7 Archaeology

7.1 Introduction

7.1.1 This chapter of the ES has been produced by members of the Savills Heritage and Townscape team, which is a Registered Organisation with the Chartered Institute for Archaeologists (CIfA). The authors of this chapter are also individually accredited by CIfA.

7.1.2 This chapter of the ES presents findings of Environmental Impact Assessment (EIA) work undertaken, concerning potential effects of the Proposed Development on Archaeology. Professional expert opinion has been used to assess the heritage significance of the assets, taking into account past ground disturbance and any other factors which may have compromised the level of survival of those assets.

7.1.3 This chapter is supported by comprehensive and detailed baseline information contained within the Historic Environment Desk-Based Assessment (HEDBA) included as **Appendix 7.1**.

7.1.4 This ES Chapter:

- details the methodology followed, provides a review of the baseline conditions in the defined study area, and sets out the results of the assessment;
- presents the environmental baseline established from desk-based studies, surveys and consultation to date;
- assesses the potential effects and residual effects on archaeological remains;
- describes the designed-in or committed mitigation measures;
- presents the potential effects of climate change on heritage assets in relation to the Proposed Development, based on the information gathered and the analysis and assessments undertaken;
- identifies any assumptions and limitations encountered in compiling the environmental information; and,
- highlights any necessary monitoring and/or mitigation measures that could prevent, minimise, reduce or offset the possible environment effects identified in the EIA process.

7.2 Assessment methodology

Policy, Legislation and Technical Guidance

7.2.1 This assessment has been carried out with reference to the following national and local policies.

7.2.2 The **National Planning Policy Framework** (NPPF, August 2026), Section 20 contains 10 policies (HE1-HE10) relevant to the conservation and enhancement of the historic environment. It also notes that *"heritage assets are an irreplaceable resource and range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets*

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". (Section 20, pg.93).

7.2.3 The following policies are particularly relevant to the proposed development:

- **Policy HE1:** Planning for the historic environment requires development plans to support the conservation, enhancement and enjoyment of the historic environment. Plans should identify heritage assets within the plan area, be informed by a proportionate heritage assessment, consider the wider benefits of heritage conservation, and draw on the contribution that the historic environment can make to the character and quality of development.
- **Policy HE5:** Assessing effect on heritage assets notes that development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance.
- **Policy HE7:** Decisions on non-designated heritage assets states that development proposals that positively affect non-designated heritage assets should be supported. Harm to the significance of a non-designated heritage asset should be weighed against the benefits of the proposal, taking into account the scale of the harm or loss and the significance of the asset.
- **Policy HE10:** Loss or removal of heritage assets notes that heritage assets with archaeological interest should be preserved in situ where feasible. Where an asset cannot be preserved or managed on-site, appropriate provision should be made for the investigation, understanding, recording, dissemination and archiving of that asset, which should be undertaken by suitably qualified individuals or organisations.

7.2.4 In addition, the **London Plan: The Spatial Development Strategy for Greater London** (Greater London Authority, adopted March 2021), includes four policies relevant to the historic environment (HC1-HC4). The **Hillingdon Local Plan Part 1: Strategic Policies** (London Borough of Hillingdon, adopted November 2012) and the **Hillingdon Local Plan Part 2: Development Management Policies** (London Borough of Hillingdon, adopted January 2020) contain nine policies relevant to the historic environment (HE1, BE1, DMHB1-DMHB4 and DMHB7-DMHB9). The following policy is particularly relevant to the Proposed Development:

- **Policy DMHB 7**: Archaeological Priority Areas and Archaeological Priority Zones, states that sites of archaeological interest within or, where appropriate, outside, designated areas should not be disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate, and record remains in advance of development works.

7.2.5 The details of all policies relevant to the historic environment included in the NPPF, the London Plan: The Spatial Development Strategy for Greater London, and the Hillingdon Local Plan Part 1: Strategic Policies and Hillingdon Local Plan Part 2: Development Management Policies are reproduced in Appendix B of the Historic Environment Desk-Based Assessment, which is included as Appendix 7.1 to this assessment.

