

# B&Q Cricklewood ES Volume I

Chapter 9: Archaeology

Montreaux Cricklewood Developments Ltd

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## 9. Archaeology

### 9.1 Introduction

- 9.1.1 This chapter of the Environmental Statement (ES) reports the findings of an assessment of the likely significant effects on Archaeology as a result of the proposed 'B&Q Cricklewood' development (hereafter referred to as the 'Proposed Development') in the London Borough of Barnet (LBB) described in *Chapter 5: The Proposed Development*.
- 9.1.2 This chapter describes the archaeological assets in the vicinity of the Proposed Development Site (hereafter referred to as 'the Site'), including their heritage value, and assesses the potential impacts of the Proposed Development on those assets.
- 9.1.3 Baseline information is provided in the accompanying Technical Appendix (*ES Volume III: Appendix 9-1*).
- 9.1.4 The potential for effect interactions on a single receptor (Type 1 effects) are discussed in *Chapter 17: Effect Interactions*. Combined cumulative Archaeological effects (Type 2 effects) of the Proposed Development with other development schemes are discussed at the end of this chapter.
- 9.1.5 This assessment and ES chapter has been produced by AECOM Infrastructure and Environment.

### 9.2 Legislation and Planning Policy Context

- 9.2.1 This assessment has been undertaken considering relevant legislation and guidance set out in national, regional, and local planning policy. A detailed review of legislation and policy is set out in Section 2 of the archaeology desk-based assessment (DBA) (*ES Volume III: Appendix 9-1*), with a summary presented in the sections below. The legislation and policy requirements have informed the preparation of this ES chapter.

#### National Legislation

- 9.2.2 The Ancient Monuments and Archaeological Areas Act 1979<sup>1</sup> imposes a requirement for Scheduled Monument Consent for any works of demolition, repair, and alteration that might affect a designated Scheduled Monument or any other ancient monument which is considered of national importance and public interest in the opinion of the Secretary of State by reason of the historic, architectural, traditional, artistic or archaeological interest attached to it (Section 61 (12)).
- 9.2.3 For non-designated archaeological assets, protection is afforded through the development management process as established both by the Town and Country Planning Act 1990<sup>2</sup> and the National Planning Policy Framework<sup>3</sup> (NPPF) (see below).

#### National Planning Policy

##### National Planning Policy Framework (2019)

- 9.2.4 The NPPF sets out the Government's planning policies for England and how these should be applied to contribute to the achievement of sustainable development. While the EIA methodology forms part of a separate planning regime, the planning decision still takes account of national guidance. As such, it is important to understand where the development fits within this.
- 9.2.5 Section 16 of the NPPF deals specifically with the historic environment. Where changes are proposed, the NPPF sets out a clear framework to ensure that heritage assets are conserved, and where appropriate, enhanced in a manner that is consistent with their significance.
- 9.2.6 The NPPF sets out the importance of being able to assess the significance of heritage assets that may be affected by a development. Significance is defined in Annex 2 as being the, "*value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological,*

<sup>1</sup> Ancient Monuments and Archaeological Areas Act (1979) (as amended). 1979 c. 46.

<sup>2</sup> Town and County Planning Act (1990) (as amended). 1990 c8.

<sup>3</sup> Ministry of Housing, Communities and Local Government (MHCLG), 2019; National Planning Policy Framework (NPPF)

*architectural, artistic or historic*". Significance is not only derived from an asset's physical presence, but also from its setting. The setting of a heritage asset is defined in Annex 2 as, "*the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve*".

- 9.2.7 Paragraph 189 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Similarly, there is a requirement on local planning authorities, having assessed the particular significance of any heritage asset that may be affected by a proposal; to take this into account when considering the impact of a proposal on a heritage asset (paragraph 190).
- 9.2.8 In determining planning applications, local planning authorities should take account of the following points:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;
  - The desirability of new development making a positive contribution to local character and distinctiveness (paragraph 192); and
  - Opportunities to draw on the contribution made by the historic environment to the character of a place.
- 9.2.9 Paragraphs 193 to 196 of the NPPF introduce the concept that heritage assets can be harmed or lost through alteration, destruction or development within their setting. This harm ranges from less than substantial through to substantial. With regard to designated assets, paragraph 193 states that great weight should be placed on its conservation, irrespective of whether any potential harm is considered to be substantial or less than substantial. The paragraph goes further to say that the more important the asset, the greater the weight should be on its conservation. In paragraph 194, a distinction is made in respect of those assets of lower significance where substantial harm to or loss of significance should be exceptional, and assets of the highest significance (e.g. Scheduled Monuments, Grade I and Grade II\* listed buildings) where substantial harm to or loss should be wholly exceptional.
- 9.2.10 In instances where development would cause substantial harm to or total loss of significance of a designated asset consent should be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss (paragraph 195). In instances where development would cause less than substantial harm to the significance of a designated asset the harm should be weighed against the public benefits of the proposal to provide a balanced judgement (paragraph 196).
- 9.2.11 With regard to non-designated assets, paragraph 197 states that the effect of the application on the significance of the asset should be taken into account in determining the application. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

#### Planning Practice Guidance (PPG)<sup>4</sup>

- 9.2.12 The PPG provides further advice and expands on the guidance and policy outlined in the NPPF.
- 9.2.13 Significance of heritage assets and its importance in decision making is explored in Paragraph 009 of the PPG which states that heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.
- 9.2.14 The setting of the heritage asset is also of importance and a thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under

<sup>4</sup> MHCLG, 2019; NPPF Planning Practice Guidance (PPG) - Conserving and enhancing the historic environment

consideration and the degree to which the proposed changes enhance or detract from that significance and the ability to appreciate it. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which an asset is experienced in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.

