



GA2, land north of Great Ashby Environmental Statement

Chapter 7: Archaeology

Iceni Projects on behalf of
Picture Estates Limited

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ARCHAEOLOGY

Introduction

- 7.1 This chapter of the ES has been prepared by Icen Projects and presents an assessment of the likely significant effects of the Proposed Development with respect to archaeology. Above ground built heritage is considered in Chapter 8 of the ES.
- 7.2 This report provides the assessment methodology; the baseline conditions currently existing at the Site and in the surrounding area; the likely significant environmental effects Mitigation measures are identified, where appropriate, to avoid, reduce or offset any significant adverse effects identified and/or enhance likely beneficial effects. Taking into account the mitigation measures, the nature and significance of the likely residual effects are reported.
- 7.3 This chapter is supported by the following technical appendices:
- **Appendix 7.1:** 2025 Archaeological desk-based assessment (DBA) ⁱ,
 - **Appendix 7.2:** 2007 Geophysical Survey ⁱⁱ,
 - **Appendix 7.3:** 2022 Geophysical Survey ⁱⁱⁱ
 - **Appendix 7.4:** 2008 Trial Trench Evaluation Report for Tile Kiln Farm, Stevenage ^{iv} and
 - **Appendix 7.5:** 2024 Trial Trench Evaluation Report for Land at North East Stevenage ^v.

Competence

- 7.4 For a summary of the competence of the authors of this chapter, please see **Appendix 1.6**.

Legislation and Policy Context

Legislation Context

- 7.5 The following national legislation is relevant to the Proposed Development:
- Ancient Monuments and Archaeological Areas Act (1979)^{vi}

National Planning Policy

- 7.6 The following national planning policy is relevant to the Proposed Development:
- National Planning Policy Framework (NPPF) (December 2024, updated in 2025)^{vii}; and

- Planning Practice Guidance (2023)^{viii}.

Local Planning Policy

7.7 The following local planning policies are relevant to the Proposed Development:

- Policy HE4 of the North Hertfordshire Local Plan 2011 – 2031^{ix}

Guidance

7.8 A summary of the technical and professional guidance that informed the assessment, and its methodology is provided below:

- Chartered Institute for Archaeologists' Code of Conduct (revised 2025);
- Chartered Institute for Archaeologists (CIfA) 'Standard and Guidance for Historic Environment Desk-based Assessment' (2020);
- English Heritage 'Conservation Principles: Policies and Guidance' (2008);
- Historic England's 'Managing Significance in Decision-Taking in the Historic Environment. Historic Environment Good Practice Advice in Planning: 2' (2015)
- Historic England's Statements of Heritage Significance: Analysing Significance in Heritage Assets, Advice Note 12 (2019);
- Historic England's Deposit Modelling and Archaeology, Guidance for mapping buried deposits (2020);
- Historic England's Geoarchaeology, Using Earth Sciences to Understand the Archaeological Record (2015);
- Management of Research Projects in the Historic Environment. The MoRPHE Project Managers' Guide (2015); and,
- Principles of Cultural Heritage Impact Assessment in the UK (2021).

Assessment Methodology and Significance Criteria

7.9 This section presents the methodology used to assess the potential effects of the Proposed Development in relation to Archaeology.

Consultation

7.10 **Table 7.1** presents a summary of the comments raised in the EIA Scoping Opinion, together with other consultee responses raised during separate discussions.

Table 7.1: Summary of Comments Raised in the Scoping Opinion

Consultee	Comment	Response
Hertfordshire Natural, Historic and Built Environment Advisory Team (Senior Historic Environment Advisor)	The applicant should include within the ES the reports on the previous archaeological work carried out (the existing geophysical survey reports (Stratascan, 2007 and Magnitude Surveys, 2022) and archaeological evaluation report (Oxford Archaeology East, 2008). The ES should also be supported by a report on the results of the further archaeological trial trench evaluation of the site, and by an Archaeological Desk Based Assessment, as outlined in the Scoping Report Section 12.10.	The results of two geophysical surveys and the results of two trial trench evaluations have been assessed and incorporated into the DBA and ES Chapter. All sources alluded to in the Scoping Opinion have been incorporated in the archaeological DBA which is included in Appendix 7.1. A draft of the 2024 evaluation report was issued to the Senior Historic Advisor in November 2023. The document was edited and reissued in August 2024. The document was deemed a sufficient initial assessment of the potential and significance of any archaeology on the Site.