7.2.6 A range of standards and guidance exists for the assessment of the historic environment, primarily from the Chartered Institute for Archaeologists (CIfA) and Historic England. This assessment has been carried out with reference (but not limited) to the following key guidance:

- National Planning Practice Guidance on Historic Environment (MHCLG, 2019)
- Chartered Institute for Archaeologists (updated October 2025) *Code of conduct: professional ethics in archaeology*
- Chartered Institute for Archaeologists (updated October 2020) *Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment*
- Chartered Institute for Archaeologists (updated October 2020) *Standard and guidance for historic environment desk-based assessment*
- Historic England (2008) *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*
- Historic England (2015) *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in planning 2*
- Historic England (2019) *Statement of Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12*
- Historic England (2017, second edition) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3*
- Historic England (2020) *Enabling Development and Heritage Assets: Historic Environment Good Practice Advice in Planning Note 4*

7.2.7 'The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning: 3' (Second Edition, 2017, Historic England) provides guidance on managing change within the setting of heritage assets. It gives advice on understanding setting in relation to sensitivity to change and how views may contribute to setting. The advice note sets out a recommended approach, including:

- setting comprises the surrounding in which an asset is experience and may therefore be more than its curtilage; that it may be affected by a range of factors beyond visual, including historic relationships between assets; it may extend beyond public rights of way;
- the extent of setting is not fixed and may change as the asset and its surroundings evolve; heritage assets within extensive landscapes may have nested or overlapping settings;
- where the setting of a heritage asset has been compromised, consideration needs to be given to whether additional change will further detract from, or can enhance the importance of the asset;
- importance of setting in relation to designed landscape can extend beyond the designated area and may not necessarily be confirmed to land visible from the Site, but may have historic or other associations with the asset; and,

- the contribution of views to setting can be assessed in relation to static, dynamic, long, short, or laterally spreading views, and include a variety of views of, from, across, or including that asset.

Baseline study

7.2.8 A study area extending 750m from the Site boundary has been defined, within which known heritage assets have been examined to inform an assessment of the likely nature, extent, preservation and significance of any known and potential archaeological remains that may be present within or adjacent to the Site. The extent of the study area was determined in accordance with the Greater London Historic Environment Record Access and Charging Policy (Historic England, 2026).

7.2.9 The study area and assessment have been further informed by a site walkover visit undertaken on 5 August 2026. The purpose of the visit was to confirm the topography and existing land use, the nature of the existing buildings and monuments, identify any visible heritage assets (e.g. Structures, buildings and/or earthworks) and assess factors which may have affected the survival or condition of any known or potential assets. The site visit also extended into the study area beyond the Site boundary for the purposes of scoping heritage assets and assessing their intervisibility with the Site, as per Historic England guidance, and to inform the setting assessment included in this report. No new heritage assets were identified during the walkover, but observations made have informed the assessment of effects on the known designated and non-designated heritage assets within the wider study area.

7.2.10 In addition, an archaeological evaluation was undertaken within the northern part of the Site in 2001 in connection with a proposal for an International Business Training Centre (planning application reference no. 36762/APP/2001/2481).

Table 7.1 Summary of site-specific surveys

Title	Extent of survey	Overview of survey	Survey provider	Year	Reference to further information
Walkover Survey	The full Site	Potential archaeological features visible on surface, ground disturbance	Savills Uk	2026	Appendix 7.1

Predicting effects

7.2.11 Following the characterisation of the baseline environment, the methodology used to assess the likely effects of the Proposed Development on the historic environment includes an evaluation of the significance / importance of heritage assets within the Site and the wider study area. This is based on existing designations and professional judgement where such resources have no formal designation, and considering historical, archaeological, architectural and artistic interest as outlined in the NPPF and Historic England's guidance.

7.2.12 The NPPF Glossary (Annex B) defines significance as *"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within*

each site's Statement of Outstanding Universal Value forms part of its significance". The determination of the significance of a heritage asset is based on statutory designation and/or professional judgement against these values.

7.2.13 Historic England (2019) defines archaeological interest as the potential of a heritage asset to hold evidence of past human activity worthy of expert investigation. Archaeological interest may be derived from above-ground structures and landscapes, earthworks and buried or submerged remains, palaeoenvironmental deposits. In assessing archaeological interest, consideration should be given to factors such as date, rarity, state of preservation, diversity / complexity, contribution to published priorities (research value), supporting documentation, collective value and comparative potential, and sensitivity to change.

7.2.14 Historical interest is defined as an interest in past lives and events (including Prehistoric). It tends to be illustrative or associative. Heritage assets with historic interest not only provide a material record of the nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

7.2.15 Architectural and artistic interest are defined as interests in the design and general aesthetics of a place, deriving either from conscious design or through the evolution of a place over time. Such interest can more specifically relate to the science of design, construction, craftsmanship and decoration. Artistic interest is an interest in other human skill, such as sculpture.

