

E2.22

ES Appendix 9.3 - Heritage and Archaeology - Consultation

Authored by Cotswold Archaeology
November 2025

THE CROWN
 ESTATE

East Hemel

Appendix 9.3 Key Consultation Dialogue

Consultee	Type of consultation	Date of consultation	Application reference	Consultee comment	Where this is addressed within Cotswold Archaeology (CA) assessments
Richard Havis Principal Historic Environment Consultant (PHEC) St Albans District Council (SADC) Archaeological Advisor	Microsoft Teams Meeting	28/08/2024		<ul style="list-style-type: none"> • CA and PHEC commenced discussion to confirm targeted locations of next phase of trial trench evaluation. • PHEC asked that CA to liaise with Hertfordshire HER Officer on documents that may not be accessible as yet on HER and to review the Planning Portal for additional relevant archaeological reports. • PHEC noted that Archaeology should be scoped into the EIA not least because of the position of the Scheduled Iron Age Hillfort (Aubreys Camp), the setting of which should be considered within any desk based assessment. 	<ul style="list-style-type: none"> • See further consultation dialogue below for resolution of this topic. • Email request issued to Mark Landon (HER Officer) 20/09/2024 for a number of reports. Mark Landon suggested a search of the online ADS website for any additional reports since those not yet on the HER may be constrained by ownership copyright until formally included in the database. • Aubreys Camp was assessed in line with Historic England's settings guidance and was considered to experience no change to its significance as a result of the Development. See paragraphs 5.71-5.72 of the Built Heritage Assessment (Appendix 9.2).
	Microsoft Teams Meeting	03/10/2024		<p>This meeting followed email dialogue in the preceding days to set the scene for discussion on the extent and sample for proposed pre-determination trial trench evaluation. Key points arising comprised:</p> <ul style="list-style-type: none"> • The PHEC confirmed that the large central area of the Site comprises the former M1 Junction works compound area, which was stripped of topsoil / overburden at that time, and that he would expect no further archaeological works in that area. 	<ul style="list-style-type: none"> • Initial draft trench location plan and table was provided in advance of this meeting by email 02/10/2024. • The PHEC provided a rough location plan for additional areas to be considered for pre-determination trenching on 08/10/2024 to continue the process of discussion around confirming the final locations sufficiently well to inform the EIA. • Further assessment of Bottom House farmstead was undertaken and reported in the Archaeological Desk-Based Assessment (Appendix 9.1) See paragraphs 3.110 – 3.112 and associated figures.

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				<ul style="list-style-type: none"> The PHEC confirmed his intention to request 4% sample evaluation of the remaining areas of the Site yet to be evaluated. The PHEC also discussed the employment of a bespoke evaluation method in Field 19 (location of former Bottom House farmstead). This likely to comprise additional desk-based information if possible, a walkover visit to make a photo record, an earthwork survey if possible and test pit / trench evaluation. 	
	Microsoft Teams Meeting	09/12/2024		<p>This meeting followed email dialogue in the preceding days, and following the meeting of 03/10/2024, to confirm the final extent and areas for trial trench evaluation and the actual trench layout to depict a 4% sample within each of the identified areas / fields requiring pre-determination trenching. Key points arising comprised:</p> <ul style="list-style-type: none"> It was agreed on the PHEC's request that 30m trenches were to be utilised on grid system, adjusted when necessary to target geophysical survey anomalies / cropmarks etc. Also that this should be at 4% sample throughout fields identified for pre-determination evaluation and those at post-determination. The PHEC indicated that there would be a need to go back into fields which have previously been evaluated but have notable gaps in the layout – and 	<ul style="list-style-type: none"> The next stage of evaluation within the Site and its programming is noted in paragraphs 5.19 and 5.20 of the Archaeological Desk-Based Assessment (Appendix 9.1). A pre-determination trench plan was initially drafted by CA in January 2025 and provided, following discussions re land-use and access, for consultation to the PHEC on 27/05/2025. A Written Scheme of investigation (WSI) for the evaluation was issued to PHEC on 4 August 2025.

