

# CHAPTER 10

# ARCHAEOLOGY



U and I (8AE) Limited and the London Fire  
Commissioner (LFC)

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## **8 ALBERT EMBANKMENT**

Volume I: Chapter 10 - Archaeology





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# CONTENTS

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<b>10.</b>	<b>ARCHAEOLOGY</b>	<b>10-1</b>
10.1.	INTRODUCTION	10-1
10.2.	LEGISLATION, POLICY AND GUIDANCE	10-1
10.3.	RELEVANT ELEMENTS OF THE PROPOSED DEVELOPMENT	10-3
10.4.	ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA	10-4
10.5.	BASELINE CONDITIONS	10-11
10.6.	SENSITIVE RECEPTORS	10-17
10.7.	ASSESSMENT OF EFFECTS, MITIGATION AND RESIDUAL EFFECTS	10-17
10.8.	LIMITATIONS AND ASSUMPTIONS	10-20
10.9.	SUMMARY	10-20
10.10.	GLOSSARY	10-25
10.11.	REFERENCES	10-28



## 10. ARCHAEOLOGY

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### 10.1. INTRODUCTION

- 10.1.1. This Chapter reports the likely significant effects of the Proposed Development on the Site in terms of archaeology (buried heritage). The effect of construction works on known and unknown archaeological and cultural heritage resources is discussed. The Chapter also identifies proposed mitigation measures to prevent, minimise or control likely negative effects arising from the Proposed Development on archaeological remains, and the subsequent anticipated residual effects.
- 10.1.2. As heritage assets are an irreplaceable resource it is generally considered as standard practice within the planning system to implement mitigation measures in order to offset any level of adverse effect on a heritage asset, including minor negative. This is to ensure that finite and irreplaceable remains are not removed or lost without record.
- 10.1.3. This Chapter (and its supporting Historic Environment Assessment included in the appendices with associated figures) should be read together with the Introductory Chapters of this ES (**Chapters 1 – 5**), as well as **Chapter 15 Cumulative Effects**.

### 10.2. LEGISLATION, POLICY AND GUIDANCE

#### LEGISLATIVE FRAMEWORK

- 10.2.1. The applicable legislative framework is summarised as follows:

#### **ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979**

- 10.2.2. Nationally important archaeological sites (both above and below-ground remains) may be identified and protected under the Ancient Monuments and Archaeological Areas Act 1979. An application to the Secretary of State is required for any works affecting a Scheduled Monument. Prior written permission, known as Scheduled Monument Consent (SMC) is required from the Secretary of State for works physically affecting a scheduled monument. SMC is separate from the statutory planning process.
- 10.2.3. Development affecting the setting of a scheduled monument is dealt with wholly under the planning system and does not require SMC. Geophysical prospection (including the use of a metal detector) on a scheduled monument requires prior consent from Historic England.

#### **PLANNING (LISTED BUILDING AND CONSERVATION AREAS ACT) 1990.PLANNING POLICY**

- 10.2.4. The Planning (*Listed Buildings and Conservation Areas*) Act 1990 sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a conservation area are protected by law. Grade I are buildings of exceptional interest. Grade II\* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.
- 10.2.5. Planning policy at the national and local level and its relevance to environmental design and assessment is confirmed in **Chapter 1 Introduction** of the ES and in the Planning Statement which

accompanies the application and examines the merits of the Proposed Development against the relevant planning policy.

- 10.2.6. A summary of the Proposed Development compliance with legislation and planning policy with respect to archaeology is provided below.
- 10.2.7. **Appendix 10.1** includes a summary of the relevant policy concerning archaeology and buried heritage used for this assessment which has been from the following documents:

#### **NATIONAL PLANNING POLICY FRAMEWORK**

- 10.2.8. Section 16 of the current National Planning Policy Framework (NPPF: MHCLG 2019) “Conserving and enhancing the historic environment” (**Ref 10.1**) states that heritage assets are “an irreplaceable resource” which should be conserved “in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations” (paragraph 184). In determining planning applications, local planning authorities should require an applicant to “describe the significance of any heritage assets affected” at a level of detail proportionate to the assets’ importance and sufficient to understand the potential impact of the proposal on their significance. Where a site has potential to include heritage assets with archaeological interest, local planning authorities should require an appropriate desk-based assessment and, where necessary, a field evaluation (paragraph 189).
- 10.2.9. NPPF states that for non-designated heritage assets, the effect of proposals on asset significance should be taken into account in determining the application, requiring a balanced judgement regarding the scale of any harm or loss and the significance of the heritage (paragraph 197). Developers should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, with the results and any archive material made publicly accessible. The ability to make such a record should not, however, be a factor in deciding whether such loss should be permitted (paragraph 199).

#### **LOCAL PLAN OR LOCAL DEVELOPMENT FRAMEWORK**

- 10.2.10. The overarching strategies and policies for the whole of the Greater London area are contained within the London Plan (March 2016) (**Ref 10.2**). Policy ‘7.8 - Heritage Assets and Archaeology’ recognises the significance of London’s heritage assets and historic environment and states the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping. Development should ‘incorporate measures that identify, record, interpret, protect and, where appropriate, present the Site’s archaeology’ and notes that “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.” (Paragraph E)
- 10.2.11. Paragraph 7.31 supporting Policy 7.8 notes that “Substantial harm to or loss of a designated heritage asset should be exceptional.... Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal.”
- 10.2.12. Paragraph 7.32 of the London Plan recognises the value of London’s heritage, stating that: “...where new development uncovers an archaeological site or memorial, these should be preserved and managed on-site. Where this is not possible provision should be made for the investigation, understanding, dissemination and archiving of that asset”.

10.2.13. The current 2016 consolidation Plan is still the adopted Development Plan. However, consultation on revisions to the Plan was open until 2nd March 2018, and the Draft New London Plan, published online, is a material consideration in planning decisions. Policy HC1 “Heritage conservation and growth” of the Draft New London Plan is broadly in line with the existing Plan, but noting also that the cumulative impacts of incremental change from development on heritage assets and their settings should be actively managed. Development proposals should avoid harm to assets of archaeological significance or minimise it through design and appropriate mitigation. Where such an asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, by suitably-qualified individuals or organisations.

10.2.14. Relevant local planning policies that cover archaeology and heritage include:

- § Lambeth Local Plan (adopted September 2015) – Policy Q18 (Historic Environment Strategy) (**Ref. 10.3**);
- § Central Activities Zone Supplementary Planning Guidance (SPG) 2016 – Section 3: Enhancing the Distinct Environment and Heritage of the CAZ (**Ref. 10.4**); and
- § Vauxhall Supplementary Planning Document (SPD) 2013 – Principle 5: Reconnecting Vauxhall to the River, Improve the Riverside Walk and Enliven the Waterfront (**Ref. 10.5**).

#### **GUIDANCE**

10.2.15. Relevant guidance and best practice includes:

- § Planning Practice Guidance (2014) (**Ref. 10.6**);
- § ClfA (2014a) Standards and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment (**Ref. 10.7**);
- § ClfA (2014b) Standards and guidance for historic environment desk-based assessment (**Ref. 10.8**);
- § Historic England (2008) Conservation principles, policies and guidance (**Ref. 10.9**); and
- § Historic England (2015) The setting of heritage assets. Historic Environment Good Practice Advice in Planning Note 3 (**Ref. 10.10**).

### **10.3. RELEVANT ELEMENTS OF THE PROPOSED DEVELOPMENT**

10.3.1. The assessment adopts the approach outlined in **Chapter 2 Approach to the Assessment** and is based on the Application Plans as described in **Chapter 4 The Proposed Development**. The following components of the Proposed Development are relevant to the assessment of the likely significant effects in relation to archaeology associated with the proposed mixed use residential led development, since they indicate likely areas of ground disturbance with the potential to disturb archaeological remains:

- § Pilbrow & Partners, West Site - Proposed Basement and Mezzanine Plan (Figure 1528-PP-A0-B1-DR-A-10-0098);
- § Pilbrow & Partners, Central Site – Proposed Basement 2 Floor Plan (Figure 1528-PP-B0-B2-DR-A-10-0097);
- § Pilbrow & Partners, Proposed Lower Ground Floor Level (Figure 1528-PP-Z0-LG-DR-A-03-0099); and
- § Pilbrow & Partners, Central Site – Proposed Whitgift Street Resi elevation on the Central Garden (Figure 1528-PP-B0-XX-DR-A-11-2205).