7.2.16 The criteria used to determine the sensitivity of heritage asset receptors are presented in Table 7.2 below.

Table 7.2 Value/sensitivity assessment

Receptor value / sensitivity	Receptor type
High	• Scheduled Monuments • Registered Battlefields • Non-designated sites and monuments of schedulable quality and/or importance discovered through the course of assessment, evaluation, or mitigation. • Designated and undesignated historic landscapes of outstanding interest, or high quality and importance and of demonstrable national value. • Well-preserved historic landscapes, exhibiting considerable coherence, time-depth or other critical factors.
Medium	• Historic townscapes and landscapes with reasonable coherence, time-depth and other critical factors. • Designated special historic landscapes. • Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value. • Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factors.

Receptor value / sensitivity	Receptor type
	• Archaeological features and deposits of regional importance.
Low	• Sites of Importance within a district level. • Heritage Assets with importance to local interest groups or that contribute to local research objectives. • Robust undesignated assets compromised by poor preservation and/or poor contextual associations. • Robust undesignated historic landscapes. • Historic landscapes with importance to local interest groups. • Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations. • Archaeological features and deposits of local importance.
Negligible	• Assets with little or no archaeological, architecture / artistic, or historical interest.

7.2.17 The magnitude of impact, based on the change that the Proposed Development would have on a resource/receptor, is assessed as high, medium, low, or negligible. The criteria used to determine the magnitude of impact are set out in Table 7.3.

7.2.18 In the context of EIA, known or potential archaeological remains (either above or below ground) are the receptor of change and the term 'significance' is interchangeable with the terms 'importance' and the 'sensitivity to change' of the receptor. The ES Chapter will utilise the term 'importance' in relation to the significance of the archaeological remains (receptor) in question, which 'significance' will be associated with the 'significance of the environmental effect' evaluating the contribution of setting.

Table 7.3 Magnitude of impact

Magnitude	Description
High	• Complete removal of the asset. • Impact such that the significance of the asset is totally altered or destroyed. • Comprehensive impact to, or total loss of, elements of setting that would result in harm to the asset and our ability to understand and appreciate its significance. • The scale of impact would be such that it could result in a designated asset being undesignated or having its level of designation lowered.
Medium	• Impacts such that the significance of the asset is significantly altered or modified.

Magnitude	Description
	• Impacts such that the setting of the asset is noticeably different, affecting significance and resulting in changes in our ability to understand and appreciate the significance of the asset.
Low	• Impacts such that the significance of the asset is slightly affected. • Impacts to the setting that have a slight impact on significance resulting in changes in our ability to understand and appreciate the significance of the asset.
Negligible	• Impacts to the asset that hardly affect significance. • Impacts to the setting of an asset that have little effect on significance and no real change in our ability to understand and appreciate the significance of the asset, its historic context or character.

7.2.19 The predicted level of effect is based upon the consideration of magnitude of impact and sensitivity of the resource/receptor to come to a professional judgement of how important this effect is.

7.2.20 The matrix is not intended to mechanise judgement of the Significance of Effect, but to act as a check to ensure that judgements regarding heritage importance and the asset's Sensitivity to Impact and Magnitude of Effect arrive at a level of significance of the effect that is reasonable and balanced. In terms of EIA, only Substantial, Major, and Moderate effects are considered significant. These are shaded grey in Table 7.4.

Table 7.4 Level of effect

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Negligible
High	Substantial	Major	Moderate	Negligible
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Minor	Negligible
Negligible	Negligible	Negligible	Negligible	Negligible

7.2.21 Once the significance of effect has been established, the next step is to assess the nature (or direction) of the effect which can be 'beneficial' or 'adverse'. If the Proposed Development would enhance heritage values or the ability to appreciate them, then the impact on heritage significance would be deemed to be positive, therefore the nature of the effect is attributed as 'beneficial'. However, if the proposed development would fail to preserve heritage values or impairs their appreciation by affecting the receptor's heritage significance negatively, then the nature of the effect would be deemed to be 'adverse'.

Consultation

7.2.22 An EIA Scoping Report, including a chapter relating to the historic environment (built heritage and archaeology), has been submitted.

7.2.23 LBH's EIA Scoping Opinion as issued on 12 October 2026. However, comments received from the e Greater London Archaeological Advisory Service (GLAAS) and from the Council's Conservation Officer have been noted in this assessment and within Appendix 7.1.

7.2.24 In terms of assessing the Heathrow Airport Expansion plans cumulatively, it is not possible to account for this as a cumulative scheme when no environmental assessments relating to that proposal have been published. Consultation with Heathrow Airport Limited will be undertaken through the determination process for the planning application.

