



Historic England

Mr David Dorward  
Planning (South)  
City of Westminster Council

Our ref: CLO28212  
Your ref: 19/00114/FULL  
Telephone 0207- 9733215  
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19 February 2019

Dear Mr Dorward

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2018**

*Installation of the United Kingdom Holocaust Memorial and Learning Centre including excavation to provide a basement and basement mezzanine for the learning centre (Class D1); erection of a single storey entrance pavilion; re-provision of the Horseferry Playground and refreshments kiosk (Class A1); repositioning of the Spicer Memorial; new hard and soft landscaping and lighting around the site; and all ancillary and associated works.*

**Archaeology: Recommend Pre-Determination Archaeological Evaluation**

Thank you for your consultation dated 14/01/2019. The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter. Please note that Historic England's Development Management advice relating to designated heritage assets will follow shortly.

NPPF Section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF section 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest and that a field evaluation may also be necessary. NPPF section 194 (footnote 63) says that non-designated heritage assets of archaeological interest which are demonstrably of equivalent interest to scheduled monuments are subject to the policies for designated heritage assets.

I have looked at this application and the Greater London Historic Environment Record and am providing initial advice but will need further information from field evaluation before I can advise you on the effects on archaeological interest and their implications for the planning decision.



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## Archaeological and historical interest

Victoria Tower Gardens lies towards the southern end of the Palace of Westminster and Whitehall Archaeological Priority Area (APA); this is a non-statutory planning policy area indicating high archaeological sensitivity with demonstrable potential for remains equivalent to a scheduled monument. The Palace of Westminster and Westminster Abbey World Heritage Site and two Scheduled Monuments (the Jewel Tower and the Chapter House and Pyx Chamber in the Abbey Cloisters) are within the APA. It also includes the medieval town of Westminster and pre-medieval use of 'Thorney Island' eyot.

Victoria Tower Gardens was laid out in the early 1880s (later extended southwards). At surface level there may survive remains of Victorian/Edwardian paths, planting beds and other garden features, including temporary uses during the World Wars. The evolving use and layout of the garden and its association with Parliament has historical interest.

The Gardens were built astride the 16th to 19th century river frontage where river walls, wharves and associated commercial and industrial premises were located. Given the lack of 20th century disturbance this could be one of the best preserved sections of post-medieval riverfront in London with the potential for substantial buried remains of masonry and timber.

During the medieval period the site lay just to the south of the Abbey and Palace of Westminster along the river bank and foreshore at the mouth of the Tyburn River. The site occupied the river frontage of the Abbey's 'Sanctuary' (an area of protection from the law) which may reflect the greater precinct of the Anglo-Saxon Abbey. A substantial medieval stone-built river wall was found in Black Rod's garden and may extend south into Victoria Tower Gardens. The gardens are thought to cover the site of Westminster Abbey's Mill, St. Peter's Wharf and a Tudor slaughterhouse, as well as having high potential for new discoveries (e.g. sunken boats, wharves and jetties).

The site's potential for pre-medieval archaeology is harder to judge as river and sea levels fluctuated and it was probably wetland at some times and dryland at others. Nevertheless, it is known that the Thames provided a focus for settlement and religious practices including the construction of timber bridges and jetties and the ritual deposition of valuable objects and human remains.

Good survival of structures, artefacts and palaeo-environmental deposits is expected due to lack of twentieth century development and waterlogging adjacent to the river.

## The planning application and its environmental statement

Pre-application consultations have resulted in the proposed basement being located in the southern and central parts of the gardens where deep excavation poses a relatively somewhat lower archaeological risk than the northern part where the risk would have been very high. This is welcomed but nonetheless, as acknowledged by the applicant, archaeological survival within the application site is expected to be high.



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The applicant's Environmental Statement (ES) and accompanying desk-based archaeological assessment identify a risk of major adverse impact from the construction of the deep basement which can be mitigated to a negligible impact by archaeological investigation. It also identifies a major or moderate adverse impact from changes to the surrounding hydrology affecting the preservation of palaeo-environmental deposits which is mitigated to a minor adverse impact by the creation of a deposit model. I have concerns about this assessment both in terms of its conclusions and limitations in the information used to reach them.

Paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms but the ability to record is not a factor in deciding whether loss should be permitted. It is therefore not valid for the ES to conclude that mitigation in the form of archaeological investigation would reduce harm from moderate/major adverse to negligible.