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				<p>that some infilling with new trenches might need to be undertaken.</p> <ul style="list-style-type: none"> It was noted to the PHEC by the Design team that whilst the evaluation programme will inform the decision-making process it may be that it is completed during the determination period and may not be presented to St Albans for consideration along with the ES submission. This is principally due to access constraints, cropping regimes and paddock usage. 	
	Email Exchange CA with PHEC	<p>27/05/2025 06/06/2025 19/06/2025</p>		<p>The completed draft trench location plan was provided to the PHEC on 27/05/2025. Email from PHEC 06/06/2025 confirmed acceptance / approval of the detailed draft evaluation trench location plan.</p> <p>PHEC also acknowledged that a recommendation in CA's email of a bespoke earthwork survey by drone on Field 19, supported by trench or test pit evaluation would be an appropriate methodology.</p> <p>He also requested that the draft Written Scheme of Investigation (WSI) be prepared.</p>	<p>The draft design specification (equating with the principal elements of the WSI) was prepared by CA and submitted to the PHEC for comment on 19/06/2025. This document was also issued to prospective archaeological contractors by the Client. The PHEC responded on 01/07/2025 with broad approval of the draft, with a few minor amendments. Nothing that would materially affect the proposed scope or methodology.</p>
Richard Havis Principal Historic Environment	Email Exchange (CA with PHEC and HEC) and Site meetings	Between end of July 2025 and present (ongoing)		PHEC and HEC commented on the WSI prepared by CAU and it was approved, in the second week of August (ahead of the start date on site on 20 August).	<ul style="list-style-type: none"> Comments on the WSI by CAU were received and addressed to ensure the WSI is approved and the evaluation can continue

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<p>Consultant (PHEC)</p> <p>And Katie Lee-Smith, Historic Environment Consultant (HEC)</p> <p>St Albans District Council (SADC) Archaeological Advisor</p>	<p>(PHEC/HEC with CA and Cambridge Archaeological Unit; CAU).</p>			<p>A number of site meetings with PHEC and HEC were carried out on:</p> <ul style="list-style-type: none"> - 27 August - 3 September - 10 September - 24 September - 1 October - 8 October - 15 October - 22 October <p>In addition, following completion of the earthwork survey in field 19, addendum to the WSI, specifying additional trenches, was agreed with HER. Following a meeting on 8 October it was also agreed that those trenches will be extended/tweaked to better capture potential remains.</p> <p>The site meetings focus on reviewing of all open trenches, discuss / confirm recording of exposed archaeological remains and agree backfilling as well as forward plans and further meetings.</p> <p>Furthermore, where agreed, remote sign off was implemented, when the advisor agreed it is not necessary to revisit the trenches, but the progress needs to be documented (this is being carried out via email between CA, CAU and HEC).</p>	<ul style="list-style-type: none"> • Evaluation work on site commenced on 20 August and is ongoing. • Addendum to the WSI was produced by CAU to capture additional trenching • All comments from the HEC and PHEC during the meetings and as per email correspondence are being addressed accordingly with features excavated and recorded before backfilling. • Results of the evaluation will be presented within a final report (to be produced by CAU) and they will be captured within an addendum to the ES
<p>Conservation Officers St Albans City &</p>				<p>CA issued initial introductory email to convene a Teams Meeting. Resultant dialogue confirmed a Teams Meeting</p>	<ul style="list-style-type: none"> • This introductory meeting confirmed our anticipated approach to the Built Heritage Assessment. SADC provided the weblink for the St Albans Local List of buildings and CA provided them with the