7.2.25 The assessment has also been informed by a review of available historic environment data, including information obtained from the Greater London Historic Environment Record (GLHER) and relevant planning policies.

Impacts scoped out of assessment

7.2.26 No operational impacts on known or potential archaeological remains are anticipated. Any impacts on archaeological remains would occur during construction as a result of ground disturbance, while the operation of the Proposed Development would not affect any surviving buried archaeological remains. Therefore, the impacts of the operational phase on buried archaeological remains have been scoped out of this assessment.

Table 7.5 Impacts scoped out of the assessment

Potential impact	Justification
Operation phase	
Buried Archaeological Assets within the Northern Part of the Site	The operation of the Proposed Development is not anticipated to affect any buried archaeological remains that may be present within the Site.
Previously Unidentified Archaeological Assets	The operation of the Proposed Development is not anticipated to affect any buried archaeological remains that may be present within the Site.

Assumptions and Limitations

7.2.27 The HEDBA has been compiled using primary and secondary information derived from a variety of sources. It has been assumed that this data, as well as that derived from other secondary sources is reasonably accurate at the time of writing. The Greater London Historic Environment Record (GLHER) can be limited because records are not based on a systematic search of the county, but rather the records are likely reliant upon chance finds, opportunities for research and public contribution. Grid coordinates recorded on the GLHER may be rounded to such an extent that the actual location of the asset can no longer be identified.

7.2.28 It is assumed that the GLHER datasets used throughout this assessment and their mapping are reasonably accurate and up to date, with designated heritage assets and monuments records having been assigned accurate dating and conclusions.

7.3 Baseline conditions

Current Baseline

7.3.1 Information on the historic environment was collected through a detailed desktop review of existing studies and datasets. The information gathered is set out in Appendix 7.1: Historic Environment Desk-Based Assessment, which principally used data available from the Greater London Historic Environment Record (GLHER) within a 750m study area around the Site, as well as historical mapping, LiDAR data, and aerial photography available online.

7.3.2 An archaeological evaluation undertaken in 2001 within the northern part of the Site identified a small number of archaeological features dating to the Prehistoric, Roman, and Post-Medieval periods, together with features of unknown date. Therefore, the archaeological potential and significance of the northern part of the Site are better understood than those of the southern part of the Site, where archaeological potential has been assessed based on nearby archaeological remains and documentary sources.

7.3.3 However, it is possible that any surviving archaeological remains within the Site have been affected by modern ground disturbance associated with recent development and by a former wooded area shown on historic mapping occupying the southern part of the Site. During the site walkover survey, evidence of modern disturbance was observed across parts of the southern area of the Site. Whilst some disturbance appeared, from surface inspection, to be relatively deep and extensive, the precise nature, extent and depth of disturbance are not currently known.

7.3.4 The HEDBA identified evidence for multi-period archaeological activity within the 750m study area. The earliest activity is represented by isolated findspots of Palaeolithic and Neolithic date, while more substantial evidence dates from the Neolithic to Iron Age periods, including settlements, field systems, trackways, waterholes, structures and cremation burials. Within the Site, a Late Bronze Age or Early Iron Age ditch was identified during a previous archaeological evaluation.

7.3.5 Evidence of Romano-British activity is well represented within the study area, comprising occupation and agricultural features such as enclosures, field systems, pits, wells, waterholes and structures. A possible Roman ditch was recorded within the Site during archaeological evaluation, although a Roman date could not be securely confirmed. Limited evidence of Early Medieval activity has been identified within the wider study area, primarily in the form of settlement-related features.

7.3.6 Medieval remains recorded within the study area include settlement activity associated with Sipson and surrounding settlements, together with agricultural features such as ridge and furrow cultivation.

7.3.7 Post-Medieval activity is represented within both the Site and the wider study area. Archaeological evaluation identified a number of Post-Medieval cut features within the Site, potentially associated with the historic settlement of Sipson, while Post-Medieval agricultural

land use is evidenced by former field boundaries and ridge and furrow earthworks recorded within the study area.

7.3.8 Modern heritage assets within the study area are limited and predominantly comprise Second World War features located at some distance from the Site.

7.3.9 In addition, the Site lies within the Heathrow Archaeological Priority Zone (APZ), an area identified as having high archaeological potential and containing significant remains dating from the Prehistoric to the Modern periods. Extensive archaeological investigations associated with Heathrow Airport and mineral extraction have identified evidence of Prehistoric, Roman, Early Medieval and Medieval activity, including settlements, field systems and agricultural landscapes. The Site also lies immediately north of the proposed Sipson Archaeological Priority Area, where archaeological investigations have identified evidence of activity dating from the Mesolithic to the Medieval period..

