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# **Avondale Drive, Hayes, Hillingdon**

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## **Archaeological Desk-Based Assessment**



**Project:** Avondale Drive, Hayes, Hillingdon

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### **Assumptions and Limitations**

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

In addition, the records held by the GLHER, obtained on represent a record of a wide range of information derived from historical sources and previous archaeological discoveries and does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.

### **Compliance**

This document has been prepared in accordance with the requirements stated within the National Planning Policy Framework (NPPF; (Ministry of Housing, Communities & Local Government, July 2021) National Planning Practice Guidance (NPPG; Ministry of Housing, Communities & Local Government) and the Chartered Institute for Archaeologists' Standard and guidance for historic environment desk-based assessment, and Standard and guidance for commissioning work on, or providing consultancy advice on, archaeology and the historic environment (Chartered Institute for Archaeologists, December 2017).

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## Executive summary

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### **Project background**

*Savills Heritage and Townscape have been appointed by London Borough of Hillingdon to prepare an Archaeological Desk-Based Assessment (ADBA) to assess the archaeological constraints in relation to proposed re-development of the site at Avondale Drive, Hayes, Hillingdon. This desk-based study assesses the impact of the proposed development on buried heritage assets (archaeological remains). Although above ground heritage assets (historic structures) are not discussed in detail, they have been noted where they assist in the archaeological interpretation of the Site.*

*The proposed development is described as: "Development in outline (with all matters reserved) for residential floorspace (Class C3) to comprise: demolition of all existing buildings and structures; erection of new buildings; new pedestrian and vehicular accesses; associated amenity space, open space, landscaping; car and cycle parking spaces; plant, refuse storage, servicing area and other works incidental to the proposed development; and Detailed planning consent for Block A comprising 30 residential units (Class C3); new pedestrian access; associated amenity space and landscaping; cycle parking, refuse storage, and other associated infrastructure"*

### **Archaeological considerations**

*The results of research from data held at the GLHER, as well as cartographic and archive sources, suggests that the Site has a low to negligible potential for archaeological remains of Romano-British and post-medieval date, a low potential for remains of prehistoric, Anglo-Saxon, and medieval date, and a high potential for remains of modern date. If present, any remains would generally likely be of low to moderate local significance.*

*The Site has undergone several phases of significant development and redevelopment since the beginning of the 20<sup>th</sup> century, with a major phase of demolition and subsequent reconstruction of buildings within the Site in the 1970s. All of these activities will have had a destructive impact upon any below ground archaeological deposits, where present.*

*It is unlikely that any archaeological remains (below ground non-designated heritage assets) on the Site would be equivalent to the significance of a scheduled monument and therefore would be of lesser significance. However, the implementation of archaeological mitigation measures may be required in order to ensure that any hitherto-unknown archaeological remains are preserved and recorded appropriately.*

### **Recommendations**

*Any groundworks associated with construction at the proposed development site will impact on below-ground archaeological remains (non-designated heritage assets) where present. The below ground potential of the Site is well understood and any below ground heritage assets are not expected to preclude development on the Site.*

*In light of the assessment that the site is unlikely to yield remains of significance, it is proposed no further archaeological fieldwork is required on the Site in relation to the scheme. However, the decision for any further archaeological work, or not, rests with the Local Planning Authority's Archaeological Advisor (the Greater London Archaeological Advisory Service, GLAAS). Should archaeological fieldwork mitigation be deemed necessary this could be carried out under the terms of a standard archaeological planning condition set out under the granting of planning consent*

## 1.0 Introduction

### 1.1 Project background

- 1.1.1 Savills Heritage and Townscape have been appointed by London Borough of Hillingdon to prepare an Archaeological Desk-Based Assessment (ADBA) to assess the archaeological constraints in relation to proposed re-development of the site at Avondale Drive, Hayes, Hillingdon; centred at NGR 509957, 179728 (hereafter 'the Site'): and shown on **Figure 1**.