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District Council and also Dacorum Borough Council	Email Exchange / Microsoft Teams Meeting CA with SADC	13/08/2024 11/09/2024 16/09/2024 25/09/2024		<p>on 11/09/2024. See minutes / actions email of 16/09/2024 and SADC response 25/09/2024.</p> <ul style="list-style-type: none"> SADC noted that they had reviewed the Scoping Report for the earlier East Hemel scheme and considered it comprehensive. They highlighted two approved developments (Green Lane and Cherry Tree Lane) that should be taken account of as part of the cumulative assessment for the EIA. Also that the Development's Noise Assessment should inform CA's Built Heritage Assessment. SADC noted that Redbourn Conservation Area, and heritage assets within it are unlikely to experience any impact through change to setting. Hence the Development would be very likely to result in no significant effect through change to prevailing conditions. 	<p>assessment undertaken for the previous East Hemel application as well the draft ZTV and CA's emerging preliminary scoping figures showing the location of designated heritage assets within 1km of the site (plus Gorhambury just outside this study area).</p> <ul style="list-style-type: none"> Locally Listed Buildings were considered in the Built Heritage Assessment, in line with saved policy 87 of the District Local Plan Review 1994. Those noted have been identified by the Design team and are included in the proposed ES scope. Chapter 12 (Noise and Vibration, ES Volume 2) does not report any material effects, which would contribute to identified adverse effects reported in the Built Heritage Assessment.
Conservation Officers St Albans City & District Council and also Dacorum Borough Council	Email Exchange / Microsoft Teams Meeting	02/09/2024 18/09/2024 25/09/2024		<p>CA issued initial introductory email to convene a Teams Meeting. Resultant dialogue confirmed a Teams Meeting on 18/09/2024. See minutes / actions email of 25/09/2024 – <u>no confirmation by email of agreement of minutes recorded.</u></p> <ul style="list-style-type: none"> DBC noted that they considered the previous Heritage Statement to be extensive and detailed. Also, that 	<ul style="list-style-type: none"> CA provided a summary of our understanding of the built heritage resource, specifically in respect of the designated heritage assets that lie within the DBC boundary. The only designated heritage asset within DBC is the Grade II Listed Dell Cottage, which is assessed in the Built Heritage Assessment paragraphs 5.97-5.103 (Appendix 9.2). AVRs provided as part of the Landscape assessment and informed in part through consultation with Cotswold Archaeology have been

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	CA with DBC			<p>they would await more information on the proposed development (emerging masterplan and ZTV) to reach a better understanding of the which built heritage assets may be affected.</p> <ul style="list-style-type: none"> CA noted that the working with the Project's Landscape team would enable the identification and selection of key heritage viewpoints to be presented to inform the assessment process. DBC expressed the importance of this approach in support of our own suite of heritage-based assessment photographs. 	<p>reviewed and inform the conclusions of the Built Heritage Assessment.</p>
<p>Conservation Officers St Albans City & District Council and also Dacorum Borough Council</p>	<p>Email Exchange / Microsoft Teams Meeting</p> <p>CA with SADC & DBC</p>	<p>08/07/2025</p>		<p>A second Teams Meeting was convened with both the Conservation Officers for SADC and DBC on 08/07/2025. Martin Stickley, Principal Planning Officer for DBC also attended.</p> <ul style="list-style-type: none"> Both SADC and DBC are content with the coverage of built heritage assets that have been taken into consideration for assessment. It is understood, however, that the final <u>as built ZTV</u>, may result in a measure of reassessment (final impact assessment) of some of these. This may also result in a requirement for the preparation of additional Viewpoints, beyond those prepared to date for the LVIA. Martin Stickley (DBC) noted that it would be helpful to include a summary section / table in the Built 	<ul style="list-style-type: none"> CA have noted the requirement for an 'as built' ZTV and have asked (09/07/25) when this may be available from the Landscape team in order that it's interpretation can be added to the Built Heritage Assessment. Both SADC and DBC are content with the coverage of built heritage assets that have been taken into consideration for assessment. It is understood, however, that the final <u>as built ZTV</u>, may result in a measure of reassessment (final impact assessment) of some of these. This may also result in a requirement for the preparation of additional Viewpoints, beyond those prepared to date for the LVIA. The Built Heritage Assessment discusses the proposed and potential demolition and highlights benefits of the Development specifically where existing modern outbuildings are demolished.