7.3.10 The HEDBA assesses the archaeological potential as follows:

- Prehistoric: high potential for the survival of archaeological remains, which if present, are likely to be of local or regional significance.
- Palaeolithic: low potential for the survival of archaeological remains, which if present, are likely to be of local or regional significance.
- Mesolithic: low potential for the survival of archaeological remains, which if present, are likely to be of local or regional significance.
- Neolithic: moderate potential for the survival of archaeological remains, which if present, are likely to be of local or regional significance.
- Bronze Age: high potential for the survival of archaeological remains, which, if present, are likely to be of local or regional significance.
- Iron Age: high potential for the survival of archaeological remains, which, if present, are likely to be of local or regional significance.
- Roman: moderate potential for the survival of archaeological remains, which, if present, are likely to be of local significance.
- Early Medieval: low potential for the survival of archaeological remains, which, if present, are likely to be of local significance.
- Medieval: moderate potential for the survival of archaeological remains, which, if present, are likely to be of local significance
- Post-Medieval: high potential for the survival of archaeological remains, which, if present, are likely to be of local significance
- Modern: low potential for the survival of remains, which, if present, are likely to be of local significance

Future Baseline

7.3.11 In the absence of the Proposed Development, it is not anticipated that the current baseline would be subject to significant change that would affect the significance of the identified heritage assets. This is due to the significant amount of archaeological investigations previously undertaken within the 750m study area, which has resulted in a detailed and well understood current baseline. The Proposed Development lies within the Heathrow Archaeological Priority

Zone (APZ), where extensive archaeological investigations associated with mineral extraction and the development of Heathrow Airport have identified significant archaeological remains.

7.3.12 Therefore, it is not anticipated that the archaeological baseline would change significantly in the future in the absence of the Proposed Development. However, the survival, extent and condition of any buried archaeological remains within the Site cannot be fully established without further archaeological investigation.

7.4 Inherent design mitigation

7.4.1 No archaeology-specific inherent design mitigation measures have been included into the Proposed Development at this stage. The HEDBA has informed the understanding of the known and potential archaeological remains within the Site and will inform the scope of any future archaeological investigations or mitigation measures.

7.5 Potential effects prior to additional mitigation

7.5.1 Only those heritage assets that are specifically affected by the Construction phase of the Proposed Development are discussed in detail below. The Operational phase has been scoped out of this assessment, as it is not anticipated to affect any known or potential buried archaeological remains. The Proposed Development is not expected to result in any likely significant effects on the setting of archaeological assets beyond the Site boundary, given both their distance from the Site and their nature as buried archaeological remains.

Construction Phase

Buried Archaeological Assets within the Northern Part of the Site

Sensitivity of the Receptor

7.5.2 An archaeological evaluation undertaken within the northern part of the Site in 2001 identified a number of cut features, the majority of which dated to the Post-Medieval period. A north-south aligned ditch of Late Bronze Age or Early Iron Age date was also recorded, with its terminal identified within the evaluated area. This feature may be associated with a Bronze Age field system recorded to the east of the Site. A ditch of possible Roman date was also identified. The ditch was dated as possible Roman due to its alignment, which was similar to that of Romano-British linear features to the south-east, and may therefore represent part of a field system. The Post-Medieval features comprised a number of postholes and ditches, several of which were interpreted as being associated with the historic settlement of Sipson. Additional undated features were also recorded, including a posthole, a pit and a piglet burial. These remains are considered to be of local archaeological interest and may contribute to local research objectives. Accordingly, the sensitivity of the receptor is assessed as **low**.

Magnitude of Impact

7.5.3 According to the parameters plan for the Proposed Development, the main data centre building, including external plant and an administration block, would occupy the majority of the central part of the Site, with ancillary buildings located within the northern part of the Site, and green buffer zones surrounding the built development. Groundworks associated with the construction of the main data centre building, ancillary buildings, and landscaping have the potential to

directly affect any surviving buried archaeological remains, resulting in their substantial disturbance or complete removal. Therefore, the magnitude of impact is assessed as **high**.

Significance of Effect

7.5.4 Without additional mitigation, it is predicted that there would be a **high** magnitude of impact on the **low** sensitivity receptors comprising the cut features identified within the northern part of the Site, which would result in a **moderate adverse** effect, which is **significant**.