Assessment Methodology

Study Area

- 7.11 To assess the archaeological potential within the Site, Historic Environment Record (HER) data has been obtained from the Hertfordshire HER for a 1km Study Area from the Site Boundary. The Hertfordshire HER data are an extensive collection of information relating to Hertfordshire's heritage, from the earliest human occupation to the present day. The 1km Study Area was recommended by the Historic Environment Officer at the Hertfordshire HER in order to accurately assess the archaeological potential and significance of the Site.
- 7.12 The Study Area and Hertfordshire HER data have been examined to locate known archaeological material and assess and inform the likely potential and significance of archaeology on the Site. Above ground historic structures (built heritage) are not specifically considered within this chapter except where they are relevant to the archaeological interpretation of the Site. An assessment of the likely significant effects of the Proposed Development on built heritage is included in **Chapter 8** and **Appendix 8.1** of the ES.
- 7.13 The impact area of the Proposed Development is considered to be the extent of the Site.

Establishing Baseline Conditions

Existing Baseline

- 7.14 The archaeological baseline has been established and assessed using the HER data and other available sources, including reports on previous archaeological investigations on the Site (See

Appendix 7.1) and a geophysical survey (**see Appendix 7.3**) and trial trench evaluation (**see Appendix 7.5**) undertaken in support of the current planning application. This data enables not only the assessment of known heritage assets which may be affected by the Proposed Development but also informs the predication of potential assets on Site and their likely significance. This informed the analysis of the likely effects of the Proposed Development on known and unknown buried heritage assets.

7.15 Icení Projects prepared an archaeological DBA (**Appendix 7.1**) which assessed the potential presence and significance of archaeological assets on the Site and within the 1km Study Area of the Site boundary. This was supported by drawing on a range of sources available, including:

- Site Reports – Reports on past archaeological investigations on the Site (**see Appendices 7.2-7.4**).
- HER data for records of designated and non-designated heritage assets (archaeological sites, monuments and find spots, as well as the locations of listed buildings and previous archaeological investigations); Historic England Datasets - Information on statutory Designated Assets data including The National Heritage List for England^x, Archaeological Records, World Heritage Sites, Scheduled Monuments and listed buildings;
- British Geological Survey (BGS) - Solid and Drift geology digital mapping and geological borehole data where applicable^{xi}, along with the results of the Site Investigation (**see Appendix 7.1**);
- Ordnance Survey (OS) maps from their historic first edition through to modern OS mapping. Digital versions of the earlier historic maps were identified online and examined;
- Aerial photography was examined at Historic England's Aerial Photo Explorer^{xii}; and
- Site visit in August 2023, which included as an assessment of the topography and ground disturbance and the existing land use.

7.16 The archaeological DBA was undertaken pursuant to professional guidance, issued by ClfA and with regard to legislation and policy considerations, and present an assessment of the likely effects resulting from the Proposed Development on potential buried assets using the above sources.

Future Baseline

7.17 In the event of the Proposed Development not going ahead, the archaeological baseline would remain unchanged as the land uses of the Site. The sources of information referenced above is therefore considered applicable to establishing the future baseline conditions of the Site.

Demolition and Construction Assessment Methodology

- 7.18 The methodology for assessing the likely significant effects during demolition and construction involves qualitatively analysing likely impacts on potential below ground heritage assets. All types of intrusive, below ground works that would occur as part of the Proposed Development will have the potential to negatively impact on any surviving below ground archaeological remains within the footprint. These include, but are not limited to, earthworks and ground reprofiling, demolition of existing structures on the Site and construction of buildings and associated infrastructure. Mitigation strategies outlined in this chapter, such as the implementation of an archaeological site investigation, are proposed to reduce adverse effects during demolition and construction.

Significance Criteria

- 7.19 The scale attributed to each effect has been determined based on the sensitivity of the receptor and magnitude of impact arising as a result of the Proposed Development. Professional judgement and experience have been drawn upon to assess the scale and significance.

