating to the Late Iron Age/Early Roman period (AD10-100). This lay to the east of a probable trackway identified by the geophysical survey, and consisted of pits and ditches. The other, comprising post holes, occupation layers and rubbish pits, lay west of the probable trackway and dated to the Early Roman period (AD 50-120).

Following the pre-application advice previously provided by this office (21/02334/PRE), the eastern portion of the proposed development site (east of Little Almshoe Lane), was subject to a geophysical survey in 2021 which revealed several linear trends which are possibly of archaeological origin. These can be interpreted as ditches and a possible track.

The same pre-application advice also recommended a trial trenching evaluation of this portion of the site, which has not yet been carried out. The area to the north-west of the site (north of the HV cables) has also been brought back into the latest development proposals. As such, it is likely that significant remains of archaeological interest remain across the development area.

Having discussed in detail the archaeological constraints with all stakeholders, this office believes an iterative process of mitigation methodology is possible, should planning consent be granted. This process will include the reduction or removal of development impact on specific areas through the adoption of a no-dig policy where necessary and archaeological trial trenching throughout the site with the scope for further in-depth archaeological advisory input from this office for further potential mitigation.

From the limited evaluation which has already taken place, sensitive prehistoric archaeology has been uncovered in and around the Area of Archaeological Significance to the south-west of the site, therefore no further excavation for archaeology or development within this area should be undertaken. The boundaries of this area should be defined in the Written Scheme of Investigation, and agreed with this office. As described in para.5.6.18 of the Planning Statement submitted with this application (Axis, Feb 22), the 'no-dig' solution should apply to both panels and cabling, and include the use of above-ground roads.

Following the evaluation of the remainder of the site (including the areas which were previously evaluated in 2015), there may be other portions of the site which this office

deems it necessary to mitigate through 'no-dig' solutions or through taking out of the development entirely.

Archaeological Brief (P01/22/0709/3)

I therefore consider that the position of the proposed development is such that it should be regarded as likely to have an impact on heritage assets of archaeological interest and I recommend the following Archaeological Brief, should you be minded to grant consent:

- 1. The protection and preservation of a defined area of substantial archaeology through a no-dig policy, as identified during the initial evaluation, which will include buffer zones determined by this office.*
- 2. The archaeological monitoring of all development works associated with the areas of no-dig to ensure compliance with Part 1.*
- 3. The archaeological field evaluation of the entire remaining development area, via targeted trial trenching at a 3% sample, informed by the results of the geophysical survey, prior to any development commencing.*
- 4. such mitigation measures as advised as necessary by this office based on the results of this evaluation.
These may include:*
 - a. the preservation of any remains in situ, if warranted, as advised by this office,*
 - b. appropriate archaeological excavation, including full open area excavation and recording of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results, as advised by this office,*
 - c. archaeological monitoring of the groundworks of the development (also including a contingency for the preservation or further investigation of any remains then encountered), as advised by this office,*
 - d. the categorisation of any areas as more suited to no-dig solutions, or to being removed from development completely,*
 - e. such other provisions as may be necessary to protect the archaeological interests of the site;*
- 5. 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, as advised by this office.*
- 6. The public dissemination of the results of the archaeological work in an accessible manor, as advised by this office.*

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 para. 205, etc. of the National Planning Policy Framework, relevant guidance contained in the National Planning

Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case an appropriately worded condition 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 demolition/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 and in accordance with the programme of work as set out in the Archaeological Brief (P01/22/0709/3). 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 demolition/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. “*

I hope that you will be able to accommodate the above recommendations.

Please do not hesitate to contact me should you require any further information or clarification.

Yours sincerely,

Andy instone
Senior Historic Environment Advisor, Hertfordshire LEADS
Environmental Sustainability

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