Previously Unidentified Archaeological Assets

Sensitivity of the Receptor

7.5.5 Desk-based research undertaken during the preparation of the HEDBA identified a total of 92 known archaeological assets within the 750m study area. These assets date from the Prehistoric to the Modern periods. The majority are of Prehistoric and Post-Medieval date, although archaeological remains from all periods are recorded. The potential for encountering archaeological remains and their significance is discussed in section 7.3.8. In addition, the findings of the archaeological evaluation which was undertaken in 2001 in the northern part of the Site indicate the possible presence of further associated archaeological features within the Site. Previous archaeological investigations within the study area have demonstrated a pattern of multi-period settlement. However, the southern part of the Site appears to have been heavily disturbed. Therefore, the extent to which any buried archaeological remains have been preserved is uncertain.

7.5.6 Any archaeological remains present within the Site are most likely to be of local significance. However, should they contribute to a better understanding of the Prehistoric landscape of the Lower Thames Region, their significance could increase to regional level. Accordingly, the sensitivity of the receptor is assessed as **low** or **medium**.

Magnitude of Impact

7.5.7 Any groundworks in connection with the Proposed Development, including the construction of the main data centre building, ancillary buildings and landscaping, would have a direct effect on any buried archaeological remains that may be present within the Site and could result in their substantial disturbance or complete removal. Therefore, the magnitude of impact is assessed as **high**.

Significance of Effect

7.5.8 Without additional mitigation, it is predicted that there would be a **high** magnitude of impact on the **low** or **medium** sensitivity receptors comprising possible previously unidentified buried archaeological remains within the Site. If present, this would result in a **moderate adverse** effect or **major adverse** effect, both of which are **significant**.

Operational Phase

7.5.9 No operational impacts or effects are anticipated on any known or potential archaeological remains within the area of the Proposed Development or the wider study area.

7.6 Additional Mitigation

Construction Phase

Buried Archaeological Assets within the Northern Part of the Site

7.6.1 Within the northern part of the Site, a previous archaeological evaluation identified a series of cut features, predominantly dating to the Post-Medieval period, but including a Prehistoric linear feature, a possible Roman linear feature, and a few undated features. Therefore, subject to further engagement with the LPA Archaeological Officer, additional archaeological investigation may be required. This is because both the Prehistoric and possible Roman linear features may be associated with field systems recorded in the vicinity of the site, and additional related features may survive that would enhance understanding of these complexes. Furthermore, previous archaeological investigations within the study area demonstrated a pattern of multi-period activity and settlement, suggesting that remains from other periods may also be present in proximity to the Prehistoric and Roman features.

7.6.2 Any archaeological investigation would enable the identification, assessment and recording, of archaeological remains within the Site. The scope of any such programme of archaeological works would first need to be set out in a Written Scheme of Investigation (more than one may be required) to be submitted to and approved by the LPA Archaeological Officer subject to suitably worded planning conditions following the granting of consent.

Previously Unidentified Archaeological Assets

7.6.3 Previously unidentified archaeological assets may be present within the Site, given its location within an Archaeological Priority Zone and the relatively large number of multi-period heritage assets recorded within the study area, dating from the Prehistoric to the Post-Medieval periods. Furthermore, the southern part of the Site has not been subject to archaeological investigation, and therefore there is currently no evidence for the presence or absence of buried archaeological remains within this area. Although the Site, particularly its southern part, appears to have been subject to significant ground disturbance, archaeological remains may still survive, as the nature and extent of this disturbance is currently unknown.

7.6.4 Therefore, subject to further engagement with the LPA Archaeological Officer, additional archaeological investigation may be required within the southern part of the Site to identify, assess and record any buried archaeological remains that may be present. Such work would also help to establish the nature and extent of any previous ground disturbance within this part of the Proposed Development. The scope of any such programme of archaeological works would first need to be set out in a Written Scheme of Investigation (more than one may be required) to be submitted to and approved by the LPA Archaeological Officer subject to suitably worded planning conditions following the granting of consent.

7.6.5 In addition, any archaeological investigation associated with the Proposed Development would provide an opportunity to enhance understanding of the archaeology of the wider area. Given the Site's location within the Heathrow Archaeological Priority Zone, an area considered to have high potential for the preservation of Prehistoric remains, the results of any archaeological investigations could provide additional evidence for understanding the landscape of the Lower Thames region. Furthermore, the findings could contribute to local and regional archaeological research objectives identified within the Regional Research Framework.

