



Historic England

Mr Ian Thynne
London Borough of Hillingdon

Our ref: CLO25095

Your ref: 73263/APP/2017/3838

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2 February 2018

Dear Mr Thynne

Schedule 17 Consultation under the High Speed 2 (London – West Midlands) Act 2017

COLNE VALLEY VIADUCT, WETLANDS ECOLOGICAL MITIGATION SITE HARVIL ROAD HAREFIELD

Further to my advice letter of 12th December I am writing to offer further advice now that the HS2/Fusion archaeologist Mr Iain Williamson has provided an update on their progress and proposals for this area (email received 29/1/18 with attachments). Mr Williamson says:

“The current situation is that we have reviewed the existing baseline archaeological resource as presented in the HS2 Phase 1 Environmental Statement, have identified a need for geophysical survey at this site and have already committed to confirming the veracity of the geophysical survey results through trial trench evaluation of the pond location (and wider Dews Farm area).

The geophysical survey of the Colne Valley Wetland site was planned for August 2017 as part of a wider programme of geophysics across the area surrounding Dews Farm. Due to various landownership and access issues, and despite several attempts to undertake the survey, we have to date not been able to complete the works. It is this delay to our survey programme which has resulted in the apparent lack of archaeological evidence to support the Schedule 17 submission. HE GLAAS have been consulted during the preparation of the project plans and LSWSIs for these works, although I understand you may not have received the final Code 1 documents via HS2’s SharePoint site.

Do rest assured that the geophysical survey, trial trench evaluation, critical review of the results and any recommendation to move the pond or implement archaeological mitigation works will



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be completed before construction of the habitat site begins in 2019. This is not optional; these works must be undertaken in advance of construction in accordance with the EMRs and GWSI:HERDS process.

Our approach and archaeological strategy being employed for the Colne Valley Wetland habitat mitigation site complies with the direction provided in the EMRs, particularly the Heritage Memorandum and guidance set out in the GWSI: HERDS for designing works and delivering archaeological evaluation, investigation/recording and post-excavation assessment.”

Specifically in connection with Schedule 17 applications Mr Williams goes on to suggest that:

“The EMRs and GWSI:HERDS provide the requirement to undertake appropriate archaeological evaluation and to reduce the impact of the scheme on heritage assets; either by the protection and preservation of heritage assets in situ, or, through appropriate investigation and recording designed in consultation with HS2’s stakeholders such as HE GLAAS.

Ultimately, at the Colne Valley Wetland site, if archaeological investigation identifies assets which should be preserved in-situ and which ‘clash’ with proposed pond location, the habitat site will need to be redesigned and, potentially, a new Schedule17 submission made.

As the GWSI:HERDS process has to be followed, archaeology should not lead to refusal of, or delay to the Schedule 17 submission. Nor should conditions be attached to the Schedule17 approval”.

GLAAS advice

I had previously been consulted by HS2 over their proposals for archaeological mitigation over wide areas both to the east and west of Harvill Road. Whilst these discussions have been welcome and generally constructive I have only just been sent the latest iteration of their project plans and will be providing further technical comment on them to HS2/Fusion shortly.

HS2/Fusion have now provided welcome reassurance (above) that they will be undertaking evaluation and could redesign the works if necessary. This is in line with the Environmental Minimum Requirements (EMR) Annex 3: Heritage Memorandum paras 4.6.2 and 4.6.3. However, procedurally I would have expected evaluation results to be available to inform the decision on where the ponds are located. From my perusal of the Schedule 17 Statutory Guidance and the EMR there does not appear to be an explicit connection between the archaeological process in the latter and the S17 procedure. However, the effect of a proposal on a site of archaeological interest is a consideration relevant to siting and design. As I have noted previously the absence of archaeological evaluation information at this time effectively precludes the local planning authority making an informed decision and exercising its right under Schedule 17 paragraph 9(5)(b) to refuse the scheme as submitted and require its modification to preserve a site of archaeological interest.

In this case we do not have specific information demonstrating that the siting of the pond should be modified nor could we suggest a specific alternative. However, it is agreed by all parties that there is a risk in this respect and that further archaeological information is



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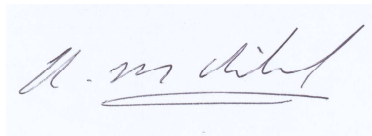


necessary. I note that the statutory guidance (section 8) says that the planning authority can approve some elements of the works and leave subsidiary issues for a subsequent decision.

In the circumstances I suggest the planning authority might either approve the application as submitted relying on the assurances received that modifications could take place later if necessary to comply with the EMR or that the planning authority approve other aspects of the scheme except the siting of the ponds for which additional details relating to archaeological preservation are still required. My preference would be for the latter approach. This situation should illustrate to HS2 why archaeological evaluation should be undertaken early in the design process.

Please do not hesitate to contact me should you require further information. This response relates solely to archaeological issues.

Yours sincerely



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