- 9.2.15 Paragraph 013 of the PPG recognises that the contribution that setting makes to the significance of the heritage asset does not depend on there being public right or the ability to experience that setting. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change.
- 9.2.16 The PPG discusses how to assess if there is substantial harm. It states that what matters in assessing if a proposal causes substantial harm is the impact of the significance of the heritage asset. Ultimately, whether a proposal causes substantial harm will be a judgement for the decision taker. However, it acknowledges that substantial harm is a high test so may not arise in many cases. A key consideration when assessing whether there is an adverse impact on a listed building is whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed (Paragraph 017).

## Regional Planning Policy

### The London Plan – Spatial Development Strategy for Greater London (2016)<sup>5</sup>

- 9.2.17 Policies within the London Plan that specifically pertain to the historic environment include Policy 7.8 (Heritage Assets and Archaeology), Policy 7.9 (Heritage Led-Regeneration) and Policy 7.10 (World Heritage Sites).
- 9.2.18 Of greatest relevance is Policy 7.8 which establishes the contribution that designated and non-designated heritage assets make. The policy seeks to ensure the sensitive management and promotion of London's heritage assets and highlights the importance of identifying and recording London's heritage through character appraisals, conservation plans, local lists, and the Greater London Historic Environmental Record (GLHER).
- 9.2.19 Policy 7.8 Heritage Assets and Archaeology establishes the strategic aim that requires proposed developments to identify, record, interpret, protect, and where appropriate, present the site's archaeology. The policy secures this aim through planning decisions that require developments to conserve the significance of heritage assets. For archaeological resources, developments make provisions for the protection of the physical assets. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.
- 9.2.20 The Revised Early Minor Alterations (REMA) to the London Plan (2013) amended and split Paragraph 7.31 supporting Policy 7.8 Heritage Assets and Archaeology with regard to developments affecting the setting of heritage assets, the need to weigh developments causing less than substantial harm on heritage assets against the public benefit and the reuse or refurbishment of heritage assets to secure sustainable development.

### The London Plan – The Spatial Development Strategy for Greater London: Intend to Publish Version of the Plan to Secretary of State (December 2019)<sup>6</sup>

- 9.2.21 The draft London Plan will implement revised cultural heritage policies as stated in Policy HC1 Heritage conservation and growth, once adopted.
- 9.2.22 Sections A to C of the policy refer to the need for any proposed development to adequately assess the surrounding historic environment and effectively integrate London's heritage in regenerative change through place-making, design, and the delivery of public benefit secured and managed through the local planning system. The policy is thereby aimed at avoiding harm to the historic environment and, where possible, enhancing it by integrating heritage considerations early on in the design process.

<sup>5</sup> GLA, 2016; The London Plan – The Spatial Development Strategy for London Consolidated with Alterations Since 2011

<sup>6</sup> GLA, 2019; The London Plan – Spatial Development Strategy for Greater London – Intend to Publish Version of the Plan to Secretary of State . December 2019

9.2.23 Section D is specifically aimed at archaeological remains. It states that:

*“Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.”*

9.2.24 Overall, the draft London Plan is largely in line with the current London Plan, although it makes fewer direct comment on the approach LPAs should take to managing the historic environment. As such, any development found to be in accordance with the policies of the current London Plan will be aligned with the emerging London Plan policies.

## Local Planning Policy

### London Borough of Barnet Local Plan

9.2.25 The Barnet Local Plan sets out the local planning authority’s policy framework. It is composed of two central documents, the Core Strategy (Adopted 2012)<sup>7</sup> and the Development Management Policies<sup>8</sup>. Other relevant documents include the Sustainable Design and Construction Supplementary Planning Document<sup>9</sup> (Adopted 2016).

9.2.26 Although Core Strategy Policy 5 (CS5) is aimed at protecting and enhancing Barnet’s character to create high quality places, it is mainly concerned with preserving the built heritage landscape and makes no provision to preserve the archaeological resource.

9.2.27 Development Management Policy 06 (DM06), however, states that ‘*all heritage assets will be protected in line with their significance*’. Although it makes particular reference to areas known to contain significant archaeological remains, including the Cricklewood Archaeological Priority Area (APA) adjacent to the Site, it requires any development that may impact archaeological remains to adequately assess this impact and set out proposed mitigation to reduce that impact.

9.2.28 The Sustainable Design and Construction supplementary document further details the level of assessment required in support of planning application. Section 2.17 of the document states that any development that lies outside of the 19 Local Areas of Archaeological Significance, but which are larger in scale than 0.4 hectares, requires a desk-based assessment to determine whether any archaeological remains are present or likely to be present within the development and impacted by it. The Proposed Development falls within this category.

### London Borough of Barnet Draft Local Plan (Reg 18) Preferred Approach Consultation (2020)

9.2.29 The LBB are currently in the process of reviewing and updating the borough’s adopted Local Plan documents, and recently published its Draft Local Plan<sup>10</sup> (Regulation 18 document) for public consultation. The consultation period took place between 27 January – 16 March 2020, with the Regulation 19 (i.e. Publication of Local Plan for making representations on soundness issues (NPPF para 35) document scheduled for publication in Winter 2021. Adoption of the revised Draft/New Local Plan is not expected until Spring 2022.

9.2.30 The Draft Local Plan proposes to update its policies on the Historic Environment to be in line with those of the NPPF. Policy CDH08 Barnet’s Heritage states that, when determining a planning application, great weight should be given to the conservation of cultural heritage assets and that the level of harm to such assets should be balanced against the significance of the asset. It distinguishes between harm to assets of national significance and those of regional significance. The Draft Local Plan further states that proposed development situated in areas that have the potential to hold heritage assets with archaeological interest will need to be supported by an appropriate desk-based assessment and, where necessary, a field evaluation.

<sup>7</sup> London Borough of Barnet (LBB), 2012; Local Plan - Core Strategy

<sup>8</sup> LBB, 2012; Development Management Policies DPD

<sup>9</sup> LBB, 2016; Local Plan - Supplementary Planning Document: Sustainable Design and Construction

<sup>10</sup> LBB, 2020; Draft Local Plan for Public Consultation – Regulation 18 Document

- 9.2.31 By virtue of being at an early stage in the adoption process, the Draft Local Plan is considered to be of very limited weight and is not a material consideration within this EIA.

#### Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework<sup>11</sup>

- 9.2.32 Although the Proposed Development falls within the Cricklewood, Brent Cross and West Hendon Regeneration Area and is covered by its saved policies aimed at fulfilling the Development Framework for the area, none of the policies relate to the preservation of archaeological remains. The framework itself mentions archaeological remains only in the context of tall building developments. As such, all archaeological policies relating to this area are encapsulated by the Barnet Local Plan.

#### Brent Cross – Cricklewood Opportunity Area<sup>12</sup>

- 9.2.33 This framework is aimed at guiding development to the Brent Cross and Cricklewood Area. It makes little reference to heritage constraints, and only states a requirement for Heritage Statements to be submitted in support of planning applications for tall buildings exceeding 15 storeys.

### Other Relevant Policy, Standards and guidance

#### Historic England Guidance

- 9.2.34 Historic England has published a series of Good Practice Advice (GPA) of which those of most relevance to this appraisal are GPA2 - Managing Significance in Decision-taking<sup>13</sup> and GPA3 - The Setting of Heritage Assets<sup>14</sup>. Historic England has most recently published Advice Note 12 Statements of Heritage Significance: Analysing Significance in Heritage Assets<sup>15</sup> which is also relevant to assessing significance in line with the NPPF.
- 9.2.35 GPA2 emphasises the importance of having a knowledge and understanding of the significance of heritage assets likely to be affected by the development and that the “first step for all applicants is to understand the significance of any affected heritage asset and, if relevant the contribution of its setting to its significance” (paragraph 4). Early knowledge of this information is also useful to a local planning authority in pre-application engagement with an applicant and ultimately in decision making (paragraph 7).
- 9.2.36 GPA3 provides advice on the setting of heritage assets. Setting is as defined in the NPPF and comprises the surroundings in which a heritage asset is experienced. Elements of a setting can make positive or negative contributions to the significance of an asset and affect the ways in which it is experienced. Historic England state that setting does not have a boundary and what comprises an asset’s setting may change as the asset and its surrounding evolve. Setting can be extensive and particularly in urban areas or extensive landscapes can overlap with other assets. The contribution of setting to the significance of an asset is often expressed by reference to views and the GPA in paragraph 11 identifies those views such as those that were designed or those that were intended, that contribute to understanding the significance of assets.
- 9.2.37 Advice Note 12 outlines a recommended approach to assessing the significance of heritage assets in line with the requirements of NPPF. It includes a suggested reporting structure for a ‘Statement of Heritage Significance,’ as well as guidance on creating a statement that is proportionate to the asset’s significance (heritage value) and the potential degree of impact of a Proposed Development.

<sup>11</sup> LBB, 2005; Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework Supplementary Planning Guidance

<sup>12</sup> GLA, 2014; Brent Cross – Cricklewood Opportunity Area Framework

<sup>13</sup> Historic England (HE), 2015; Historic Environment Good Practice Advice in Planning Note 2. Managing Significance in Decision Taking in the Historic Environment

<sup>14</sup> HE, 2017; Historic Environment Good Practice Advice in Planning Note 3, 2<sup>nd</sup> edition. The Setting of Heritage Assets

<sup>15</sup> Historic England (HE) 2019; Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12.

## Chartered Institute for Archaeologists

- 9.2.38 The baseline study has been undertaken in accordance with guidance published by the Chartered Institute for Archaeologists (CIfA), with specific regard to the Standard and Guidance for Historic Environment Desk-based Assessment<sup>16</sup> and the Code of Conduct<sup>17</sup>.

## 9.3 Assessment Methodology

- 9.3.1 This section of this ES chapter presents the following:

- Information sources that have been consulted throughout the preparation of this chapter;
- Details of consultation undertaken with respect to archaeology;
- The methodology for the assessment of effects on archaeology, including the criteria for the determination of the heritage value of the resource and magnitude of change from the existing 'baseline' condition;
- An explanation as to how the identification and assessment of potential archaeological effects has been reached; and
- The significance criteria and terminology for the assessment of archaeological residual effects.

- 9.3.2 The following sources of information that define the Study Area for the Proposed Development have been reviewed and form the basis of the assessment of likely significant effects on Archaeology:

- Greater London Historic Environment Record (GLHER) (ref: 15300);
- National Heritage List for England (NHLE);
- Ordnance Survey historic mapping data;
- London Metropolitan Archives for further historic mapping and documentary sources and aerial photographs;
- London Borough of Barnet's Planning portal for relevant data; and,
- online sources, including the Archaeology Data Service (<https://archaeologydataservice.ac.uk/>), the British Geological Survey (BGS; <http://www.bgs.ac.uk/geoindex/>), open Lidar data obtained from the Environment Agency accessed through Lidar Finder (<https://www.lidarfinder.com/>), and Victoria County History and primary and secondary resources accessed via British History online (<https://www.british-history.ac.uk/>).
- Detailed plans<sup>18</sup><sup>19</sup>; and
- Geotechnical Investigation reports<sup>20</sup>.

- 9.3.3 Assets identified within the Site and Study Area have been given unique reference numbers pre-fixed with [A] and shown on Figure 9-1.