## 10.4. ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA

### SCOPE OF THE ASSESSMENT

- 10.4.1. **Chapter 2 Approach to the Assessment** confirms the position on the EIA Scoping exercise, and the Scoping Report and subsequent EIA Scoping Opinion are available at **Appendix 2.1** and **2.2**. This section provides an overview on the scope of the assessment.
- 10.4.2. The Scoping Opinion received from LBL on 31st August 2018 included the following comments, set out in **Table 10-1**.

**Table 10-1 - Response to Scoping Opinion**

Scoping Opinion Comment	Response
With built heritage assets being considered elsewhere (Chapter 13 within the EIA Scoping Report), it is recommended that the scope be constrained to just buried archaeological remains.	This Chapter covers solely buried archaeological remains (see 10.4.6).
Palaeo-environmental remains (an assessment of) are omitted from the items discussed. This should be remedied with specific regard to the proximity of the river and gravel terrace.	A Geoarchaeological Deposit Model is appended to the Historic Environment Assessment, and Palaeo-environmental remains are discussed in para 5.2.7 in this Chapter.
Paragraph 8.4.1 of the EIA Scoping Report indicates that further archaeological investigation would likely be required prior to site preparation commencing, but post planning. This has been agreed with Historic England (Greater London Archaeological Advisory Service) – see Historic England’s (GLAAS) response in Appendix 3. Further to this, the details of the investigation strategy should also be agreed with Historic England (GLAAS) and LBL’s archaeological advisor and detailed within the ES.	Whilst general principles were previously agreed with GLAAS, (see <b>Table 10-2</b> ) no formal Written Scheme of Investigation (WSI) has been agreed for this scheme.

- 10.4.3. **Chapter 2 Approach to Assessment, Appendix 2.2 and Table 10-2 of this Chapter** provide further detail on individual consultee responses.
- 10.4.4. The historic environment as defined by NPPF comprises archaeological remains, structures, monuments or heritage landscape within or immediately around the Proposed Development Site that are considered to be significant because of their evidential, historic, aesthetic or communal interest.
- 10.4.5. This assessment deals solely with the archaeological implications of the Proposed Development and does not cover built heritage issues except where buried parts of historic fabric are likely to be affected. **Volume III Heritage, Townscape and Visual Impact Assessment (HTVIA)** covers the effect on above ground assets (designated and undesignated historic structures and conservation areas, and historic character, views and setting).
- 10.4.6. The Chapter contains a description of the heritage planning policy context and the methods used in the assessment. It describes the baseline historic environment currently existing at the Site and in its immediate vicinity; provides a statement of significance of known or possible buried heritage assets; assesses the magnitude of change (impact) of the Proposed Development upon the significance of



known or potential buried heritage assets and the resulting environmental effect; identifies the mitigation measures required to prevent, reduce or off-set any significant adverse environmental effects; and reports on residual effects (those that might remain after mitigation has been implemented).

- 10.4.7. An assessment of Operational Stage effects has been scoped out on the basis that once the Proposed Development has been completed, no further ground disturbance would occur and consequently there would be no additional impacts or resulting environmental effects upon buried heritage assets.

### LIKELY SIGNIFICANT EFFECTS

- 10.4.8. The following elements of the Proposed Development are those which without mitigation are considered to have an impact upon archaeological remains. They have been listed in the order of severity.

#### Demolition and Construction Stage

- § Excavation of new basement levels which would remove any archaeological remains within their footprint to their formation level; and
- § Insertion of new piled foundations which would remove any archaeological remains within their footprint.

#### Operational Stage

- 10.4.9. All impacts to archaeological remains would arise during the Demolition and Construction Stage of the Proposed Development. No further impacts to archaeological remains would arise during the Operational Stage of the Proposed Development, and therefore this will not be discussed further.

### CONSULTATION

- 10.4.10. Two consultation meetings were held with Mark Stevenson of the Greater London Archaeological Advisory Service (GLAAS).

**Table 10-2 - Consultation**

Body / Organisation	Individual / stat body/organisation	Meeting dates and other forms of consultation	Summary of outcome of discussions
GLAAS.	Mark Stevenson (GLAAS Advisor).	Meeting 24/01/17	Agreed geoarchaeological deposit model needed to explain the likely sequence of archaeological material on the Site and its survival.
GLAAS	Mark Stevenson (GLAAS Advisor).	Meeting 14/07/17	Examined the results of Geoarchaeology report and HEA and agreed that archaeological remains could be dealt with by a phased planning condition.

## EXTENT OF THE STUDY AREA

10.4.11. A study area of 200 m around the Site was used, and considered sufficient (using professional judgement), to place the Site into its archaeological and historical context, by collecting information on the known historic environment as held by the primary repositories of such information within Greater London. These comprise the Greater London Historic Environment Record (GLHER), the London Archaeological Archive and Research Centre and Historic England. The study area was considered through professional judgement to be appropriate to characterise the historic environment of the Site. Occasionally there may be reference to assets beyond this study area, where appropriate, e.g. where such assets are particularly significant and/or where they contribute to current understanding of the historic environment.

## METHOD OF BASELINE DATA COLLATION

10.4.12. Consultation of a broad range of relevant documentary and cartographic sources was undertaken, including published histories and journals, British Geological Survey data, available geotechnical data, and historic Ordnance Survey maps.

10.4.13. The methodology used to determine the significance of buried heritage assets (i.e. archaeological remains), the severity of any impacts upon them and the resulting significance of environmental effect is based on that typically used in EIA. Following the characterisation of the baseline conditions, the methodology used to characterise the potential effects on likely archaeological buried heritage assets at the Site included:

- § Evaluating the significance of buried heritage assets, based on existing designations and professional judgment where such resources have no formal designation, and considering evidential, historical, aesthetic and communal value as outlined in Historic England's Conservation Principles (**Ref. 10.11**);
- § Predicting the magnitude of change (impact) upon the known or potential heritage significance of buried assets and the likely resulting significance of environmental effect;
- § Considering the mitigation measures that have been included within the development proposals and any additional mitigation that might be required in the design and construction of the Proposed Development in order to mitigate likely significant adverse effects; and
- § Quantifying any residual effects (those that might remain after mitigation).

10.4.14. The assessment has been carried out in accordance with the requirements of the NPPF and to standards specified by the Chartered Institute for Archaeologists (**Ref. 10.12** and **Ref. 10.13**) and the Greater London Archaeological Advisory Service City of London (**Ref. 10.14**).

## DESK STUDY

10.4.15. An archaeological desk based assessment (Historic Environment Assessment – HEA) was carried out in December 2016 by MOLA (**Appendix 10.1**). As there has been no change within the site since that date it is considered that the observations made during that visit are still valid. The document complies with the relevant planning policies and best practice guidelines outlined above. The desk based assessment forms the baseline assessment of the Site's archaeological potential, and outlines the impacts to these remains in light of the Proposed Development. In summary, the methodology for the archaeological desk based assessment comprised:

- § A review of relevant policy considerations and legislative requirements;
- § A detailed review of information held by the GLHER, including known archaeological sites, built heritage features, and locations and results of previous archaeological investigations;
- § Examination of relevant publications, articles, historic maps (including tithe maps) and plans;
- § Examination of Historic England data relating to statutory designations including scheduled monuments and listed buildings, along with identified Heritage at Risk Register held at the National Monuments Record, Swindon;
- § Examination of available ground investigation reports and the engineering design to assess the impact on potential archaeology;
- § Examination of MOLA's in-house Geographical Information System (GIS) with statutory designations GIS data, the locations of all key indicators of known prehistoric and Roman activity across Greater London, past investigation locations, projected Roman roads and burial grounds from the Holmes burial ground survey of 1896; georeferenced published historic maps; Defence of Britain survey data, in-house archaeological deposit survival archive; and archaeological publications;
- § Examination of the proposed ground levels and the likelihood of survival of archaeological remains;
- § A site walkover to assess the visible archaeological; and
- § An evaluation of likely impacts based upon the potential for archaeological resources to be present at the Site.