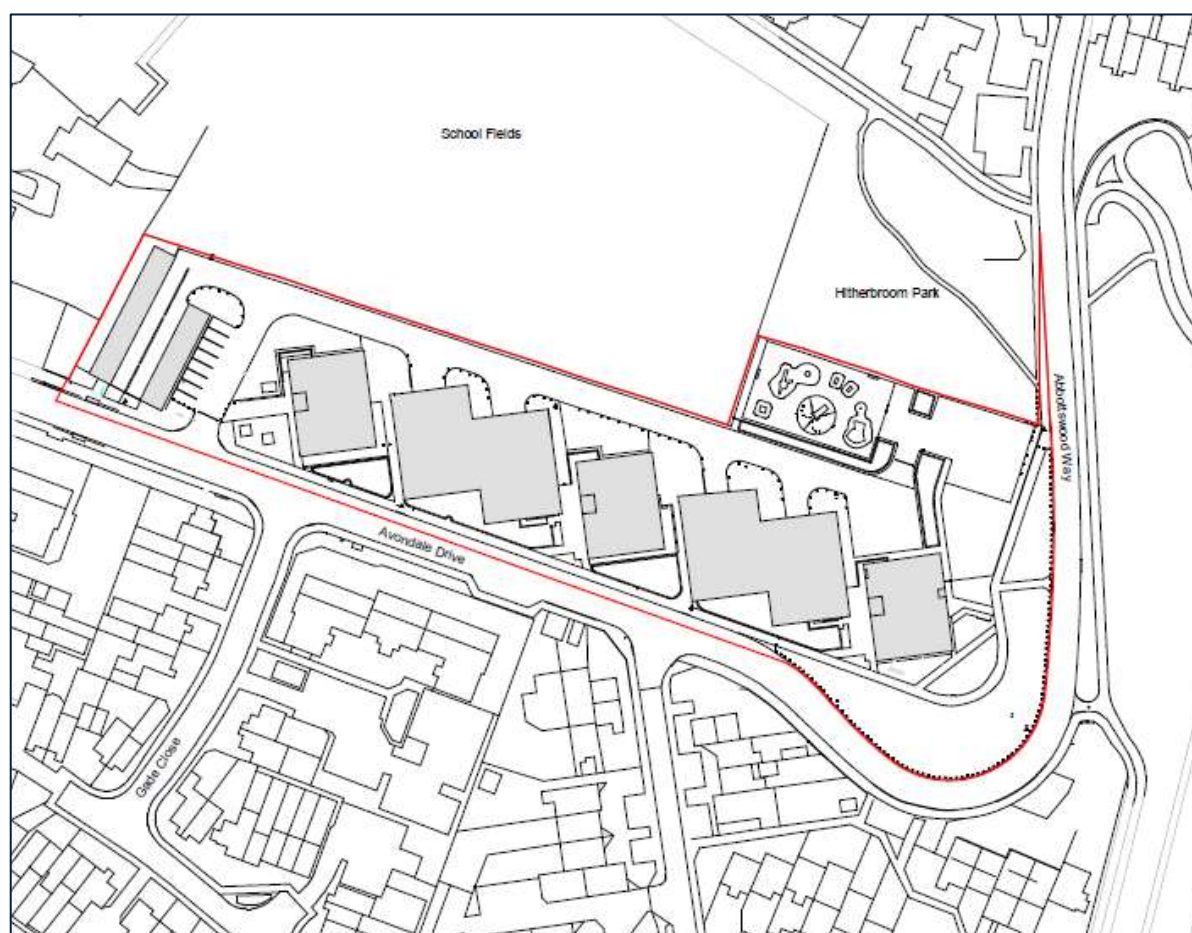


Figure 1: Aerial photograph detailing the area of the Site (outlined in red) and its immediate environs

- 1.1.2 For a full description of the proposed development the reader is referred to the Design and Access Statement (DAS) and the plans submitted as part of this hybrid planning application. This ADBA supplements further heritage considerations detailed in the Heritage, Townscape and Visual impact assessment (Savills 2021).