<sup>16</sup> CIfA, 2017; Standard and guidance for desk-based assessment. Chartered Institute for Archaeologists

<sup>17</sup> CIfA, 2019; Code of Conduct

<sup>18</sup> EPR Architects, 2020, Illustrative Scheme Plans, drawing numbers 10965-EPR-XX-GF-DR-A-TP-0201; 10965-EPR-XX-XX-DR-A-TP-0200; 10965-EPR-XX-XX-DR-A-TP-0203

<sup>19</sup> Exterior Architecture, 2020, General Arrangement Plans, drawing numbers ExA\_1939\_100; ExA\_1939\_101; ExA\_1939\_102; ExA\_1939\_150

<sup>20</sup> Capita, 2018, B&Q Cricklewood Geo-Environmental Investigation and Assessment. Document reference CS096070-JD-18-090-R



## Methodology for Determining Baseline Conditions and Sensitive Receptors

### Extent of Study Area

- 9.3.4 The study area for the collation of information on heritage assets was defined as 1km from the Site boundary. This distance has been judged as appropriate to provide the context of, and potential for, surviving archaeological remains on the Site given the historically agricultural and sub-urban context in which it is located.
- 9.3.5 Within this study area, detailed data was collated in relation to all designated and non-designated archaeological assets. All known heritage assets were identified using the data sources listed above.

### Site Visit

- 9.3.6 A site visit and visual appraisal of heritage assets within the study area were undertaken on 10 December 2019 to identify:
- Known archaeological assets within the Site;
  - Areas with the potential to contain any previously unidentified archaeological or historical remains; and
  - Location, extent and severity of modern ground disturbance and previous construction impacts.

## Methodology for Determining Demolition and Construction Effects

- 9.3.7 The construction phase includes enabling works, the demolition of existing buildings and structures within the Site, and the construction of the Proposed Development up to and including the finished development (as defined in *Chapter 5: The Proposed Development*).
- 9.3.8 Effects derived from pre-construction activities such as site clearance, enabling works, geotechnical investigations, remediation (if required), and utilities diversion have been considered in the Demolition and Construction phase. Demolition works will involve the removal of extant buildings and foundations across the whole of the Site. Construction activities will include piling and excavation activities. The latter of these may include earthworks relating to water management features such as ponds, attenuation tanks, and channels, in addition to the structures and landscaping associated with the Proposed Development itself. Lastly, the presence of the buildings within the landscape and possible effects derived from these will also be assessed as part of this phase.
- 9.3.9 Although some temporary impacts to the archaeological resource can be derived from temporary changes to their settings during construction, the majority of potential archaeological impacts derived from the construction phase would be permanent. This could include direct impacts to archaeological assets from ground disturbance within the Site as well as indirect impacts through changes to the setting of archaeological assets, including historic landscapes, within the Study Area.
- 9.3.10 The following method has been used to assess the likely significant effects of the Proposed Development upon archaeology:
- The heritage value of archaeological assets affected by the Proposed Development is first determined. This assessment draws on existing designations and professional judgment guided by policy, research agendas and the criteria set out in Table 9-1;
  - The impacts (magnitude of change) arising from the Proposed Development upon the heritage value of known or potential archaeological assets are then assessed using the criteria set out in Table 9-2. This takes into account any embedded mitigation (i.e. measures that offer mitigation but are inherent in the design and construction of the Proposed Development);
  - In response to the impacts identified and their subsequent effects, appropriate additional mitigation measures are then proposed. Archaeological mitigation may need to be implemented prior to the construction phase; and

- The final stage of the assessment establishes any residual effects that may remain following the implementation of the additional mitigation measures. The criteria used to identify and express the classification and significance of the residual effects are described in Table 9-3.

## Methodology for Determining Complete and Operational Effects

- 9.3.11 The physical presence of the structures and landscaping is assessed within the construction phase of the Proposed Development. Effects during operation are those effects associated with the Proposed Development once construction and commissioning has been completed and the Proposed Development is fully operational.
- 9.3.12 No impacts on archaeological remains are anticipated once the Proposed Development is Complete and Operational.
- 9.3.13 The methodology presented below has been updated since the Scoping Report was submitted to provide additional resolution and better represent the full gamut of possible archaeological assets, impacts, and to be in line with the terminology used by the wider ES.

## Value Criteria

- 9.3.14 The value of a heritage asset (its heritage significance) is guided by its designated status but is derived also from its heritage interest which may be archaeological, architectural, artistic or historic (NPPF Annex 2, Glossary; Historic England Guidance Note 12). Each identified heritage asset can be assigned a value (significance) in accordance with the criteria set out in Table 9-1. Using professional judgement and the results of consultation, heritage assets are also assessed on an individual basis and regional variations and individual qualities are taken into account where applicable.

**Table 9-1 Criteria for assessing the value of heritage assets**

Value (significance)	Asset categories
Very High	World Heritage Sites
	Scheduled Monuments
	Grade I and II* listed buildings
	Registered battlefields
	Grade I and II* registered parks and gardens
	Conservation areas of demonstrable high value
	Non-designated heritage assets (archaeological sites, historic buildings, monuments, parks, gardens or landscapes) that can be shown to have demonstrable national or international importance
High	Well preserved historic landscape character areas, exhibiting considerable coherence, time-depth or other critical factor(s)
	Grade II listed buildings
	Conservation areas
	Grade II registered parks and gardens
	Conservation areas
Medium	Non-designated heritage assets (archaeological sites, historic buildings, monuments, park, gardens or landscapes) that can be shown to have demonstrable regional importance
	Averagely preserved historic landscape character areas, exhibiting reasonable coherence, time-depth or other critical factor(s)
	Historic townscapes with historic integrity in that the assets that constitute their make-up are clearly legible
Medium	Locally listed buildings
	Non-designated heritage assets (archaeological sites, historic buildings, monuments, park, gardens or landscapes) that can be shown to have demonstrable local importance

Value (significance)	Asset categories
	Assets whose values are compromised by poor preservation or survival of contextual associations to justify inclusion into a higher grade Historic landscape character areas whose value is limited by poor preservation and/ or poor survival of contextual associations
Low	Assets identified on national or regional databases, but which have no archaeological, architectural, artistic or historic value Assets whose values are compromised by poor preservation or survival of contextual associations to justify inclusion into a higher grade Landscape with no or little significant historical merit

9.3.15 Having identified the value of the heritage asset, the next stage in the assessment is to identify the level and degree of impact to an asset arising from the Proposed Development. Impacts may arise during construction or operation and can be temporary or permanent. Impacts can occur to the physical fabric of the asset or affect its setting.