7.7 Residual effects

Construction Phase

Buried Archaeological Assets within the Northern Part of the Site

Magnitude of Impact

7.7.1 Following the implementation of appropriate mitigation measures, as outlined in section 7.6, any buried archaeological remains would be identified, assessed and recorded, prior to the commencement of groundworks associated with the Proposed Development. Although the proposed mitigation would ensure that any archaeological remains are appropriately investigated and recorded, the groundworks required for the Proposed Development would still directly affect those remains, potentially resulting in their substantial disturbance or complete removal. Consequently, the magnitude of impact on these archaeological receptors would remain **high**.

Significance of Effect

7.7.2 Based on Historic England's (2019) definitions of heritage interests, the significance of any buried archaeological remains associated with the cut features identified during the archaeological evaluation within the northern part of the Site would derive primarily from their archaeological interest and evidential value, reflecting the potential to provide evidence of the development and evolution of the area and of the people that inhabited and used it. Any remains associated with the Post-Medieval settlement of Sipson would be of historic and archaeological interest, as they could contribute to an understanding of the settlement's development, character, nature, extent, and organisation. Given the nature of these assets as buried archaeological remains of unknown survival and condition, they are not considered to be of architectural or artistic interest, and their significance is not derived from aesthetic value.

7.7.3 Following the methodology as set out in this chapter, the significance of effect on any buried archaeological remains within the northern part of the Site, following the implementation of the mitigation measures, would remain **moderate adverse,** which is **significant**. However, as discussed above, in paragraph 7.7.2, the significance of any such remains derives primarily from their archaeological evidential value. As such, the proposed mitigation would secure a detailed record of their character, extent, chronology and significance prior to their disturbance or loss as a result of the Proposed Development. It is considered that the information obtained through the proposed mitigation measures comprising archaeological investigation, would largely offset the moderate adverse effect. Therefore, applying professional judgement, the residual significance of effect on any such remains is assessed as **negligible**, which is **not significant**.

Previously Unidentified Archaeological Assets

Magnitude of Impact

7.7.4 Following the implementation of appropriate mitigation measures, as outlined in section 7.6, any previously unidentified archaeological assets, that may be present, would be identified, assessed and recorded, prior to the commencement of groundworks associated with the Proposed Development. Although the mitigation would ensure that any archaeological remains are appropriately investigated and recorded, the groundworks required for the Proposed Development would still directly affect those remains, potentially resulting in their substantial disturbance or complete removal. Consequently, the magnitude of impact on these archaeological receptors would remain **high**.

Significance of Effect

7.7.5 As with the buried archaeological assets within the northern part of the Site, the significance of any previously unidentified archaeological assets would derive primarily from their

archaeological interest and evidential value, as they may provide evidence of patterns of settlement, land use and human activity within the wider area. Given the nature of these assets as buried archaeological remains of unknown survival and condition, they are not considered to be of architectural or artistic interest, and their significance is not derived from aesthetic value.

7.7.6 Following the methodology as set out in this chapter, the significance of effect on any previously unidentified buried archaeological remains within the Site, following the implementation of the mitigation measures, would remain **moderate adverse** or **major adverse,** depending on the nature of the archaeological remains (see paragraph 7.5.6)**,** and would therefore be **significant**. However, the significance of any such remains would derive primarily from their archaeological evidential value. The proposed mitigation would secure a detailed record of their character, extent, chronology and significance prior to their disturbance or loss as a result of the Proposed Development. It is considered that the information obtained through the proposed mitigation measures comprising archaeological investigation, would largely offset the moderate or major adverse effect. Therefore, applying professional judgement, the residual significance of effect on any such remains is assessed as **negligible**, which is **not significant**.

Operational Phase

7.7.7 No operational impacts or effects are anticipated on any known or potential archaeological remains within the area of the Proposed Development or the wider study area.

7.8 Implications of Climate Change

7.8.1 It is not anticipated that climate change will have a significant effect on the current or future archaeological baseline. Therefore, there would be no change to the conclusions of this assessment or to the additional mitigation required.

7.9 Cumulative effects

7.9.1 Potential cumulative effects have been considered in relation to the schemes listed in Chapter 5 and shown in Figure 5.1. The schemes scoped into the cumulative effects assessment comprise data centre developments within 5km of the Site and residential or commercial developments within 2.5km of the Site.

7.9.2 The closest commercial scheme comprises the redevelopment of a site approximately 750m south-east of the Site to accommodate a seven-storey hotel (planning reference 829/APP/2023/312). The remaining schemes are located between 1.65km and 2.44km from the Site. Data centre schemes are located between 2.1km and 4.9km from the Site. Given these distances, none of the submitted or approved schemes shown on Figure 5.1 are considered likely to result in cumulative effects on any known or potential archaeological remains within the Site.