Receptors and Receptor Sensitivity

- 7.20 Receptors comprise known and unknown archaeological assets, such as World Heritage Sites, Scheduled Monuments and designated and non-designated heritage assets. Their potential presence is given in the baseline section of this chapter and is further detailed in the archaeological DBA (**Appendix 7.1**).
- 7.21 In line with the NPPF, for the purposes of this ES chapter, archaeological 'receptors' are referred to as 'buried heritage assets', and heritage 'significance' is used in place of 'sensitivity'. The use of heritage 'significance' and 'significance of (environmental) effect' are clearly differentiated throughout.
- 7.22 The significance of each receptor was evaluated as being high, medium, low or very low based on a review of the baseline position of each receptor and its performance against benchmark areas. The receptors and the definition of sensitivity of a receptor (high, medium, low, very low) is based on a scale set out in **Table 7.2**. Each buried heritage asset is assessed on an individual basis and considers regional variations and individual qualities of sites.

Table 7.2: Receptor Sensitivity Description

Value (level of buried heritage asset significance)	Description
High	World Heritage Sites, Scheduled Monuments, Grade I, Grade II* listed buildings, Registered Parks and Gardens, Protected Wrecks, Heritage assets of national Importance.

Medium	Conservation Areas, designated historic battlefields, Grade II listed buildings, burial grounds, protected heritage landscapes such as ancient woodland, heritage assets of regional or county importance.
Low	Heritage assets with district level cultural or education value, locally listed buildings.
Very Low	Heritage assets with a local level cultural or education value only.

- 7.23 The significance of each receptor was evaluated as being high, medium, low or very low based on a review of the baseline position of each receptor and its performance against benchmark areas. A list of existing receptors is included in **Table 7.5**.

Magnitude of Impact

- 7.24 The magnitude of impact to a receptor has been determined by considering the estimated deviation from baseline conditions both before, and, if required, after mitigation. The scale used for determining the magnitude of an impact has been based on **Table 7.3**.

Table 7.3: Magnitude of Impact Description

Impact Magnitude	Description
High	Total loss or major/substantial alteration to key elements/features of the baseline (pre-development) conditions such that the post development character/composition/attributes will be fundamentally changed.
Medium	Loss or alteration to one or more key elements/features of the baseline conditions such that post development character/composition/attributes of baseline will be materially changed.
Low	A minor shift away from baseline conditions. Change arising from loss/alteration will be discernible/ detectable but not material. The underlying character/composition/attributes of the baseline condition will be similar to the pre- development circumstances/situation.
Very Low	Very little change from baseline conditions. Change barely distinguishable, approximating to a “no change” situation.

Assessing Significance

- 7.25 **Table 7.4** provides a matrix for determining the significance of an effect based on the sensitivity of the receptor and the magnitude of impact.

Table 7.4: Significance of Effect Matrix

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Very Low
High	Major Beneficial / Adverse	Major Beneficial / Adverse	Moderate Beneficial / Adverse	Minor Beneficial / Adverse

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Very Low
Medium	Major Beneficial / Adverse	Moderate Beneficial / Adverse	Minor Beneficial / Adverse	Negligible
Low	Moderate Beneficial / Adverse	Minor Beneficial / Adverse	Negligible	Negligible
Very Low	Minor Beneficial / Adverse	Negligible	Negligible	Negligible

- 7.26 Effects classified as major or moderate are considered ‘significant’ in EIA terms. Effects classified as minor or negligible are considered ‘not significant’ in EIA terms.

Limitations and Assumptions

- 7.27 The presence of and significance of below ground archaeological remains is often uncertain, until their nature and extent has been sufficiently determined through archaeological evaluation. Notwithstanding, the assessment methodology is considered robust, utilising reasonably available information, and conforms to the requirements of guidance and planning policy. In addition, the assessment has been undertaken by a suitably qualified individual, incorporating their professional judgement.

Baseline Conditions

- 7.28 A description of the archaeology and history of the Site, along with maps, Site plans and images are provided in the archaeological DBA located in **Appendix 7.1**. All references to archaeological interventions, findspots and monuments referenced from the HER are contained within parenthesis throughout the archaeological DBA.