#### **SITE VISIT / OTHER ASSESSMENT**

- 10.4.16. A site visit was carried out on 1<sup>st</sup> December 2016 in order to determine the topography of the Site and the nature of the existing buildings, and to provide further information on areas of possible past ground disturbance and general historic environment potential.
- 10.4.17. A watching brief was carried out on Site geotechnical investigation works (See **Chapter 12 Ground Conditions, Hydrogeology and Contamination** for further detail) on the West Site in May 2017 in order to confirm the depths of natural deposits and the presence and extent of the former dock wall and buildings relating to Stiff's London Pottery works. The site report forms **Appendix 10.2** of the ES.
- 10.4.18. Four trial pits were excavated by the ground works contractor. Test pit 1 uncovered a red brick floor 1.3m below ground level with a rubble fill containing ceramics. The location of this test pit in relation to the plans of Stiff's London Pottery works suggest that it is within one of the warehouses, possibly at a cellar or basement level. Test Pit 2 recorded stock bricks located under granite blocks immediately beneath ground level, these were tested with a keyhole and found to extend a further c 5.8m in depth. It is likely that this is the location of the dock wall. Further remains of the dock wall were uncovered in Test Pit 3; a horizontal core drilled at basement level recorded a c 1.0m thick stock brick wall, faced with asphalt behind the red brick skin basement wall. Test pit 4, a borehole drilled from basement level, recorded 0.75m thick reinforced concrete, overlying asphalt (interpreted as a damp course layer), beneath this was two courses of yellow stock brick, although the core was stopped at this depth (1.1m beneath the basement level) due to water pressure.

10.4.19. A geoarchaeological deposit model was produced in June 2017. Zones of archaeological potential were mapped and the likely nature and depth of archaeological deposits characterised across the Site. This report forms **Appendix 10.3** of the ES.

### **SIGNIFICANCE CRITERIA**

10.4.20. The assessment of potential effects as a result of the Proposed Development has taken into account both the Demolition and Construction Stage (the Operational Stage having been scoped out). The significance level attributed to each effect has been assessed based on the magnitude of change due to the Proposed Development and the sensitivity of the affected receptor/receiving environment to change, as well as a number of other factors that are outlined in more detail in **Chapter 2 Approach to the Assessment**. Magnitude of change and the sensitivity of the affected receptor/receiving environment are both assessed on a scale of high, medium, low and negligible (as shown in **Chapter 2 Approach to the Assessment**).

### **EVALUATING THE SIGNIFICANCE OF HERITAGE ASSETS**

10.4.21. 'Significance' lies in the value of a heritage asset to this and future generations. Known and potential heritage assets within the Site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against the following values, and has taken into account the likely nature, date, extent, survival, condition, rarity, and group value:

- § **Evidential Value:** the potential of the physical remains to yield evidence of past human activity. This might take into account date, rarity, state of preservation, diversity/complexity, contribution to published priorities, supporting documentation, collective value and comparative potential;
- § **Aesthetic Value:** this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written;
- § **Historical Value:** the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative; and
- § **Communal Value:** this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical, particularly associative, and aesthetic values, along with educational, social or economic values.

10.4.22. There is no single defining criterion that dictates the overall asset significance; each asset has to be evaluated against the range of criteria listed above on a case by case basis. Unless the nature and exact extent of buried archaeological remains within any given area has been determined through prior investigation, significance is often uncertain. **Table 10-3** gives examples of the significance of designated and non-designated heritage assets, based on statutory designation and/or professional judgement against the four values set out in the 2008 English Heritage (now Historic England) document *Conservation Principles*. This allows a consistent approach to be applied across both designated and non-designated heritage assets of different types.

**Table 10-3 - Significance of Heritage Assets**

Heritage Asset Description	Heritage Significance
World Heritage Sites; Scheduled monuments; Historic England Grade I and II* registered parks and gardens; Protected Wrecks; and Heritage assets of national importance.	Very High (International / National)
Historic England Grade II registered parks and gardens; Designated historic battlefields; Burial grounds; Protected heritage landscapes (e.g. ancient woodland or historic hedgerows); and Heritage assets of regional or county importance.	High (National / Regional / County)
Heritage assets with a district value or interest for education or cultural appreciation; and	Medium (District)
Heritage assets with a local (i.e. parish) value or interest for education or cultural appreciation.	Low (Local)
Historic environment resource with no significant value or interest.	Negligible
Heritage assets that have a clear potential, but for which current knowledge is insufficient to allow significance to be determined.	Uncertain

## MAGNITUDE OF CHANGE

10.4.23. Determination of magnitude of change upon the significance of known or potential heritage assets is based on the severity of the potential physical impact (e.g. any activity that would entail ground disturbance, from piling, ground reduction, etc). **Table 10-4** describes the criteria used in this assessment to determine the magnitude of change.

**Table 10-4 - Magnitude of Change**

Magnitude of Change	Description of Change
High	Complete removal of asset.  Change to asset significance resulting in a fundamental change in our ability to understand and appreciate the resource and its historical context, character and setting. The transformation of an asset's setting in a way that fundamentally compromises its ability to be understood or appreciated. The scale of change would be such that it could result in a designated asset being undesignated or having its level of designation lowered.

Medium	Change to asset significance resulting in an appreciable change in our ability to understand and appreciate the asset and its historical context, character and setting. Notable alterations to the setting of an asset that affect our appreciation of it and its significance; or the unrecorded loss of archaeological interest.
Low	Change to asset significance resulting in a small change in our ability to understand and appreciate the asset and its historical context, character and setting.
Negligible	Negligible change or no material change to asset significance. No real change in our ability to understand and appreciate the asset and its historical context, character and setting.
Uncertain	Level of survival/condition of resource in specific locations is not known: magnitude of change is therefore not known.

## SIGNIFICANCE OF ENVIRONMENTAL EFFECT

10.4.24. The environmental effect is determined by comparing the 'significance of baseline assets' with the 'magnitude of change', as outlined in **Table 10-5**. Effects may be either adverse (negative) or beneficial (positive) and are defined initially without mitigation. Where information is insufficient to be able to quantify either the resource significance or magnitude of change with any degree of certainty, the effect is given as 'uncertain'. 'Significant' effects are those that are moderate or major. Effects that are not 'significant' are minor or negligible effects.

**Table 10-5 - Significance of Environmental Effect (Prior to Mitigation)**

Magnitude of Change	Buried Heritage Asset Significance					
	Very High	High	Medium	Low	Very Low	Uncertain
High	Major	Major	Major or Moderate	Moderate or Minor	Minor	Uncertain
Medium	Major	Major or Moderate	Moderate	Minor	Negligible	Uncertain
Low	Moderate	Moderate or Minor	Minor	Minor	Negligible	Uncertain
Negligible	Minor	Minor or Negligible	Negligible	Negligible	Negligible	Uncertain
Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain

## MITIGATION MEASURES AND RESIDUAL EFFECTS

10.4.25. An appropriate mitigation strategy will reduce or offset any negative effect. Measures to mitigate effects would normally consist of design adjustments, to allow significant resources to be protected and retained (preservation in situ) or, where this is not feasible, investigation and recording before and during development, with dissemination at an appropriate level (preservation by record).

- 10.4.26. The level of mitigation proposed is, in each case, proportionate to the significance of the asset being affected.
- 10.4.27. The residual effect reflects the success rating for the recommended mitigation strategy. **Table 10-6** defines the significance of residual effects.

**Table 10-6 - Significance of Residual Effect**

<b>Significance of Effect</b>	<b>Description</b>
<b>Major Negative</b>	Substantial harm to, or loss of, significance of an asset of very high, high or medium heritage significance, as a result of changes to its physical form or setting.
<b>Moderate Negative</b>	Less than substantial harm to the significance of an asset of very high, high or medium heritage significance, as a result of changes to its physical form or setting.
<b>Minor Negative</b>	Limited harm to the significance of an asset of very high, high or medium heritage significance, as a result of changes to its physical form or setting, or substantial harm to, or the loss of, significance of an asset of low or very low heritage significance.
<b>Negligible</b>	No appreciable change to an asset's significance.
<b>Uncertain</b>	Significance of effect uncertain due to lack of information on buried heritage asset significance.
<b>Minor Positive</b>	Limited improvement of an asset's significance as a result of changes to its physical form or setting.
<b>Moderate Positive</b>	Notable enhancement of an asset's significance as a result of changes to its physical form or setting.
<b>Major Positive</b>	Substantial enhancement of an asset's significance as a result of changes to its physical form or setting.