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				Heritage Assessment to set out the benefits where identified of the Development specifically where existing modern outbuildings within the Site are demolished or refurbished.	
Historic England (HE)	Email Exchange CA with Historic England	25/09/2024 17/10/2024		<p>An introductory email was provided to Historic England's Inspector of Ancient Monuments (Essex and Herts) on 25/09/2024, which set out the suite of heritage assets CA intended to take forward for settings assessment in particular.</p> <p>Historic England's response was provided on 17/10/2024. This noted that:</p> <ul style="list-style-type: none"> • That HE were keen for a settings impact assessment that complies with the HE GPA guidance. • HE highlighted in particular the Scheduled Monument of Aubreys Camp; Gorhambury Registered Park and its Scheduled Monuments and Grade II* Westwick Cottage. • HE also noted that: the walkover survey includes visits to the above sites and also that visualisations are prepared as part of any planning application. • Also that measures to sustain or enhance settings of the assets as well as improving public 	<ul style="list-style-type: none"> • CA's Built Heritage Assessment adheres to HE GPA guidance and references throughout. • Each of these three designated heritage assets Aubreys Camp Scheduled Monument, Gorhambury RPG and Grade II* Westwick Cottage are assessed accordingly in the Built Heritage Assessment (Appendix 9.2) at paragraphs 5.62-5.72, 5.156-5.166, 5.110-5.125. • A visualisation for Aubreys Camp has been made by the Landscape team. None at this stage have been prepared for Gorhambury RPG or for Westwick Cottage. • Measures to sustain or enhance settings of heritage assets, as well as to improve public understanding and appreciation of them is being explored as part of the wider Development design and is considered in the ES, supported by Appendices 9.2 and 9.2. • As above.

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				<p>understanding and appreciation of them would be welcomed.</p> <ul style="list-style-type: none"> • And that opportunities to present and interpret undesignated archaeological heritage and other listed building assets within the site itself in a final scheme design as a part of place-making. 	
<p>Scoping Response (SADC & DBC)</p>	<p>Document submission</p>	<p>31/01/2025</p>	<p>5/24/2171</p>	<p>In respect of Built Heritage, the scope is considered to be broadly acceptable but is required to be modified to consider the historic settings of designated heritage assets unless robust justification for their exclusion is provided, having regard to the comments made by the Listed Buildings and Conservation Officer appended to this scoping opinion.</p> <p>The inclusion of a draft Zone of Theoretical Visibility is welcomed, but it is noted that this would be affected by building heights. At this stage there are no clear building parameters, and it is noted that these would be provided for the outline application (paragraph 5.1.4). The indicative heights would have maxima of 15, 18 and 25m as described in paragraphs 5.1.8-10 of the Scoping Report. These potential heights should be factored into the assessment of the impact to the setting of designated heritage assets.</p>	<ul style="list-style-type: none"> • A suite of designated and non-designated built heritage assets for assessment has been agreed with the Conservation Officers for both SADC and DAC (see above consultation references). Each has been assessed robustly as set out in Appendix 9.2. • An as built (worst case scenario) ZTV has been provided by the Design Team and has been assessed accordingly – as set out in Appendix 9.2. • Consultation with the Archaeological Advisor to SADC has been documented from the inception of the project (see above consultation references) and the assessment of archaeological potential within the Site discussed accordingly as set out in Appendix 9.1. • The assessment of the historic landscape has been separately considered and reported on in Appendix 9.1.