9.3.16 The level and degree of impact (impact rating) is assigned with reference to a four-point scale as set out in Table 9-2. In respect of cultural heritage an assessment of the level and degree of impact is made in consideration of any scheme design mitigation (embedded mitigation). If no impact on value is identified, no impact rating is given and no resulting effect reported.

**Table 9-2 Factors influencing the assessment of magnitude of impacts**

Impact rating	Description of impact
Very High	Changes such that the heritage value of the asset is totally altered or destroyed. Comprehensive change to elements of setting that would result in harm to the asset and our ability to understand and appreciate its heritage significance.
High	Change such that the heritage value of the asset is significantly altered or modified. Changes such that the setting of the asset is noticeably different, affecting significance and resulting in changes in our ability to understand and appreciate the heritage value of the asset.
Medium	Changes such that the heritage value of the asset is slightly affected. Changes to the setting that have a slight impact on significance resulting in changes in our ability to understand and appreciate the heritage value of the asset.
Low	Changes to the asset that hardly affect heritage value. Changes to the setting of an asset that have little effect on significance and no real change in our ability to understand and appreciate the heritage value of the asset

9.3.17 An assessment to classify the effect, having taken into consideration any embedded mitigation, is determined using the matrix in Table 9-3, which takes account of the value of the asset Table 9-1 and the magnitude of impact Table 9-2. Effects can be negligible, adverse, or beneficial.

**Table 9-3: Assessment of effect**

Magnitude of Impact	Heritage Value (Significance)			
	Very High	High	Medium	Low
Very High	Major	Major	Moderate	Minor
High	Major	Moderate	Minor	Negligible
Medium	Moderate	Minor	Negligible	Negligible

Magnitude of Impact	Heritage Value (Significance)			
	Very High	High	Medium	Low
Low	Minor	Negligible	Negligible	Negligible

- 9.3.18 The ES reports on the significance of effect in accordance with EIA methodology. Major and moderate effects are considered to be significant. Within the NPPF, impacts affecting the value of heritage assets are considered in terms of harm and there is a requirement to determine whether the level of harm amounts to 'substantial harm' or 'less than substantial harm'. There is no direct correlation between the significance of effect as reported in this ES and the level of harm caused to heritage significance. A major (significant) effect on a heritage asset would, however, more often be the basis by which to determine that the level of harm to the significance of the asset would be substantial. A moderate (significant) effect is unlikely to meet the test of substantial harm and would therefore more often be the basis by which to determine that the level of harm to the significance of the asset would be less than substantial. A minor or negligible (not significant) effect would still amount to a less than substantial harm. In all cases determining the level of harm to the significance of the asset arising from development impact is one of professional judgement.
- 9.3.19 An assessment of the predicted effect is made both prior to the implementation of mitigation and after the implementation of mitigation. The first highlights where specific mitigation may be appropriate. The second highlights where the mitigation has been effective in reducing effects to enable an overall residual effect of the scheme as a whole. It is important to stress that mitigation does not automatically reduce an effect but may be used to offset an adverse impact.

## Consultation

- 9.3.20 Consultation with the Greater London Archaeological Advisory Service (GLAAS), who provide planning advice to LBB, was carried out as part of the EIA Scoping Report issued by AECOM in December 2019. The scoping response from LBB in the EIA Scoping Opinion was received in February 2020 (HE ref: CLO30551) and the comments raised in the response are presented in Table 9-4 below.

**Table 9-4 Comments raised in the LBB EIA Scoping Opinion**

Comments Raised	Response Provided in the ES/Planning Application
Archaeology EIA Chapter should be supported by a Archaeological Desk Based Assessment	A desk-based assessment has been completed and is appended ( <i>ES Volume III: Appendix 9-1</i> )
The DBA and EIA Chapter should set out the significance of the site and the impact of the proposed development.	The significance of all archaeological assets are presented in the Archaeological DBA and in section 9.4 of this EIA Chapter. The impact assessment is presented in section 9.6 of this EIA Chapter.

- 9.3.21 Further Consultation was carried out directly with GLAAS to determine any archaeological evaluation or mitigation requirements in relation to the project. A response was received on 13/02/2020 (*ES Volume III: Appendix 9-2*) in which GLAAS confirmed that no further archaeological works would be necessary for the Proposed Development site.

## Limitations and Assumptions

- 9.3.22 The archaeological mitigation proposed below is based on the current understanding of the known archaeological resource at the time of writing. This is considered to be sufficient in assessing the potential for previously unrecorded archaeological assets to be present within the Proposed Development which is established in the Archaeological DBA (*ES Volume III: Appendix 9-1*). It is considered that sufficient desk-based information exists to adequately understand the potential impacts and mitigation, and it is therefore assumed that no archaeological works will be required pre-determination and that all archaeological matters, such as pre-construction archaeological evaluations and possible mitigation, are likely to be secured through an appropriately worded planning condition if deemed necessary by GLAAS and LBB.

- 9.3.23 It is assumed that the existing hardstanding will be removed and that the uppermost made ground deposits will be removed across the entirety of the Proposed Development. It is assumed that this will extend to a depth of approximately 0.4 m below ground surface based on professional experience and discussions with engineers familiar with the project. Excavation trenches for services and for piling beams are anticipated to reach between 1m and 2m below the current ground level.
- 9.3.24 Detailed pile design was not available at time of writing. However, an initial assessment by Meinhardt concluded that the four Development Parcels of the Proposed Development would require approximately 2,000 Continuous Flight Auger (CFA) piles that would extend 25m in depth and measure 750mm in diameter.

## 9.4 Baseline Conditions

- 9.4.1 This section provides a description of the current Proposed Development baseline and identifies the sensitive receptors and their heritage value. A full and detailed description of the baseline conditions within the Site and surrounding Study Area is provided in the Archaeological DBA (*ES Volume III: Appendix 9-1*), while below is a summary of the archaeological baseline presented in the DBA. Full details of the topography and geology are presented in the Ground Conditions and Contamination Chapter (*ES Volume I: Chapter 12*).

