

APPENDIX 3

COMMENTS ON ARCHAEOLOGICAL IMPLICATIONS

Environment + Commercial Services
Director: John Wood



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Contact: Mrs KS Batt
My ref: KSB/12/LA2
Your ref: Old Town (LA2) –
Deliverability Study

26th September, 2012

Dear Richard,

**Re: DELIVERABILITY STUDY (AUGUST 2012)
OLD TOWN, HEMEL HEMPSTEAD (LA2)
Archaeological Implications**

Thank you for consulting me on the above document.

Please note that the following comments and advice are based on the policies contained in the National Planning Policy Framework and the PPS 5 Practice Guide which DCLG have formally confirmed is still active.

Having read the Deliverability Study (DS) I believe that for the following reasons, this document alone is insufficient to properly address the archaeological interest of the proposed allocation site. However, I believe there is no overriding archaeological constraint to development of this area, and therefore, the allocation of the site for development in the Core Strategy.

The DS does not mention the historic environment, or attempt to assess the impact of the proposed development on heritage assets with historic or archaeological interest. The important NPPF concept of archaeological interest is not addressed by the report and is of direct relevance to the proposed development on the site and its impact on heritage assets:

Archaeological Interest: an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. These heritage assets are part of a record of the past that begins with traces of early human and continues to be created and destroyed.

The PPS 5 Practice Guide explains how archaeological interest can apply to situations such as the Old Town site:



105. However, if the asset is, for example, a bare field that has never been investigated, but which is suspected to contain important remains, or an apparently ordinary building, that is believed to contain a hidden medieval frame, the task of managing it is different. In these circumstances it is the interests of a future expert archaeological investigation that need protecting. The prospects for that investigation may be harmed even by a minor disturbance of the soil or the modern brick skin. The context in which any archaeological evidence is found is crucial to furthering understanding

The proposed allocation site occupies an area of sloping land, currently managed predominantly as amenity grassland, overlooking the River Gade, and immediately abutting the northern edge of the old town of Hemel Hempstead.

The proposed development will occupy a site of approximately 2.8ha. The proposal includes housing to provide up to 80 units. The scale and type of development represents a significant threat to the significance of the archaeological interest of the site, which comprises the potential survival of buried archaeological structures, features and sediments.

The site is within the Gade valley which is one of the most archaeologically important river valleys in the county and which has a very high known density of heritage assets with archaeological and historical interest.

The site immediately abuts the northern edge of Area of Archaeological Significance (AAS) number 36. This notes that Hemel Hempstead is a medieval settlement recorded in Domesday Book as 'Hamelamstede'. The medieval core of the settlement (Hemel Hempstead EUS) is believed to extend to within a few tens of metres of the 'Old Town site' boundary. Also, a number of earthworks are visible on 2010 Hertfordshire vertical aerial photomaps. One linear bank is clearly modern, running parallel to Fletcher Way, however, the form and alignment of the remainder suggest a medieval or earlier origin (HER18267).

In addition, a number of Scheduled Monuments of Roman date are known from Hemel Hempstead. A villa at Boxmoor (SM27916), temple complex at Wood Lane End (SM27921), large barrow at High Street Green (SM27901), and notably a villa at Gadebridge (SM27881), which is sited on the opposing slope of the river valley, approximately 500m north-west of the 'Old Town site'. This, and evidence for several important Roman roads apparently converging, and a number of relatively recent archaeological discoveries, notably, Roman occupation (probably another villa site) at Spencer's Park (HER15191), suggest that this area was an important high status 'hinterland' to Verulamium.

Given the above, I believe that the site possesses moderate potential for the presence of heritage assets of archaeological interest, some of which may be a constraint on the design/layout of development.

In my opinion there is no overriding archaeological constraint to development of the 'Old Town site', and therefore, the allocation of the site for development in the Core Strategy. However, further archaeological assessment needs to be undertaken to determine an accurate level of significance for the site as a heritage asset. This should precede a planning application: it could be an important determinant of layout and is needed for the

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master plan stage. Assessment should include an archaeological desk-based assessment, and archaeological topographic survey. Based on the results of these investigations, further archaeological field evaluation may be required. Geophysical survey may prove useful in allowing a more targeted approach to archaeological trenching. The purpose of these studies is to establish whether there are any archaeological constraints on layout and whether any specific mitigation measures would be required to be undertaken before development can commence.

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

A handwritten signature in black ink, appearing to read "Kate Batt", with a long horizontal flourish extending to the right.

Kate Batt BSc(Hons)
Historic Environment Advisor