## 10.5. BASELINE CONDITIONS

### EXISTING BASELINE

#### Designated Heritage Assets

- 10.5.1. There are no heritage assets designated under the *Ancient Monuments and Archaeological Areas Act 1979* within or adjacent to the site.
- 10.5.2. The West Site contains two Grade II listed buildings, the Former Headquarters Building and the Drill Tower, both built in the 1930s and officially opened in 1937. The late 19th century Grade II listed Southbank House, formerly the headquarters building for Doulton's Lambeth Pottery, lies just outside the site, adjacent to the southern boundary of the Central Site.
- 10.5.3. The majority of the Site (West and Central Site) is within the North Lambeth Archaeological Priority Area (APA), which includes prehistoric settlement, Roman settlement and a boat, medieval riverside zone village centres and important houses, post-medieval settlement and early industrial development (**Ref. 10.3**). Greater London Archaeology Advisory Service is currently re-assessing APAs throughout the London boroughs in line with new guidelines to link archaeological sensitivity

tiers to specific thresholds for triggering archaeological advice and assessment. Lambeth APAs have not yet been reviewed.

- 10.5.4. All three sites are within the Albert Embankment Conservation Area (CA57) as designated by the London Borough of Lambeth. This area is characterised by large office buildings, the majority of which date from the 20th century, fronting the River Thames along the Albert Embankment.
- 10.5.5. There are two locally listed buildings in close proximity to the Site: the former Queen's Head public house (71 Black Prince Road), built in 1890, is located 10m from the southern boundary of the East Site, on the opposite side of Black Prince Road, while the mid 19th century Windmill public house (44 Lambeth High Street) is adjacent to the north-east corner of the West Site. The historic graveyard on Lambeth High Street, 40m north of the Site, is a locally listed designated space and landscape (Basil Holmes 1896, 188) and contains a Grade II listed 18th century wall belonging to the former burial ground.
- 10.5.6. The three sites do not contain any further nationally designated (protected) heritage assets, such as scheduled monuments or registered parks and gardens.

### Site Topography and Geology

- 10.5.7. Topography can provide an indication of suitability for past human settlement, and ground levels can indicate whether the ground has been built up or truncated, which can have implications for archaeological survival. Geology can provide an indication of suitability for early settlement, and potential depth of remains.
- 10.5.8. The topography is relatively flat although there is a very gradual slope down from east to west towards the River Thames which lies 25m to the west of the western boundary of the West Site. It is likely the Thames frontage has been artificially raised to form the Albert Embankment. At the West Site the north-east corner lies at 4.2m Ordnance Datum (OD), the south-east corner at 4.0m OD, the south-west corner at 4.4m OD and the north-west corner at 4.6m OD. The Central Site is flat with all four corners lying at 4.2m OD. The East Site slopes up from the south-east corner (4.5m OD) to the north-west corner (4.8m OD), although this may be due to the demolition of earlier buildings.
- 10.5.9. The underlying geology of the Site comprises Kempton Park Gravels, although the western edge of the West Site may overlie alluvial deposits. Geological information for the Site, including information taken from geotechnical investigations on the Site, is summarised in the Technical **Appendix 10.3** but can be summarised as follows:

- § West Site: Untruncated gravels are likely to lay at c 2.0m OD (2.3m below ground level);
- § West site: A thin band of truncated alluvial deposits (average 07m thick) overlying the gravels at c 2.0m on the northern boundary towards the centre of the West Site;
- § Central Site: The level of natural gravels varies greatly across the site from 3.0m to 0.7m OD (1.2m to 3.5m below ground level), suggesting a degree of truncation to these deposits;
- § Central site: A thin band of truncated alluvial deposits (average 07m thick) overlying the gravels at c 2.0m in the very north-eastern tip of the Central Site;
- § East Site: No geotechnical data is available for this area, although it is likely that natural gravels would lay at c 3.0m OD (1.2m below ground level) here; and
- § Between the top of the natural and the current ground level are thick deposits of modern made ground and undated made ground. It is possible that in places, the natural Gravel is directly overlain by modern made ground, but elsewhere the lower deposits may potentially contain remains of archaeological interest.



## Past Archaeological Investigations

- 10.5.10. A watching brief was carried out on site geotechnical investigation works (See **Chapter 12 Ground Conditions, Hydrogeology and Contamination** for further detail) on the West Site in May 2017. The results of the watching brief are contained in **Appendix 10.2**. This comprised the monitoring of four test pits excavated by the Applicant's contractor. The results of these test pits confirmed the presence of the former Stiff's London Pottery warehouse in the north of the West Site, and uncovered possible evidence for the dock walls behind the existing redbrick basement walls.
- 10.5.11. A total of 14 further investigations have been carried out within the study area, comprising a mixture of evaluations, watching briefs and excavations. Eight of these investigations, to the south and east recorded evidence of pottery manufacture in the area dating from the 17th century through to the 20th century. Little archaeological evidence dating to earlier periods has been recorded during these past investigations, although prehistoric flint tools, a single sherd of Roman pottery, medieval pottery, field boundaries/ditches and cultivation soil have been recovered.

## Chronological Summary

- 10.5.12. A chronological summary for the Site can be read in full in the accompanying **Appendix 10.1**.
- 10.5.13. The Site's location on fast draining gravels close to the predictable resources of the River Thames would have made for an attractive location for early human settlement. Despite this, there is little prehistoric evidence within the study area. Evidence of a possible flint working site has been identified 100 m to the north of the Site, as evidenced by a collection of flint tools recorded during an excavation here. It is likely that the main settlement areas during this period were located closer to Waterloo Station, outside the study area to the north-east based on the presence of cut features comprising pits, post holes and beam slots found there during archaeological investigations. The Site likely was within open field adjacent to the River Thames in this period.
- 10.5.14. During the Roman period the main areas of settlement were located to the north-east of the Site centred on modern Southwark and the City. Remains of a road were uncovered in the 1930s in the grounds of Lambeth Palace, leading to the suggestion of a potential fording point in the vicinity of Lambeth Bridge. Further remains within this area include a post hole and a pit containing a single abraded sherd of Roman pottery. A single, residual sherd of Roman pottery has been recovered within the study area, 120 m north of the Site. It is likely that the Site was within an open field, adjacent to the River Thames in this period.
- 10.5.15. The name 'Lambeth' occurs in many forms in early records. It is of Saxon origin and signifies either a harbour or quay from which sheep were shipped, or a muddy harbour. Prior to the Conquest, the parish may have comprised three manors (estates); the Site would have likely been located within the manor of South Lambeth. A settlement known as Lambeth Water was located along the waterfront; the Site would have been within the environs of this, although no remains of the early medieval period have been identified in the study area.
- 10.5.16. In the later medieval period, the settlement of Lambeth grew slightly in prominence as the location of the Archbishop of Canterbury's residence in London. The Archbishop's palace is located 230m north of the Site, close to the location of the suspected Roman crossing, and it is likely that the main area of settlement was located here. The line of Lambeth High Street and Black Prince Road follow the alignments of medieval roads. It is possible that a degree of activity existed along these roads, although excavations to the south of the Site have recorded only medieval field boundaries and

cultivation soils, suggesting that Site was in open farmland, just outside the main settlement area in this period.

10.5.17. From possibly the late 16th century onwards, Lambeth became known as a centre of pottery manufactory. Certainly, from at least the 18th century the West Site became the location of the 'Lambeth Pot Shop', a manufacturer of tin-glazed pottery. Remains of dumps of wasters (damaged or poorly made pots), have been recovered in the vicinity of the Site. The Central Site was occupied by tenement buildings until the late 18th century when it was redeveloped into Stonard and Watson starch manufactory, which was in turn converted into a mustard factory in the early 19th century. In the mid-19th century the Central Site was occupied by Doulton's Pottery manufactory, one of the significant potshops in the area. Towards the end of the 19th century, the West Site was occupied by Stiff's Potshop, a competitor to Doulton, with a dock on the riverfront. The pottery shops were demolished in the early 20th century, and the London Fire Brigade opened on the Site.

10.5.18. The East Site lay within open field until the late-18th century when it was developed with terraced houses. These appear to have lasted until the later part of the 19th century when they were demolished. A subsequent phase of terraced houses is shown on late 19th century maps, continuing on the Site until the mid-20th century.