### Archaeological Assets

- 9.4.2 There are no scheduled monuments or non-designated archaeological assets within the Site. There are 23 non-designated archaeological assets in the Study Area, dating from the Roman period to the modern period, although the majority of these date to the post-medieval period onwards. There are three APAs defined by GLAAS (HE 2016) within the study area. These assets are presented in Figure 9-1.

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**LEGEND**

- Application Boundary
- 1km Buffer
- Archaeological Priority Areas (APA)

**Archaeological Asset (Period)**

- Roman
- Medieval
- Post-Medieval
- Modern

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Project Title  
**B&Q CRICKLEWOOD**

Drawing Title  
**ARCHAEOLOGICAL ASSETS**

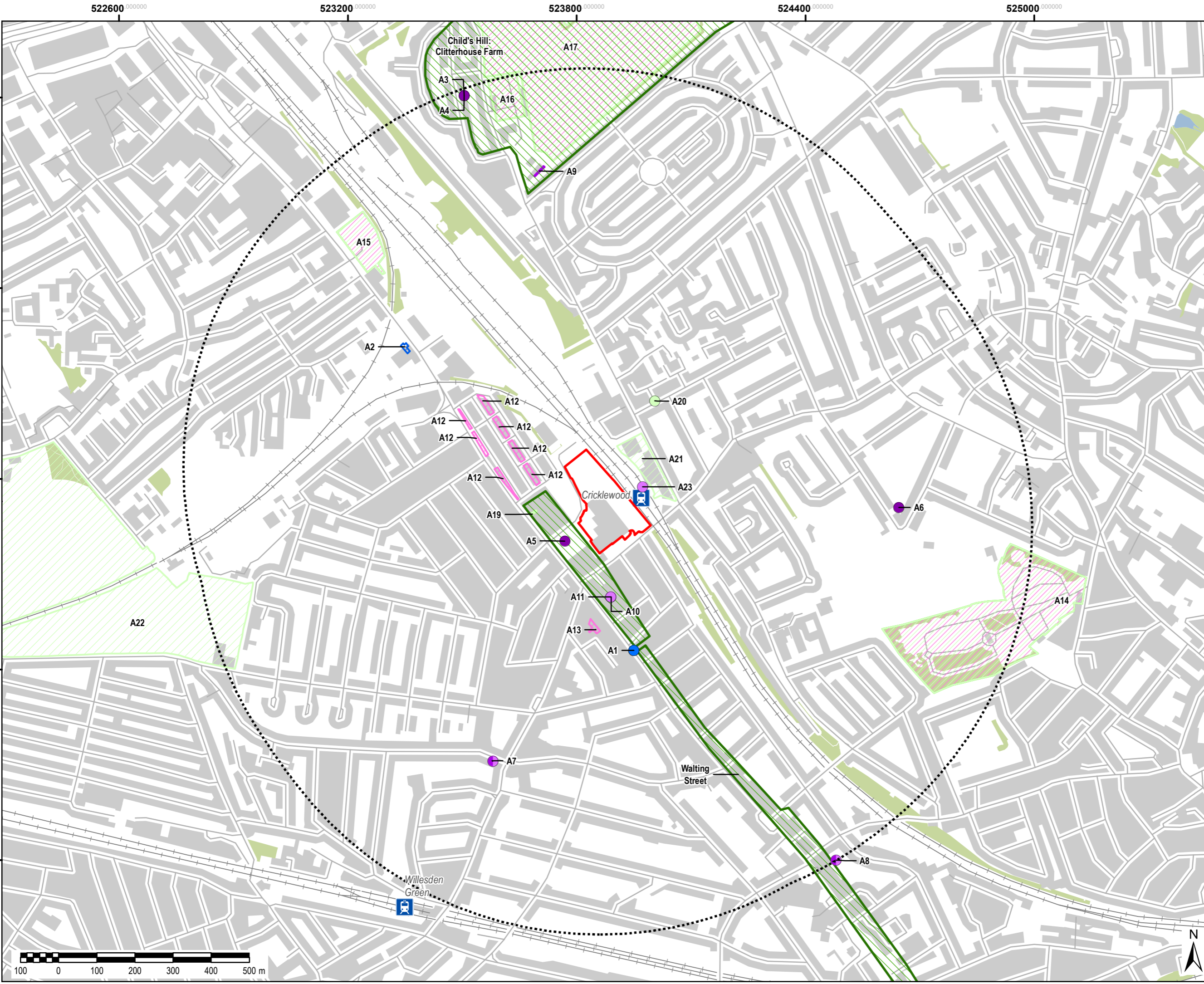
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**FIGURE 9-1**

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## Archaeological and Historical Overview

9.4.3 A description of the archaeological and historic context is presented below, by era.

### Prehistoric (c. 700,000 BC to AD 43)

9.4.4 No prehistoric remains have been recorded within the Study Area. The Site's location on poor soils overlying London Clay deposits several kilometres from the nearest river and major topographic features would have made this area relatively unattractive to prehistoric settlers.

9.4.5 The nearest and only significant remains of prehistoric date in the vicinity are extensive Mesolithic remains recorded at West Heath, Hampstead, 2km east of the Site, Bronze Age cremation burial along the River Brent 2km north of the Site, and a few scattered features and pottery sherds of Iron Age date recorded at Dollis Hill 1.4km north-west of the Site.

### Roman (AD 43 to 410)

9.4.6 The Site is located 100m east of the A5 Edgware Road, an existing road that follows the line of the Roman road from *Londinium* (London) to *Verulamium* (St Albans), the southern section of which is covered by the Watling Street APA of the London Borough of Camden. Roman roads typically indicate the possible presence of minor roadside settlements and other land uses such as cemeteries or quarry pits often found in association with them. However, at present, the available evidence does not suggest that this section of Watling Street was a major focus of activity.