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				<p>In respect of archaeology, the scope is considered to be broadly acceptable, subject to the comments of the Council's archaeology advisor, Richard Havis, being fully taken into account, including addressing the separating out of the assessment of the historic landscape from the archaeology as this forms an important component of understanding how the archaeological deposits identified fit into the historic landscape. The historic landscape must be considered in the context of the assessment of likely effects in respect of archaeology. Please note that that comments from the County Archaeologist only apply to DBC.</p>	
<p>Historic England</p>	<p>Document submission</p>	<p>18/12/2024</p>	<p>5/24/2171</p>	<p><i>"The Aubreys camp scheduled monument (List no. 1003520) lies to the immediate north of the application site but has apparently been excluded from further assessment by the current applicants. I was not able to find a rationale for this choice in the Scoping Report application material. An understanding especially of the extent to which Aubreys camp overlooks and commands the open ground of the pre-application site to its south is a likely to be a key part of its significance, alongside understanding the relative importance of its location being also</i></p>	<p>The Scoping Response provided by Historic England reiterates its comments received by email on 25/09/2024 and 17/10/2024.</p> <ul style="list-style-type: none"> • Each of these three designated heritage assets Aubreys Camp Scheduled Monument, Gorhambury RPG and Grade II* Westwick Cottage are assessed accordingly in the Built Heritage assessment (Appendix 9.2) at paragraphs 5.62-5.72, 5.156-5.166, 5.110-5.125. • A visualisation for Aubreys Camp has been made by the Landscape team. None at this stage have been prepared for Gorhambury RPG or for Westwick Cottage. • Measures to sustain or enhance settings of heritage assets, as well as to improve public understanding and appreciation of them is being

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				<p><i>between the valleys of the Gade and the Ver.</i></p> <p><i>I recommend that the impact of the proposals on the setting of this designated asset is not excluded from the EIA process and that an informed assessment grounded in an understanding of the monument type and the local landscape is included in the Scoping material and any arising ES.</i></p> <p><i>The Aubreys lacks a detailed scheduling description, and so the applicants should consult HER-signposted information as well as draw on specialist understanding of the site type and the local topography to try to identify its significance and setting, especially in its role as a possible defensive work with a strong relationship to its surroundings from even afar.</i></p> <p><i>I am also concerned that the Gorhambury Registered Historic Park (List no. 1000417) as a receptor also appears to be explicitly scoped out of settings assessment (Avison Young 7.3.16), also without justification. The listed II* Westwick Cottage (List no. 1102898), being a mediaeval hall house, will have a close relationship with the surrounding farmland estate and detailed documentary and</i></p>	<p>explored as part of the wider Development design and is considered in the ES, supported by Appendices 9.2 and 9.2.</p>

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				<p><i>archaeological research may be helpful in better defining the manorial holding that served it and thus its immediate setting. The opportunity to examine the archaeological fieldwork with a view to better understanding the manor's setting and development would seem an obvious one but it is one that is missing from the application.</i></p> <p><i>Mitigation proposals around heritage (beyond archaeological fieldwork and possible preservation in situ) are not explored in the Avison Young report, perhaps due to a conclusion that no significant harm will be created. On current understanding, the effects of unavoidably destructive harm of development are not being addressed in a way that positively impacts the lives of future residents and visitors in the proposals. This is at best a missed opportunity and given the scale of the plans, what would be an undesirable outcome.</i></p> <p><i>I recommend that the applicants take a more imaginative approach and identify ways to sustain and enhance local heritage significance through improving the settings, public understanding and appreciation of important assets. This philosophy should form part of the landscaping, placemaking and, health and wellbeing and public benefit design</i></p>	

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				<p><i>process and should extend to improving access to, and understanding of, other nearby sites that may be affected such as Gorehambury Park and the Romano Celtic temple at Wood Lane End.</i></p> <p><i>I recommend that the applicants revise their Scoping proposals to address these four issues and would be pleased to comment on updated material."</i></p>	