Existing Baseline Conditions

Existing Impacts

- 7.29 Historic and modern ploughing, existing track and roadways the existing electricity pylons, along with drainage and pipes which pass through the Site may have adversely affected the survival of archaeological remains, if present.

Geology

BGS records show the Site is underlain by Lewes Nodular Chalk and Seaford Chalk Formation. Superficial Head Deposits are present across the central and southeast of the Site, with Lowestoft Formation recorded in the southwest of the Site, as well as along the north-eastern boundary.

The results of the geotechnical Site Investigation are in accordance with the expected sequence (see **Appendix 7.1**).

Designated Heritage Assets

- 7.30 The Site and Study Area do not contain any designated heritage assets.

Non-designated Heritage Assets

Prehistoric Period

- 7.31 Trial trenching on the Site encountered very limited evidence for prehistoric activity, comprising one isolated potentially late Iron Age (or early Roman) pit identified during the 2008 trial trench evaluation (trench 20), and a single residual Mesolithic flint tranchet axehead recovered from the subsoil during the 2023 evaluation. The scarcity of prehistoric remains identified during the trial trench evaluations in both 2008 and 2023 indicate that the Site was likely away from any major foci of settlement during the prehistoric period.

Roman

- 7.32 The previous trial trenching on the Site found limited evidence from the Roman period, indicating only a low-level 'background' presence. Most of the small quantity of Roman pottery found during the two evaluations of the Site were considered to be residual in later features, the only exception being the single isolated pit identified in the 2008 evaluation (trench 20), which may potentially date to the early Roman period, and a pair of ditches or structural features in the south of the Site identified during the 2023 evaluation (trench 102), which contained burnt flint, charcoal, chalk and burnt stone, which may potentially date to the Roman period.

Medieval

- 7.33 The 2008 trial trenching in the northwest of the Site recorded a series of features dating to the medieval period, interpreted as representing evidence for tile production and nearby settlement (in the vicinity of trench 11), immediately to the south of Tile Kiln Farm, and a possible medieval field system. A quarry pit in the north-eastern part of the Site identified in the 2023 evaluation may be part of this same pattern of activity, so too may be the scattering of undatable ditches and pits identified across the Site, although these features may alternatively be post-medieval in date.

Post-medieval

- 7.34 The previous evaluations at the Site implied there was limited evidence for post-medieval activity, with few features of definite post-medieval date. A post-medieval feature in the west of the Site recorded during the 2023 evaluation may have represented a trackway.

Previous Archaeological Investigations on the Site

- 7.35 The Site has been subject to several archaeological investigations, comprising geophysical surveys in 2008 and 2022, and trial trench evaluations in 2008 (covering the north-western portion of the Site only) and 2023 (covering much of the remainder of the Site).
- 7.36 A geophysical survey was undertaken for part of the Site in 2008, which identified a limited number of anomalies of possible archaeological origin (see **Appendix 7.2**).
- 7.37 In 2008, Oxford Archaeology undertook a trial trench evaluation (42 trenches) on the land adjacent to Tile Kiln Farm, which encompasses the north-western portion of the current Site (see **Appendix 7.4**). This identified an area of possible medieval settlement in the north of the Site, evidence for medieval tile manufacturing, and a possible medieval field system. Additionally, a single isolated pit dating to the late Iron Age or early Roman period was identified. A number of undated ditches, pits and postholes were also recorded.
- 7.38 A Heritage Impact Assessment was additionally undertaken by Heritage Network in 2016^{xiii}.
- 7.39 As part of the current planning application, a geophysical survey was carried out across, covering an area of an area of 45.65ha (see **Appendix 7.3**). A series of linear and curvilinear anomalies were identified across the survey area, along with a number of discrete anomalies. In the northwest of the Site (in the area of the previous 2008 evaluation), a weak rectilinear anomaly was identified within a natural spread. A further series of negative linear anomalies of undetermined origin were identified in the southeast of the Site.
- 7.40 As detailed in the above section, a further trial trench evaluation (72 trenches) was undertaken in 2023 as part of the current planning application (see **Appendix 7.5**). The evaluation identified relatively few archaeological remains across the Site: a single residual prehistoric artefact (Mesolithic flint tranchet axehead), a small quantity (eight sherds) of mostly residual Roman pottery, a potentially medieval or post-medieval quarry pit (likely associated with the tile production activity identified during the 2008 evaluation), a post-medieval trackway, and a small number of undated cut features.
- 7.41 Taken together, the results of the previous phases of investigation indicate the presence of limited archaeological remains across the Site as a whole. Of the 114 trenches excavated across the two evaluations, 80 (70%) were either blank or only contained features of natural origin. Of the 34 trenches that did contain archaeological remains, 6 contained features dated to the medieval period (all located in the north-western section of the Site), 2 trenches identified cut features potentially dating to the Roman period (trench 102 in the south of the Site and trench 20 in the north-west, the latter may possibly date to the late Iron Age), 3 trenches contained post-medieval features, and the remaining 23 trenches contained undated cut features that were largely devoid of artefacts.