7.9.3 The proposed expansion of Heathrow has also been considered. However, at the time of preparing this assessment, a Development Consent Order (DCO) has not been submitted, and the details of the proposed works remain uncertain. Heathrow Airport expansion has therefore not been included within the cumulative effects assessment.

7.9.4 If the Proposed Development is approved by the time Heathrow Airport's Expansion is submitted, then the Proposed Development would constitute the baseline for Heathrow Airport's DCO submission.

7.10 Summary

7.10.1 This chapter (informed by the HEDBA) sets out the conclusions of the assessment of the potential effects of the Proposed Development on identified and potential archaeological assets. A summary of the assessment is set out in Table 7.6. As a result of the proposed mitigation measures, it is not considered that the Proposed Development would result in any likely significant adverse effects on any surviving archaeological remains within the Site or the surrounding study area.

7.11 References

- Chartered Institute for Archaeologists (CIfA) (2014, updated 2020) *Code of Conduct*
- Chartered Institute for Archaeologists (CIfA) (2014, updated 2020) *Standard and guidance for historic environment desk-based assessment*
- CIfA Webpage: Expectations for professional archaeologists to deliver public benefit: https://www.archaeologists.net/profession/publicbenefit/professionalexpectations
- Historic England (2008) *Conservation principles, Policies and Guidance: for the sustainable management of the historic environment*
- Historic England (2017) *The Setting of Heritage Assets* (Planning Note 3)
- Historic England (2019) *Statements of Significance* (Historic England Advice Note 12)
- Levelling-up and Regeneration Act (2023) https://www.legislation.gov.uk/ukpga/2023/55
- Mann, B. (2023) *Delivery of Public Benefit and Social Value Guidance for Archaeology in the Planning Process,* Association of Local Government Archaeological Officers (ALGAO)
- Ministry of Housing, Communities & Local Government (December 2024) *National Planning Policy Framework*
- Ministry of Housing, Communities & Local Government (August 2024) *National Planning practice Guidance*

7.12 Assessor information

Chapter	Responsibility	Name	Qualifications	Assessor information
Archaeology	Savills	Konstantinos Bompotis	BA, MA, MBA, ACIfA	Konstantinos is a Senior Archaeologist within Savills' Heritage & Townscape Team. He has been involved as a professional archaeologist in numerous projects across the UK and internationally. As a Senior Archaeologist, Konstantinos is responsible for preparing technical archaeological documentation, including Desk-Based Assessments and Written Schemes of Investigation. He also monitors site progress and liaising with stakeholders involved in each project.
	Savills	Dr Rachel Scrutton	PhD, MCIfA	Rachel is an Associate Director of Archaeology within the Savills' Heritage and Townscape Team with over 12 years' experience as a professional archaeologist throughout the UK. Rachel's role at Savills includes the writing of technical reports such as Archaeological Desk-Based Assessments, Environmental Impact Assessments, Settings Assessments, and Written Schemes of Investigations for archaeological fieldwork.

Table 7.6 Summary of effects

Receptor	Receptor sensitivity	Description of potential impact	Proposed mitigation	Residual effect	Significant / not significant
Construction Phase					
Buried Archaeological Assets within the Northern Part of the Site	Low	Groundworks associated with the Proposed Development may result in the partial or complete removal, and disturbance of buried archaeological remains. High magnitude of impact.	Appropriate archaeological mitigation, to be agreed with the LPA Archaeological Officer	Negligible	Not Significant
Previously Unidentified Archaeological Assets	Low or Medium	Groundworks associated with the Proposed Development may result in the partial or complete removal, and disturbance of buried archaeological remains. High magnitude of impact.	Appropriate archaeological mitigation, to be agreed with the LPA Archaeological Officer	Negligible	Not Significant

7.13 Mitigation commitments Summary

Table 7.7 Summary for Securing Mitigation

Identified receptor	Type and purpose of mitigation measure (prevent, reduce, offset, enhance)	Means by which mitigation may be secured (e.g. planning condition / legal agreement)	Delivered by	Auditable by
Construction Phase				
Buried Archaeological Assets within the Northern Part of the Site	Appropriate archaeological investigation to identify, assess and record any archaeological remains, ensuring their preservation by record.	Planning Condition	Archaeological Fieldwork Subcontractor	LPA
Previously Unidentified Archaeological Assets	Appropriate archaeological investigation to identify, assess and record any archaeological remains, ensuring their preservation by record.	Planning Condition	Archaeological Fieldwork Subcontractor	LPA