### **Factors Affecting Archaeological Survival**

#### ***West Site***

10.5.19. The survival of archaeological remains (especially those associated with the 18th century Lambeth Pot Shop, and the 19th century Stiff's London Pottery and associated dock) is thought to be low across the western basemented two thirds of the Site. Although it is expected to be high outside this area.

10.5.20. The existing single storey basement covers around two-thirds of the West Site; only the north-east corner of the Site is unbasemented. The top of the main basement floor level varies between c 3.0mbgl and c 3.6mbgl, while the floor level of the below ground (bunkered) CMC Building in the north-west corner of the Site, (originally the Stiff's Dock) is c 5.0mbgl. The recent MOLA watching brief on the Site (**Appendix 10.2**) noted a further 1.5m of basement slab and modern made ground. This would take the level of impact to between 4.5m and 5.1m below ground level (extending to 6.5m beneath the CMC Building). This will have entirely removed any remains from within its footprint.

10.5.21. It is possible that (parts of) the dock wall belonging to the 19th century Stiff's Dock in the north-west corner of the West Site may still survive between the existing CMC Building and the rest of the basement to the south and the site boundary to the north; the MOLA watching brief identified a 0.9m thick stock brick structure through a core drilled through the basement wall which may be the dock wall. The Drill Tower in the north-east corner of the site is likely to be built on concrete pad foundations which will have completely removed any archaeological remains from within the foundation footprints, causing localised truncation of 18th- and 19th-century buildings in this part of the Site.

#### ***Central Site***

10.5.22. The survival of archaeological remains (especially those associated with the 19th century Doulton Lambeth pottery and the Stonard and Watson starch manufactory) is thought to be high across the whole of the Central Site.



- 10.5.23. The existing building covers approximately two-thirds of the Central Site. The type of foundations used for this building is unknown, but in all likelihood they are likely to comprise concrete pad foundations. These will have removed any archaeological remains locally from within their footprint, although there is the potential for the survival of archaeological remains between the foundations and possibly beneath.
- 10.5.24. There is a small basement along the southern edge of the Site, occupying approximately 5% of the Central Site and extending to a depth varying between 0.1m OD and 1.2m OD (The Gordon Tomalin Partnership, Drwg No: 8901.01, August 2009. Assuming a c 0.5m thick basement slab, a formation level of –0.6 to 0.7m OD; 3.5–4.8mbgl) could be expected across this area. This will have removed any archaeological remains from within its footprint, although the bases of very deep cut features (e.g. pits, wells, kilns and deep foundations) may potentially survive below. Elsewhere, there are several vehicle inspection pits within the workshop, while below ground petrol or oil tanks probably lie within the eastern part of the Site. Both will have removed archaeological remains from within their footprint, to the depth of their excavation.

### ***East Site***

- 10.5.25. The survival of archaeological remains (especially for those associated with Doulton Lambeth Pottery) is expected to be high.
- 10.5.26. The East Site does not appear to have any basement levels associated with the former mid-20th century buildings here. The foundations for these buildings are not known, but given their date (1940s–1950s) they are likely to comprise strip or pad foundations. These will have removed any remains from within their footprints, although archaeological remains would survive between the foundations and possibly beneath them.

### **Statement of Significance**

#### ***Palaeoenvironmental Remains***

- 10.5.27. A patchwork of Holocene deposits (clays and peat) overlying the gravels survives in the north west of the site, partly within the West site and partly within the Central site, Probably representing Late Neolithic / Bronze Age or later (historic) estuarine inundation and backwater marsh development. The alluvium (clays) and organic fills (peats) may preserve palaeoenvironmental material enabling reconstruction of the past landscapes during the Holocene. Sediment survival and preservation likely to be best in this area although seemingly variable with the extent unknown (i.e. they could extend further to the west in the West site toward the river). Pollen and macro-botanical remains (of low heritage significance, based on potential evidential value) could record indirect or direct evidence of human activity on the floodplain. Waterside structures, such as piers and trackways may be preserved in channel marginal deposits.

#### ***Prehistoric***

- 10.5.28. The Site has low potential for in situ archaeological remains including palaeoenvironmental remains dating to the prehistoric period. Despite the location of the Site on a well draining gravel close to the predictable resource of the River Thames, little evidence of prehistoric activity or occupation has been recorded within the study area. In all likelihood the Site was open fields or woodland on the banks of the Thames. There is the possibility that residual prehistoric finds may be found, of low heritage significance, based on potential evidential value.

### ***Roman***

10.5.29. The Site has low potential for archaeological remains dating to the Roman period. As with the prehistoric period the location of the Site on gravels and close to the Thames would have been ideal for occupation, although no evidence of occupation or other activities have been recorded within the study area which probably remained open fields or woodland away from the main settlements.

### ***Early Medieval (Saxon)***

10.5.30. The Site has a low potential for archaeological remains dating to the Saxon period. During this period the Site probably was located in open fields outside the main settlement of Lambeth Water.

### ***Later Medieval***

10.5.31. The West and Central Sites have a moderate potential for archaeological remains dating to the medieval period, while the East Site has a low potential. The West and Central Sites were located on the edge of the settlement of Lambeth Water, which was starting to spread south along the Thames embankment during this period, although later truncation has probably removed any evidence of the settlement. A road ran through the Site from north to south, along the water front and may have attracted some settlement activity. The surrounding area was likely under cultivation at this time. Owing to the likely level of truncation, any surviving remains associated with this period, which may include structural evidence, road evidence and agricultural evidence, are likely to be of low heritage significance derived from the potential evidential value. The East Site probably was still outside the settlement during this period.

### ***Post-Medieval***

10.5.32. The West Site has high potential for archaeological remains dating to the post-medieval period. Whilst any remains within two-thirds of the Site will have been completely removed by the construction of the existing basement, outside the basement footprint there is potential for remains relating to the Lambeth High Street Pot House, dating to the early/mid-18th century, to be present. This was established on the former residence of the Bishop of Hereford and produced tin-glazed ('delftware') pottery. Remains of dumps of wasters would be of medium heritage significance, whereas structural remains of the manufactory, kilns, and evidence of industrial processes would be of high heritage significance. There is also the potential for similar remains associated with the subsequent, mid-19th century, Stiff's London Pottery building and kilns, again, of medium (wasters and waster dumps) or high (evidence of structures as well) heritage significance. Buried remains of the dock wall belonging to the 19th century Stiff's Dock in the north-west corner of the West Site would be of low or medium heritage significance. The significance of any such remains would be derived from evidential and historical values.

10.5.33. The Central Site has high potential for archaeological remains dating to the post-medieval period. This includes the remains of the early 19th century Doulton Lambeth Pottery manufactory, kilns and wasters, of medium or high heritage significance, depending on the nature and extent of the remains, and a late 18th century Starch/Mustard Manufactory, which would be of medium significance. There is also a high potential for other evidence tenement buildings, which would be of low heritage significance, based on evidential and historical value.

10.5.34. The East Site has high potential for post-medieval remains. The potential is for dumps of waster material from adjacent pot houses, and possibly pot house structures that are not shown on historic maps. The heritage significance of such remains would depend on their nature, date and extent but



might be medium or high, if present. By the end of the 19th century the site became tenement houses and rear yards, and footings of these buildings, along with associated yard surfaces and cess pits, would be of low heritage significance.