9.4.7 The only known Roman feature aside from Watling Street within the Study Area is a Roman ditch and an undated post hole recorded 550m north-west of the Site.

9.4.8 A possible Roman building with associated evidence of quarrying, milling, and agriculture has been recorded at Dollis Hill 1.4km north-west of the Site. Evidence of possible Roman villas has been recorded at two locations 4km north of the Site.

9.4.9 These remains suggest that, during the Roman era, the Site was present within a rural agricultural landscape dominated by a few small dispersed farmsteads or villas in the vicinity of the Roman road of Watling Street.

### Early Medieval (410 to 1066)

9.4.10 There is no historical evidence to suggest that Cricklewood was settled during this period and it is not mentioned in the Domesday Book of 1086. Although, no early medieval archaeological remains have been recorded within the Study Area a number of settlements in the wider region are known to have Anglo Saxon origins.

### Medieval (1066 to 1540)

9.4.11 The Site is located in an area which, during the medieval period, would have formed the agricultural hinterland of London. Throughout this period, the nearby Watling Street continued to be used as a major thoroughfare linking London to more distant northern centres.

9.4.12 Numerous medieval nucleated settlements are known to have existed or originated during this period in the area surrounding the Site. The nearest of these is the small roadside settlement of Cricklewood mentioned in historical records starting in the 13<sup>th</sup> and 14<sup>th</sup> centuries and which is highlighted by the eponymous APA. Although the medieval settlement is presumed to have been situated near the modern junction of Edgware Road and Cricklewood Lane where the modern settlement exists today, little archaeological evidence of the early development of the hamlet has yet been recorded.

9.4.13 The medieval landscape surrounding the Study Area was dominated by small farmsteads in a patchwork of farmland and woodland. The nearest known such farm is that of a possible moated house recorded 700m east of the Site, later known as Cow House Farm in the post-medieval period. It has been suggested that this moated house may have once been the medieval manor of Cricklewood, which may explain the absence of medieval remains recorded within Cricklewood itself. The more distant and more extensive manor of Clitterhouse Farm, located approximately 900m north of the Site, is covered by the Child's Hill APA (3a).

### Post-Medieval (1540 to 1901)

- 9.4.14 Cartographic evidence suggests that little remained of the medieval settlement of Cricklewood by the mid-18<sup>th</sup> century, by which point it consisted of The Crown, a large coach house providing accommodation to travellers, and a few small buildings clustered to the south of the junction of Cricklewood Lane and Edgware Road.
- 9.4.15 Historic maps show that Cricklewood grew only modestly in the following century. They also show the Site in agricultural use. By 1840 a small cottage named Little Rock Hold had been erected just north-east of the intersection of Cricklewood Lane and Edgware Road, approximately 75m west of the Site. By 1848 this building was replaced by the larger Rockhalls Lodge, at which point the Site was largely centred on the Lodge's garden, but also covered a few outbuildings to the north-east of the garden. The Midland Railway line was constructed immediately east of the Site in 1868, and in the following decade the ground level was raised across the Site and the Child's Hill Sidings constructed over much of the Site.

### Modern (1901 to present)

- 9.4.16 The 20<sup>th</sup> century witnessed the accelerating expansion of Cricklewood along with other similar commuter towns throughout north London. By 1912 Cricklewood had been connected to London along Edgware Road and became a suburb.
- 9.4.17 The Child's Hill Sidings were expanded throughout much of the 20<sup>th</sup> century, with a dense array of sidings covering the entirety of the Site by the 1960s. These were removed in the 1970s, at which point only a few short sidings remained in the northern portion of the Site. Warehousing was also by this point erected along the eastern boundary of the Site.
- 9.4.18 By the 1990s the remaining railway sidings and the warehouses had been removed from the Site and a large superstore erected in the south-west of the Site. This was later purchased by B&Q and occupied by the B&Q, Poundstretcher, and tile store that are currently operating on the Site.

### Summary of receptors

- 9.4.19 The Archaeological DBA (*ES Volume III: Appendix 9-1*) has determined that the Proposed Development will not impact on any known designated or non-designated archaeological assets, whether directly or through changes to their settings.
- 9.4.20 The baseline has determined that the Site holds a high potential for previously unrecorded post-medieval and modern remains, a moderate potential for medieval remains, a low potential for all other periods. Previously unrecorded medieval remains, if present, would be considered of, at most, local archaeological and historical interest based on their ability to inform on medieval agricultural practices and field and property patterns. These would therefore be considered of **medium** heritage value as per the criteria set out in Table 9-1. Previously unrecorded post-medieval and modern remains would be considered of no historical or archaeological interest. If present, such remains would be considered of **low** heritage value as per the criteria set out in Table 9-1.
- 9.4.21 Based on a review of the baseline conditions set out in the archaeology DBA (*ES Volume III: Appendix 9-1*) and summarised above, Table 9-5 presents the receptors likely to be affected by the EIA Project, and their sensitivity. This takes into account the location of the receptor and its relationship with the Proposed Development.

**Table 9-5 Summary of archaeological assets and their heritage value**

Archaeological Asset	Heritage Value
Previously unrecorded medieval remains	<b>Medium</b>
Previously unrecorded post-medieval and modern remains	<b>Low</b>



## Future Baseline

- 9.4.22 This section considers changes to the baseline conditions, described above, which might occur during the time period over which the Proposed Development will be constructed, estimated to be completed in 2026.
- 9.4.23 Aside from impacts to the archaeological resource resulting from the construction of the Proposed Development, the future archaeological baseline will be largely dependent on the nature of local and regional archaeological discoveries and the level of urban development occurring in the intervening years. Although impossible to predict, new discoveries, or the lack thereof, may increase our understanding of the archaeological resource in the Study Area. These could alter future assessment of the potential for and nature of previously unrecorded remains. Developments in the Study Area also have the potential to alter the state of preservation of the archaeological resource in the Study Area through the removal, truncation, or sealing and preservation of archaeological assets. These changes are discussed in section 9.10.