Future Baseline

- 7.42 In the event that the Proposed Development is not implemented, the archaeological baseline of the Site would remain unchanged and as described above as the land use and activity are not expected to change.
- 7.43 Below ground demolition and construction on other cumulative schemes as listed in **Chapter 17** of this ES have the potential to negatively impact any below ground archaeological remains that may be present on these sites. Those situated within the Study Area of the archaeology assessment have the potential to contain similar remains to those that may survive on the Site. It is assumed that the effects of the cumulative schemes would not affect any below ground archaeological remains that may survive on the Site.

Summary Receptors

- 7.44 A summary of the of existing receptors is included in **Table 7.5**.

Table 7.5: Existing and Future Sensitive Receptors

Receptor	Sensitivity
Existing Receptors	
Prehistoric Remains	Low
Roman Remains	Low
Medieval Remains	Low
Post-medieval Remains	Very Low

Assessment of Likely Significant Effects

Construction

- 7.45 Full Detailed design and construction methodology is not available at the current stage, as the development is currently at an early design stage, although the indicative construction activities are set out in **Chapter 3** and described below. Some of the proposed new structures are likely to have elements extending below ground level.
- 7.46 All types of intrusive, below ground works that would occur as part of the Proposed Development will have the potential to negatively impact on any surviving below ground archaeological remains within their footprint. The following indicative activities during the construction phase have the potential to affect buried remains:
- earthworks and ground re-profiling, primarily in relation to excavation below ground level to facilitate drainage and flood mitigation;
 - new construction access;

- obstruction clearance prior to construction;
- construction of buildings, including associated infrastructure, drainage features/SuDS and utilities; and
- foundations for the new structures.

- 7.47 Within the maximum extent of the development parcels of the Proposed Development, as shown in **Appendix 3.1**, the buildings are likely to have foundations extending below ground level, including piles and pile caps. The installation of buried services, landscaping, ground raising and any resurfacing would also have a below ground impact.
- 7.48 It is expected that any intrusive, below ground work carried out during the construction phase will have the potential to result in a **high magnitude of change** to any archaeological receptor located within the footprint of such activities
- 7.49 All impacts on buried heritage assets comprise the removal or disturbance of the asset or parts of the asset and have to be considered adverse, direct, permanent, and irreversible.
- 7.50 In consideration of the receptor Sensitivity presented in **Table 7.5**, the likely significant effects before additional mitigation would be classified as **moderate adverse** for prehistoric, Roman and medieval remains (**significant**), and **minor adverse** for post-medieval remains (**not significant**).

Mitigation Measures

Additional Evaluation

- 7.51 To fully inform the required mitigation measures, an additional phase of geophysical survey and archaeological trial trenching evaluation will be carried out, in accordance with a method statements, or Written Schemes of Investigation (WSI), within the Habitat Creation Area/BNG, to be carried out post-determination and addressed through planning condition. Scope and extent of this additional phase of trial trenching will be discussed with the Archaeology Advisory Team to the LPA, and will be proportionate to the archaeological potential, and the expected impact arising from the Proposed Development.