## 10.6. SENSITIVE RECEPTORS

10.6.1. **Table 10-7** summarises the sensitive receptors including their significance, which will be assessed in the following assessment:

**Table 10-7 - Summary of Potential Sensitive Receptors**

Receptor	Asset Significance
Early/mid-18th century Lambeth High Street Pot House (formerly the Bishop of Hereford residence) and associated remains in the West Site (High potential)	High
Early 19th century Doulton Lambeth Pottery Building in the Central Site and possibly the East Site (High potential)	High
Mid 19th century Stiff's London Pottery in the West Site and associated dock wall (High potential)	High (Medium for dock wall)
Mid 19th century terraced houses possibly in the East Site (High potential)	Low
Post-medieval waster dumps associated with the various pottery manufactories on the West, Central and East Sites (High potential)	Medium
Late 18th century Starch/Mustard manufactory in the Central Site (High potential)	Medium
Domestic evidence relating to the medieval and later settlement of Lambeth Water in the West and Central Sites (Moderate potential)	Low (owing to the level of truncation)

## 10.7. ASSESSMENT OF EFFECTS, MITIGATION AND RESIDUAL EFFECTS

### DEMOLITION AND CONSTRUCTION STAGE

#### Excavation of New Basement Levels

- 10.7.1. The Proposed Development includes the excavation of new basement levels across the Site as follows.
- 10.7.2. On the Central Site a two level basement across the whole building footprint with second basement floor level of c -4.8m OD, with a slab thickness of 1.0m, taking the total level of impact to -5.8m OD across c 80% of the Central site and a level of -5.8, with a slab thickness of 1.0m, taking level the

total level of impact to -6.8m OD (depending the depth of the pool) (Pillbrow & Partners, Central Site - Proposed Basement 2 Floor Plan, 1528-PP-B0-B2-DR-A-10-0097). The excavation to this level would constitute a High magnitude of change upon assets relating to the 19th century Doulton pottery manufactory (high heritage significance), possible waster dumps of the 18th and 19th century manufactories (medium heritage significance), remains of the later 19th century mustard/starch works (medium heritage significance) and likely truncated remains of later medieval activity in the area (low heritage significance).

- 10.7.3. The nature of the magnitude of change upon these assets considered to be of up to high heritage significance would be considered to be a **major negative** effect prior to mitigation. This effect would be direct, permanent and long term to these remains, and is therefore considered **significant**.
- 10.7.4. On the West Site, the eastern area of the existing basement would be deepened a further 2.0m and extended northwards by c 16% into the unbasemented area by a similar depth (-1.0m; Pillbrow & Partners, West Site – Proposed Basement and Mezzanine Plan, 1528-PP-A0-B1-DR-A-10-0098). Based on the current slab thickness, it is unlikely that any remains survive beneath the existing basement; there would be no further impact to archaeological remains here. The excavation to this level in the unbasemented area would constitute a high magnitude of change upon assets relating to the early/mid-18th century Lambeth High Street Pot House and the mid-19th century Stiff's London pottery manufactory (high heritage significance), possible waster dumps of the both these manufactories (medium heritage significance), and likely truncated remains of later medieval activity in the area (low heritage significance).
- 10.7.5. The nature of the magnitude of change upon these assets considered to be of up to high heritage significance would be considered to be a **major negative** effect prior to mitigation. This effect would be direct, permanent and long term to these remains, and is therefore considered **significant**.
- 10.7.6. The East Site would have a new lower ground level to an assumed standard depth of 3.0m below ground level (c +1.5m OD). This would extend into natural gravels and remove any remains that may be present. This could include remains of the mid-19th century Doulton Pottery manufactory (high heritage significance), waster dumps associated with 18th and 19th century pottery manufactory (medium heritage significance), and the footings of mid-19th century terraced houses (low heritage significance). The magnitude of change upon these assets would be considered to be high.
- 10.7.7. The nature of the magnitude of change upon these assets considered to be of up to high heritage significance would be considered to be a **major negative** effect prior to mitigation. This effect would be direct, permanent and long term to these remains, and is therefore considered **significant**.

### ***Mitigation***

- 10.7.8. It is considered that these impacts to archaeological remains which would be of up to a **major negative** effect can be successfully mitigated through a programme of preservation by record, secured under the terms of an archaeological condition attached to such appropriate planning consent as agreed with LBL in consultation with GLAAS. This would entail a phase of evaluation (including a geoarchaeological window sample or monolith evaluation) which could take place post-demolition and which would be used to inform the development of an appropriate mitigation strategy.
- 10.7.9. For well-preserved remains of up to high heritage significance, this would entail a full excavation within impact areas. For poorly preserved remains, or those of low significance this is likely to consist of a watching brief.



10.7.10. Prior to the start of each phase of archaeological work, its scope and methodology would be set out in a WSI to be approved by the LBL's archaeological advisor.

#### ***Residual Effect***

10.7.11. The magnitude of change to assets of up to high heritage significance is high and permanent in nature. The mitigation strategy outlined above, would entirely remove any archaeological remains that may be present in a controlled, documented manner, resulting in preservation by record. The magnitude of change upon these remains would remain high and permanent; however, as any archaeological remains would be recorded and preserved, the residual effect would be **negligible negative**, and is therefore considered **not significant**.

#### **Insertion of New Piled Foundations**

10.7.12. The new buildings would have piled foundations. It has been assumed for the purposes of assessment that any new piled foundations would be inserted after the excavation to the new basement levels. Within the areas of basement, this would have no additional effect.

10.7.13. In the north-east of the West Site, where there is no basement, the insertion of piled foundations would constitute an impact to archaeological remains that may be present in this area. Such remains are likely to include elements relating to the 19th century Doulton's Pottery manufactory (high heritage significance), the 18th century Lambeth Pot Shop (high heritage significance), and possible remains of late medieval activity (low heritage significance owing to likely truncation).

10.7.14. The insertion of piles would remove any archaeological remains within their footprints as the pile is driven downwards, although remains would survive between each pile in a truncated state. Additional impacts would arise from any pile caps or ground beams, which would entirely remove any archaeological remains within their footprints. It is assumed that the piled foundations would be moderately spaced, resulting in a medium magnitude of change.

10.7.15. Owing to the presence of remains of up to high heritage significance, this would result in a **moderate or major negative** effect prior to mitigation. This effect would be direct, permanent and long term to these remains, and is therefore considered **significant**.

#### ***Mitigation***

10.7.16. It is considered that these impacts to archaeological remains, which would be of up to a **major negative** effect, could be successfully mitigated through a programme of preservation by record. This would entail a phase of evaluation either prior to consent or as part of an archaeological condition which would be used to inform the decision of an appropriate mitigation strategy.

10.7.17. Depending upon the results of the evaluation, an appropriate mitigation would likely entail the excavation within the proposed pile locations and pile caps for well-preserved remains, or a watching brief on pile cap and ground beam locations for poorly preserved remains.

#### ***Residual Effect***

10.7.18. The magnitude of change to assets of up to high heritage significance is high and permanent in nature. The mitigation strategy outlined above, would entirely remove any archaeological remains that may be present in a controlled, documented manner, resulting in preservation by record. The magnitude of change upon these remains would remain high and permanent; however, as any archaeological remains would be recorded and preserved, the residual effect would be **negligible negative**, and is therefore considered **not significant**.

## **10.8. LIMITATIONS AND ASSUMPTIONS**

### **ASSUMPTIONS**

- 10.8.1. The assessment relies on available data, and best endeavours have been made to ensure that the data are accurate and up to date. It is assumed that information on the GLHER database is accurate. However, whilst compiling the baseline a process of review and validation of the GLHER data has taken place (for example ensuring assets are correctly located, and undertaking further research, where appropriate, into GLHER entries with little information).
- 10.8.2. At the time of writing no details as to the proposed foundations or layout was available for the Proposed Development. Assumptions as to the foundation type (piles) and the layout (moderately spaced) have been made.

### **LIMITATIONS**

- 10.8.3. The main limitation to the assessment is the nature of the archaeological resource - buried and not visible - which means it can be difficult to predict accurately the presence and likely significance of buried assets, and consequently the impact upon them, based primarily on desk based sources. The principle sources of information are the GLHER and the London Archaeological Archive and Research Centre, which list all known archaeological sites and finds. The information provides an initial indication of assets present rather than a definitive list of all potential archaeological assets because the full extent of a buried heritage resource cannot be known prior to site-specific archaeological field investigation. The results of the 2017 archaeological watching brief have been integrated into the assessment. This watching brief was limited in scope comprising the monitoring of four test pits on the West Site.
- 10.8.4. Notwithstanding these limitations, the methodology is robust, utilising reasonably available information, and conforms to the requirements of local and national guidance and planning policy. Typically, appropriate standard archaeological prospection and evaluation techniques are utilised to reduce the uncertainties inherent in any desk-based assessment, as part of an overall EIA mitigation strategy.