## 9.5 Environmental Design and Management

- 9.5.1 Given the absence of known archaeological assets within the Site, there are no appropriate environmental design and management measures that can be applied to the management of the archaeological resources within the Proposed Development Site. Consequently, there is no appropriate inherent or embedded mitigation for the Proposed Development, only additional mitigation measures which will assess the presence, absence, and significance of previously unrecorded archaeological remains through the mitigation strategies proposed in section 9.7.

## 9.6 Assessment of Effects and Significance

### Effects during Demolition and Construction

- 9.6.1 The Demolition and Construction phase includes the construction of the Proposed Development up to and including the operational development (as defined in *Chapter 5: The Proposed Development*).
- 9.6.2 The Proposed Development has the potential to cause physical impacts on previously unrecorded buried archaeological resource within the Site with truncation or loss of the resource leading to permanent adverse impacts. Impacts from construction of the Proposed Development that will result in these effects may include:
- Piles, pile caps, ground beams and floor slabs;
  - Construction of a piling mat;
  - Ground remediation;
  - Excavation of utilities trenches, including underground grid connections.
  - Excavations for flood attenuation tanks or SuDS;
  - Earthworks associated with landscaping; and
  - Construction of lift pits.
- 9.6.3 Impacts to the lower deposits below the made ground with the potential to contain evidence for medieval agriculture will result from piling and any localised intrusive excavation extending below 2m bgl. No basements are planned and excavations for remediation, utilities, landscaping, flood defences, and lift pits are not anticipated to extend beyond 2m depth. The potential medieval remains would be considered of medium heritage value and would be subject to a medium magnitude of impact due to the asset being locally truncated by the piled foundations. The significance of effect on any such previously unrecorded remains would be **negligible** (not significant).
- 9.6.4 Ground remediation, construction of piling mat, construction of piles, ground beams and pile caps, and excavations for utilities trenches, flood defences, and landscaping, would result in the removal and/or truncation of post-medieval and modern deposits within the topmost 2m deposits considered of low heritage value. The removal of such assets would be considered to be a very high magnitude of impact.

However, given that these assets are considered of little to no archaeological or historical interest and of low heritage value (as per Table 9-1), this would result in a permanent **minor adverse** effect (not significant).

### Effects once Complete and Operational

- 9.6.5 All impacts on archaeological resources will occur during construction of the Proposed Development. Therefore, there will be no effects to buried archaeology from the Proposed Development when it is complete and operational.

## 9.7 Additional Mitigation and Monitoring Measures

### Mitigation during Demolition and Construction

- 9.7.1 Archaeological assessment is unlike most other EIA topics in so far as the presence of an asset is frequently not known with certainty. Unless records are extensive or archaeological investigation has been undertaken as part of the EIA, it remains the function of pre-construction investigation to ascertain whether any detailed mitigation measures may be required.
- 9.7.2 The Archaeology DBA has identified that there is a potential for archaeological remains to survive within the Site, although these are not expected to be sufficiently important to affect the proposed layout or design. Furthermore, given the limited heritage value of previously unrecorded archaeological remains that could be present within the Site and the **negligible to minor adverse** effect that would result from the construction of the Proposed Development, no mitigation measures are considered necessary in advance of or during the Demolition and Construction phase. This has been confirmed in consultation with GLAAS (*ES Volume III: Appendix 9-2*).

### Mitigation Once the Proposed Development is Operational

- 9.7.3 As the Proposed Development would not cause any further effects to the archaeological resource once complete and operational, no mitigation is considered necessary with regards to archaeology during that phase of development.

## 9.8 Residual Effects and Conclusions

- 9.8.1 The Demolition and Construction phase would result in a permanent **minor adverse** and a **negligible** residual effect on archaeological assets, neither of which would be considered significant or require mitigation. These effects are summarised in Table 9-6.

**Table 9-6: Archaeology Summary of Potential Effects**

Description of Effect	Value of Receptor	Nature of effect/Geographic Scale	Magnitude of Impact	Initial Classification of Effect (with embedded mitigation)	Additional Mitigation	Residual Effect and Significance
<b>Demolition and Construction</b>						
Effect of piling on previously unrecorded medieval remains	Medium	Permanent Local	Medium	Negligible	None required	<b>Negligible (Not Significant)</b>
Effect of intrusive works (including ground remediation, construction of piling mat, construction of piles, ground beams and pile caps, and excavations for utilities trenches, flood defences, and landscaping) on previously unrecorded post-medieval and modern remains	Low	Permanent Local	Very High	Minor Adverse	None required	<b>Minor Adverse (Not Significant)</b>

## 9.9 Statement of Effect Significance

- 9.9.1 The above assessment has identified that the Proposed Development could cause adverse effects to previously unrecorded archaeological resources that could be present within the Site. These would be limited to **minor adverse** and **negligible** adverse effects on previously unrecorded archaeological remains, neither of which would be considered significant.

## 9.10 Cumulative Effects Assessment

- 9.10.1 This section of the chapter assesses the potential effects of the EIA Project in combination with the potential effects of other development schemes (referred to as 'cumulative developments') within the surrounding area, as listed within Chapter 7: EIA Methodology of this ES.
- 9.10.2 The wider archaeological resource of the Study Area comprises remains which have accumulated as a result of human activity since the Roman period, agricultural and drainage activities since the 12<sup>th</sup> century, and industrial activities relating to the railway since the late 19<sup>th</sup> century.
- 9.10.3 It is reasonably assumed that the determination of planning approval for each cumulative development will have been made in accordance with national, regional and local planning policy and guidance, within which buried archaeological assets would be a material consideration and would have included the provision of appropriate archaeological mitigation measures, including the requirement for investigation and recording. The effects of the cumulative developments would therefore not form additional impacts to the buried archaeological resources within the Site for any phase of the Proposed Development.