Construction

- 7.52 As a result of the conclusions of the trial trenching undertaken on the Site and, in accordance with the NPPF and the Local Plan, the LPA will attach an archaeological condition should planning permission be granted, to facilitate a programme of archaeological mitigation prior to construction.
- 7.53 Potential adverse impacts to buried archaeological remains during the construction works could be successfully mitigated by a programme of archaeological investigation secured via an appropriately worded pre-commencement condition. Given the results of the previous evaluations at the Site it is

expected that archaeological preservation by record will be required. This could comprise a combination of limited excavation and recording, to be carried out prior to the commencement of below-ground works associated with the Proposed Development, and archaeological watching brief on intrusive groundworks during construction as needed.

- 7.54 The method statements, or WSI, detailing the archaeological site investigations would be developed in consultation with the Archaeology Advisory Team to the LPA and submitted against the relevant condition followed by the results of the work. If significant archaeological remains are encountered, the assessment, publication and archiving of the results may also be required. Mitigation and subsequent public dissemination of the results would be an appropriate strategy to offset the adverse effects (defined pre-mitigation) on archaeology, if found to survive on the Site. The likely residual effects after mitigation will be permanent and be of Minor Adverse for prehistoric, Roman and medieval remains and Negligible post-medieval remains. This would extend across areas of the Site where below ground impact would occur.

Residual Effects and Monitoring

- 7.55 The residual effects arising from the Proposed Development are summarised in **Table 7.6** below.

Table 7.6: Summary of Residual Effects

Effect	Receptor (Sensitivity)	Nature of Effect and Geographic Scale	Magnitude of Impact	Likely Effect of Proposed Development (including embedded mitigation but before additional Mitigation)	Mitigation and Monitoring	Likely Residual Effect of Proposed Development
Construction Effects						
Damage/loss of prehistoric remains	Prehistoric (Low)	Permanent, Site-wide	High	Moderate Adverse (Significant)	Archaeological mitigation	Minor Adverse (not Significant)
Damage/loss of Roman remains	Roman (Low)	Permanent, Site-wide	High	Moderate Adverse (Significant)	Archaeological mitigation	Minor Adverse (not Significant)
Damage/loss of medieval remains.	Medieval (Low)	Permanent Site-wide	High	Moderate adverse (Significant)	Archaeological mitigation	Minor Adverse (not Significant)
Damage/loss of post-medieval remains.	Post-medieval (Very Low)	Permanent Site-wide	High	Minor Adverse (not Significant)	Archaeological mitigation	Negligible (not Significant)

Likely Significant Effects

- 7.56 Likely significant effects to archaeological assets that may survive on the Site are limited to the demolition and construction works. All construction activity that has a below ground impact has the potential to adversely impact archaeological remains (where present) by causing disturbance, total or partial removal. It is anticipated that any potential adverse impacts to archaeological deposits during the construction phase could be successfully mitigated by a program of archaeological mitigation by record, reducing the significant residual effects to Negligible or Minor Adverse, which in EIA terms are Not Significant.

References

- ⁱ Iceni Projects, 2025, Land Northeast of Stevenage, Hertfordshire. Archaeological Desk-based Assessment
- ⁱⁱ Stratascan, 2007, Geophysical Survey Report. Land Northeast of Stevenage, Hertfordshire
- ⁱⁱⁱ Magnitude Surveys, 2022, Geophysical Survey Report. Land Northeast of Stevenage, Hertfordshire
- ^{iv} Oxford Archaeology, 2008, Tile Kiln Farm, Stevenage. Archaeological Evaluation Report
- ^v Oxford Archaeology, 2024, Land at Northeast Stevenage Great Ashby, Hertfordshire. Archaeological Evaluation Report
- ^{vi} <https://www.legislation.gov.uk/ukpga/1979/46>
- ^{vii} DLUHC, December 2024, updated 2025: National Planning Policy Framework
- ^{viii} DLUHC, 2023: Planning Practice Guidance
- ^{ix} North Hertfordshire Council, North Hertfordshire Local Plan 2011-2031
- ^x <https://historicengland.org.uk/listing/the-list/>
- ^{xi} BGS (British Geological Survey), 2024 GeoIndex Onshore, <https://mapapps2.bgs.ac.uk/geoindex/home.html>
- ^{xii} <https://historicengland.org.uk/images-books/archive/collections/aerial-photos/>
- ^{xiii} Heritage Network, 2016, AREA GA2 North-East Stevenage Hertfordshire, Heritage Impact Assessment.