## **10.9. SUMMARY**

- 10.9.1. The assessment of the Proposed Development on archaeological remains has been compiled by MOLA in accordance with Section 12 of NPPF and best practice guidelines by Historic England and the Chartered Institute for Archaeologists. The West and Central Sites are within the North Lambeth APA while the entire site lies within the Albert Embankment Conservation Area (CA57) as designated by the London Borough of Lambeth. The East Site is not within either area.
- 10.9.2. The West Site contains two early 20th century Grade II listed buildings, the Former Headquarters Building and the Drill Tower, both built in the 1930s. The West Site does not contain any further nationally designated (protected) heritage assets, such as scheduled monuments or registered parks and gardens.
- 10.9.3. Archaeological survival is anticipated to be low across the basemented area of the West Site, and high across the Central and East Sites and the remainder of the West site as these are largely without basements. The greatest archaeological potential is in the West and Central Sites, primarily for the remains of 18th and 19th century pottery manufactories and associated waster dumps:



- § The Doulton and Watts, later Doulton and Company, Pottery established in the 1820s in the Central Site (high significance);
  - § Stiff's London Pottery established in the mid 19th century in the West Site (high significance); and the Lambeth High Street Pot House (formerly the Bishop of Hereford residence) established on the West Site in the early/mid 18th century (high heritage significance).
  - § There is also a high potential at the East Site for dumps of waster material from adjacent pot houses, and possibly pot house structures that are not shown on historic maps (medium heritage significance). The West Site also has high potential for the remains of the dock wall belonging to the 19th century Stiff's Dock, while the Central Site also has a high potential for the remains of the late 18th century Starch/Mustard manufactory (medium heritage significance). In the West and Central Sites there is a moderate potential for features (e.g. buildings, refuse pits etc) related to the late medieval settlement of Lambeth Water (low heritage significance owing to the likely truncation).
- 10.9.4. The excavation to deeper basement levels across the Central Site and within the unbasemented areas of the West Site would extend into natural deposits and entirely remove any surviving archaeological remains from within their footprint. This would constitute a high magnitude of change upon assets of up to high heritage significance resulting in a major negative effect prior to mitigation. The deepening of parts of the existing basement level in the West Site would have no further impact to archaeological remains, as these will have already been removed by the existing basement. The excavation of a new lower ground floor in the East Site would entirely remove any remains within its footprint and extend into natural gravels; this would constitute a high magnitude of change upon assets of up to high heritage significance, resulting in a **major negative** effect prior to mitigation.
- 10.9.5. It has been assumed for the purposes of this assessment that the new buildings would have piled foundations, to be inserted following the excavation of the basement levels. In the areas of basement, new foundations would have no further impact to archaeological remains. An area of the proposed building in the north of the West Site lies outside the area of the existing basement, and the insertion of new piles would constitute an impact to archaeological remains. It has been assumed that new piled foundations would be moderately spaced, and therefore a medium magnitude of change to archaeological remains of up to high heritage significance, resulting in a **moderate/major negative** effect prior to mitigation.
- 10.9.6. It is considered that these impacts to archaeological remains which would be of up to a **major negative** effect could be successfully mitigated through a programme of preservation by record. This would entail a phase of evaluation either prior to consent or as part of an archaeological condition which would be used to inform the decision of an appropriate mitigation strategy.
- 10.9.7. Such a strategy would entail the full excavation of the proposed basement areas for well-preserved remains of high heritage significance, or a watching brief for poorly preserved remains. Excavation of pile locations would ensure that no remains are removed in these areas without first understanding their nature and significance.
- 10.9.8. The magnitude of change to assets of up to high significance is high and permanent in nature. However, the mitigation strategy outlined would entirely remove any archaeological remains that may be present in a controlled, documented manner, resulting in preservation by record. The magnitude of change upon these remains would remain high and permanent; but, as the remains would be recorded and preserved, the residual effect would be reduced to **negligible**.

10.9.9. There is not considered to be any cumulative effects to archaeological remains arising from the Proposed Development and those considered for the cumulative scheme. Only two sites lie within a close proximity to the site which may have resulted in a cumulative effect, however, one of these schemes (Ref 11) does not entail any below ground excavation, and three archaeological investigations are noted in the site of the other (Ref 7), suggesting an appropriate mitigation strategy has already been carried out here. The remaining sites may share a potential for back ground remains (e.g. post-medieval development) but are not considered to elevate the effects of the Proposed Development.

10.9.10. A summary of effects and mitigation are provided in **Tables 10-8** and **10-9**.



**Table 10-8 - Summary of Effects for Archaeology**

DESCRIPTION OF SIGNIFICANT EFFECTS	RECEPTOR	SIGNIFICANCE OF EFFECTS					SUMMARY OF MITIGATION / ENHANCEMENT MEASURES	SIGNIFICANCE OF RESIDUAL EFFECTS					RELEVANT POLICY	RELEVANT LEGISLATION						
		Major / Moderate / Minor / Negligible	Positive / Negative	P / T	D / I	ST / MT / LT		Major / Moderate / Minor / Negligible	Positive / Negative	P / T	D / I	ST / MT / LT								
<b>Demolition and Construction</b>																				
Excavation of new basement levels	Remains of post-medieval pottery manufactories (up to high significance).	Major	Negative	P	D	LT	The implementation of an agreed programme of archaeological prospection followed where necessary by targeted archaeological excavation and/or a watching brief for remains of lesser significance, to achieve preservation by record	Negligible	N/A	P	D	LT	Section 12	NPPF (MHCLG 2018)						
	Remains of later medieval settlement (low significance)																		Policy 7.8 (Heritage Assets and Archaeology)	The London Plan (GLA, 2016)
																			Q18 (Historic Environment Strategy)	LBL 2015
Insertion of new piled foundations (outside the area of basements)	Remains of post-medieval pottery manufactories (up to high significance).	Moderate	Negative	P	D	LT	The implementation of an agreed programme of archaeological prospection followed where necessary by targeted archaeological excavation and/or a watching brief for remains of lesser significance, to achieve preservation by record	Negligible	N/A	P	D	LT	Section 12	NPPF (MHCLG 2018)						
	Remains of later medieval settlement (low significance)																		Policy 7.8 (Heritage Assets and Archaeology)	The London Plan (GLA, 2016)
																			Q18 (Historic Environment Strategy)	LBL 2015

Operational effects have been scoped out of the assessment

Key to table:

P / T = Permanent or Temporary, D / I = Direct or Indirect, ST / MT / LT = Short Term, Medium Term or Long Term

N/A = Not Applicable

**Table 10-9 - Summary of Suggested Mitigation**

Receptor	Asset Significance	Mitigation
Early/mid-18th century Lambeth High Street Pot House (formerly the Bishop of Hereford residence) and associated remains in the West Site (High potential)	High	<p>A programme of preservation by record under an archaeological planning condition, to be scoped by a WSI for each phase agreed with the LBL.</p> <p>The first phase to be evaluation test pits or trenches.</p> <p>Depending upon the results of the evaluation, an appropriate mitigation strategy to be drawn up and agreed with LBL in consultation with GLAAS is likely to entail archaeological excavation and recording within the proposed pile locations and pile caps for well-preserved remains, or a watching brief on pile cap and ground beam locations for poorly preserved remains or those otherwise of lesser significance.</p>
Early 19th century Doulton Lambeth Pottery Building in the Central Site and possibly the East Site (High potential)	High	
Mid 19th century Stiff's London Pottery in the West Site and associated dock wall (High potential)	High (Medium for dock wall)	
Post-medieval waster dumps associated with the various pottery manufactories on the West, Central and East Sites (High potential)	Medium	
Late 18th century Starch/Mustard manufactory in the Central Site (High potential)	Medium	
Mid 19th century terraced houses possibly in the East Site (High potential)	Low	
Domestic evidence relating to the medieval and later settlement of Lambeth Water in the West and Central Sites (Moderate potential)	Low (owing to the level of truncation)	