The applicant's assessment lacks a geo-archaeological deposit model which was recommended in pre-application discussions and for which there is considerable published contextual information which is not referred to. The published studies should be supplemented by geo-archaeological boreholes within the site itself and the model updated. The geo-archaeological model should then be combined with geo-referenced historic map data to provide a phased interpretation of the site's development through time identifying the likely location of key heritage assets (e.g. mill slaughterhouse etc), land use (e.g. dryland/wetland) and topography (e.g. river channels). Field evaluation trenches/test pits can then be targeted on specific questions - a key issue being whether the site contains an undesignated heritage asset of equivalent significance to a scheduled monument that might be harmed either by construction works or by longer term changes to groundwater conditions. Particular concerns in this respect are whether timber structures of the medieval/post-medieval Abbey Mill or the Tudor slaughterhouse might be harmed or that the substantial medieval river wall found in Black Rod's garden might extend southwards into the site or that important new discoveries such as historic boats might be made. I identified similar issues in detailed comments on the desk-based assessment sent to the applicant's consultant before the application was submitted.

Our review of the submitted information indicates that harm to heritage assets of archaeological interest will arise mainly from three elements of the scheme:

- Removal of 1m of topsoil/subsoil to create a piling mat would remove or truncate shallow features most likely to be related to the gardens or preceding wharfs (the latter depending on the as yet unknown depth of modern overburden);
- Construction of the piled wall and excavation of the basement leading to total loss of all remains within the basement footprint (0.4 hectares);
- Changes to the groundwater conditions to a distance of c 250m beyond the basement possibly leading to medium-long term degradation of waterlogged deposits (including timber structures).

However, the degree of harm in each case is unclear due to lack of information on the depth and nature of deposits but on present evidence the second and third elements pose a clear



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risk of substantial harm to remains of national importance. Because of this, I advise the applicant completes the studies previously recommended to inform the application decision:

### **Geoarchaeology Coring and Deposit Model**

Geoarchaeology is the application of earth science principles and techniques to the understanding of the archaeological record. Coring involves boreholes drilled into the buried deposits to record (and sample) their characteristics, extent and depth. It can assist in identifying buried landforms and deposits of archaeological interest, usually by using the results in deposit models. Coring is often undertaken when the deposits of interest are too deep for conventional digging, or when large areas need to be mapped. It should form part of the archaeological evaluation to inform the planning decision.

There is demonstrable archaeological interest in the complex buried topography of the Tyburn, its confluence with the Thames and its relationship to prehistoric and medieval land use. It will be necessary to build from these existing interpretations in published sources and undertake further archaeologically-observed boreholes to model the sub-surface deposits across the site.

### **Field Evaluation**

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches and in this case areas of high potential that might be affected by groundwater changes should be tested as well as the proposed basement and pile mat footprints. The field evaluation report will be used to inform a planning decision.

I am concerned that the Environmental Statement and the Construction Management Plan appear to envisage archaeological evaluation being undertaken after planning consent has been granted and therefore to confuse the distinction between information needed to make an informed planning decision and any necessary mitigation that might follow.

### **Hydrological impact assessment**

The Environmental Statement identifies a potential risk to waterlogged remains out to a distance of about 250m from the site – this is a sufficiently extensive area to include the scheduled Jewel Tower, the likely sites of the Abbey Mill, the Tudor slaughterhouse, wharfs south of the Palace and the south-eastern corner of the World Heritage Site. Waterlogged timber structural remains are known to survive in this area so a Water Environment Assessment should be carried out following Historic England guidelines at tiers 2/3. This study will need to be informed by the deposit model requested above and may require evaluation test pits/trenches to establish the nature and vulnerability of buried remains in the northern part of the gardens.

### **Recommendations**

The proposals indicate a risk of harm or substantial harm to non-designated heritage assets of archaeological interest equivalent to a scheduled monument. I therefore recommend that you require further information to be submitted to properly understand and assess significant



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archaeological effects. I would need to agree the evaluation work beforehand and it should be carried out by an appropriately qualified and experienced archaeological practice, appointed by the applicant. Once this further information is supplied I will advise you again on determination of the planning application.

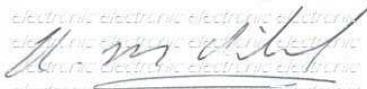
With respect to proposed mitigation I am also concerned that the investigation proposed in the Construction Management Plan does not seem consistent with the Environmental Statement and may not be adequate – once the further information has been supplied the applicant should obtain further advice from a practice with substantial experience of London waterfront archaeology and set out their proposed mitigation methodologies in more detail. We would support public engagement with investigations. We also recommend that the designated garden and monuments are recorded in their present form for their historical, architectural and artistic interest.

If you do not receive more archaeological information before you take a planning decision, I recommend that you cite the applicant's failure to submit sufficient archaeological information as a reason for refusal.

Please do not hesitate to contact me should you require further information.

This response relates solely to archaeological issues. Historic England's advice on built and landscape heritage will follow shortly.

Yours sincerely



The image shows a handwritten signature in black ink, which appears to be 'Sandy Kidd'. The signature is written over a background of faint, repeating text that reads 'electronic electronic electronic electronic'.

Sandy Kidd MA MCIFA MRTPI FSA  
Principal Archaeology Advisor (GLAAS)  
London and South East Region



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