## 10.10. GLOSSARY

<i>Alluvium</i>	Sediment laid down by a river. Can range from sands and gravels deposited by fast flowing water and clays that settle out of suspension during overbank flooding. Other deposits found on a valley floor are usually included in the term alluvium (e.g. peat).
<i>Archaeological Priority Area/Zone</i>	Areas of archaeological priority, significance, potential or other title, often designated by the local authority.
<i>Brickearth</i>	A fine-grained silt believed to have accumulated by a mixture of processes (e.g. wind, slope and freeze-thaw) mostly since the Last Glacial Maximum around 17,000BP.
<i>B.P.</i>	Before Present, conventionally taken to be 1950
<i>Bronze Age</i>	2,000–600 BC
<i>Building recording</i>	Recording of historic buildings (by a competent archaeological organisation) is undertaken ‘to document buildings, or parts of buildings, which may be lost as a result of demolition, alteration or neglect’, amongst other reasons. Four levels of recording are defined by Royal Commission on the Historical Monuments of England (RCHME) and Historic England. Level 1 (basic visual record); Level 2 (descriptive record), Level 3 (analytical record), and Level 4 (comprehensive analytical record)
<i>Built heritage</i>	Upstanding structure of historic interest.
<i>Colluvium</i>	A natural deposit accumulated through the action of rainwash or gravity at the base of a slope.
<i>Conservation area</i>	An area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. Designation by the local authority often includes controls over the demolition of buildings; strengthened controls over minor development; and special provision for the protection of trees.
<i>Cropmarks</i>	Marks visible from the air in growing crops, caused by moisture variation due to subsurface features of possible archaeological origin (i.e. ditches or buried walls).
<i>Cut-and-cover [trench]</i>	Method of construction in which a trench is excavated down from existing ground level and which is subsequently covered over and/or backfilled.
<i>Cut feature</i>	Archaeological feature such as a pit, ditch or well, which has been cut into the then-existing ground surface.
<i>Devensian</i>	The most recent cold stage (glacial) of the Pleistocene. Spanning the period from c 70,000 years ago until the start of the Holocene (10,000 years ago). Climate fluctuated within the Devensian, as it did in other glacials and interglacials. It is associated with the demise of the Neanderthals and the expansion of modern humans.
<i>Early medieval</i>	AD 410–1066. Also referred to as the Saxon period.
<i>Evaluation (archaeological)</i>	A limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area.
<i>Excavation (archaeological)</i>	A programme of controlled, intrusive fieldwork with defined research objectives which examines, records and interprets archaeological remains, retrieves artefacts, ecofacts and other remains within a specified area. The records made and objects gathered are studied and the results published in detail appropriate to the project design.

<i>Findspot</i>	Chance find/antiquarian discovery of artefact. The artefact has no known context, is either residual or indicates an area of archaeological activity.
<i>Geotechnical</i>	Ground investigation, typically in the form of boreholes and/or trial/test pits, carried out for engineering purposes to determine the nature of the subsurface deposits.
<i>Head</i>	Weathered/soliflucted periglacial deposit (i.e. moved downslope through natural processes).
<i>Heritage asset</i>	A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets and assets identified by the local planning authority (including local listing).
<i>Historic environment assessment</i>	A written document whose purpose is to determine, as far as is reasonably possible from existing records, the nature of the historic environment resource/heritage assets within a specified area.
<i>Historic Environment Record (HER)</i>	Archaeological and built heritage database held and maintained by the County authority. Previously known as the Sites and Monuments Record
<i>Holocene</i>	The most recent epoch (part) of the Quaternary, covering the past 10,000 years during which time a warm interglacial climate has existed. Also referred to as the 'Postglacial' and (in Britain) as the 'Flandrian'.
<i>Iron Age</i>	600 BC–AD 43
<i>Later medieval</i>	AD 1066 – 1500
<i>Last Glacial Maximum</i>	Characterised by the expansion of the last ice sheet to affect the British Isles (around 18,000 years ago), which at its maximum extent covered over two-thirds of the present land area of the country.
<i>Locally listed building</i>	A structure of local architectural and/or historical interest. These are structures that are not included in the Secretary of State's Listing but are considered by the local authority to have architectural and/or historical merit
<i>Listed building</i>	A structure of architectural and/or historical interest. These are included on the Secretary of State's list, which affords statutory protection. These are subdivided into Grades I, II* and II (in descending importance).
<i>Made Ground</i>	Artificial deposit. An archaeologist would differentiate between modern made ground, containing identifiably modern inclusion such as concrete (but not brick or tile), and undated made ground, which may potentially contain deposits of archaeological interest.
<i>Mesolithic</i>	12,000 – 4,000 BC
<i>National Record for the Historic Environment (NRHE)</i>	National database of archaeological sites, finds and events as maintained by Historic England in Swindon. Generally not as comprehensive as the country HER.
<i>Neolithic</i>	4,000 – 2,000 BC
<i>Ordnance Datum (OD)</i>	A vertical datum used by Ordnance Survey as the basis for deriving altitudes on maps.
<i>Palaeo-environmental</i>	Related to past environments, i.e. during the prehistoric and later periods. Such remains can be of archaeological interest, and often consist of organic remains such as pollen and

plant macro fossils which can be used to reconstruct the past environment.

<i>Palaeolithic</i>	700,000–12,000 BC
<i>Palaeochannel</i>	A former/ancient watercourse
<i>Peat</i>	A build-up of organic material in waterlogged areas, producing marshes, fens, mires, blanket and raised bogs. Accumulation is due to inhibited decay in anaerobic conditions.
<i>Pleistocene</i>	Geological period pre-dating the Holocene.
<i>Post-medieval</i>	AD 1500–present
<i>Preservation by record</i>	Archaeological mitigation strategy where archaeological remains are fully excavated and recorded archaeologically and the results published. For remains of lesser significance, preservation by record might comprise an archaeological watching brief.
<i>Preservation in situ</i>	Archaeological mitigation strategy where nationally important (whether Scheduled or not) archaeological remains are preserved <i>in situ</i> for future generations, typically through modifications to design proposals to avoid damage or destruction of such remains.
<i>Registered Historic Parks and Gardens</i>	A site may lie within or contain a registered historic park or garden. The register of these in England is compiled and maintained by Historic England.
<i>Residual</i>	When used to describe archaeological artefacts, this means not <i>in situ</i> , i.e. Found outside the context in which it was originally deposited.
<i>Roman</i>	AD 43–410
<i>Scheduled Monument</i>	An ancient monument or archaeological deposits designated by the Secretary of State as a 'Scheduled Ancient Monument' and protected under the Ancient Monuments Act.
<i>Site</i>	The area of proposed development
<i>Site codes</i>	Unique identifying codes allocated to archaeological fieldwork sites, e.g. evaluation, excavation, or watching brief sites.
<i>Study area</i>	Defined area surrounding the proposed development in which archaeological data is collected and analysed in order to set the site into its archaeological and historical context.
<i>Solifluction, Soliflucted</i>	Creeping of soil down a slope during periods of freeze and thaw in periglacial environments. Such material can seal and protect earlier landsurfaces and archaeological deposits which might otherwise not survive later erosion.
<i>Stratigraphy</i>	A term used to define a sequence of visually distinct horizontal layers (strata), one above another, which form the material remains of past cultures.
<i>Truncate</i>	Partially or wholly remove. In archaeological terms remains may have been truncated by previous construction activity.
<i>Watching brief (archaeological)</i>	An archaeological watching brief is 'a formal programme of observation and investigation conducted during any operation carried out for non-archaeological reasons.'

## 10.11. REFERENCES

- Ref. 10.1 The London Plan (adopted March 2016) – Policy 7.8 (Heritage Assets and Archaeology), Draft New London Plan ([https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/GLA\\_draft\\_new\\_London\\_Plan\\_March\\_2018](https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/GLA_draft_new_London_Plan_March_2018)).
- Ref 10.2 Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework.
- Ref 10.3 Lambeth Local Plan (adopted September 2015) – Policy Q18 (Historic Environment Strategy).
- Ref. 10.4 Central Activities Zone Supplementary Planning Guidance (SPG) 2016 – Section 3: Enhancing the Distinct Environment and Heritage of the CAZ.
- Ref. 10.5 Vauxhall Supplementary Planning Document (SPD) 2013 – Principle 5: Reconnecting Vauxhall to the River, Improve the Riverside Walk and Enliven the Waterfront.
- Ref. 10.6 Planning Practice Guidance (2014).
- Ref. 10.7 ClfA (2014a) Standards and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment.
- Ref. 10.8 ClfA (2014b) Standards and guidance for historic environment desk-based assessment.
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- Ref. 10.11 EH [English Heritage], 2008, Conservation principles, policies and guidance. Swindon.
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- Ref. 10.13 ClfA [Chartered Institute for Archaeologists] Dec 2014b, Standards and guidance for historic environment desk-based assessment, Reading.
- Ref. 10.14 GLAAS [Greater London Archaeology Advisory Service], 2015 Guidelines for Archaeological Projects in Greater London.
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