### 1.2 Scope, aims and objectives

- 1.2.1 This report provides a baseline of known or possible buried heritage assets (archaeological remains) within the area of proposed development, which have been identified from a broad range of standard sources. Such buried heritage assets are considered to have a degree of significance meriting consideration in planning decisions.
- 1.2.2 Professional expert opinion has been used to assess heritage significance of these potential assets, taking into account past ground disturbance that may have compromised survival. Such assets on or in the vicinity of the Site are only discussed here if they are relevant to the archaeological interpretation of the Site. Designated built heritage assets are shown on **Figure 10** for information.
- 1.2.3 Archaeology has been a material consideration in the planning process since 1990 and its value is recognised in national and local planning policy. The aim of this report is to assess the archaeological impact of the proposed development as part of a planning application to develop the Site. The aim is achieved through four objectives:
- identify the presence of any known or potential buried heritage assets that may be affected by the proposals;
  - describe the significance of such assets, in accordance with the National Planning Policy Framework (NPPF), taking into account factors which may have compromised asset survival;
  - assess the likely impacts upon the significance of the assets arising from the proposals; and
  - provide recommendations for further investigation and/or mitigation where required, aimed at reducing or removing completely any adverse effects.

### 1.3 Archaeological considerations

The proposed development site does not lie within a conservation area and does not contain any scheduled monuments, listed buildings, locally listed buildings, registered parks & gardens, world heritage sites, or archaeological priority areas. The Greater London Historic Environment Record (GLHER) lists various identified heritage assets within a 1km study area centred on the Site, and these range in date from the prehistoric to modern periods, these are detailed in **Section 3**.

## 2.0 Methodology and sources

### 2.1 Archaeological desk-based assessment

2.1.1 This assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF July 2021) and to standards specified by the Chartered Institute for Archaeologists (CIfA Dec 2014a, 2014b) and Historic England (HE 2015, 2019).

- MHCLG 2021 [Ministry of Housing, Communities and Local Government], July 2021 National Planning Policy Framework
- CIfA [Chartered Institute for Archaeologists] Dec 2014a (updated Oct 2020), Standards and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment, Reading.
- CIfA [Chartered Institute for Archaeologists] Dec 2014b (updated Oct 2020), Standards and guidance for historic environment desk-based assessment, Reading
- Historic England (Greater London Archaeological Advisory Service), 2015, Guidelines for Archaeological Projects in Greater London
- Historic England, 2019, Advice note 12: Statements of significance, Swindon

2.1.2 In order to determine the full historic environment potential of the Site, a broad range of standard documentary and cartographic sources, including results from any archaeological investigations within the Site and a 1km radius study area around it were examined in order to determine the likely nature, extent, preservation and significance of any known or possible buried heritage assets that may be present within or adjacent to the Site.

2.1.3 The table below provides a summary of the key data sources consulted. Occasionally there may be reference to assets beyond this study area, where appropriate, e.g. where such assets or investigations contribute to current understanding of the historic environment.

Table 1: Sources consulted

| Source           | Data                                                                                    | Comment                                                                                                                                                                              |
|------------------|-----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Historic England | National Heritage List (NHL) with information on statutorily designated heritage assets | Statutory designations (scheduled monuments; statutorily listed buildings; registered parks and gardens; historic battlefields) can provide a significant constraint to development. |

| Source                          | Data                                                                             | Comment                                                                                                                                                                                                                                                                         |
|---------------------------------|----------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Historic England GLAAS          | Greater London Historic Environment Record (GLHER)                               | Primary repository of archaeological information. Includes information from past investigations, local knowledge, find spots, and documentary and cartographic sources.                                                                                                         |
| Historic England                | National Record of the Historic Environment (NRHE)                               | National database maintained by Historic England. Not as comprehensive as the HER but can occasionally contain additional information. Accessible via Pastscape website. This was consulted for the Site and its immediate vicinity only.                                       |
| Local Planning Authority        | Archaeological priority area or area of Special Archaeological Significance      | Area of interest identified by the local authority. There is likely to be a requirement for archaeological investigation (initially a desk-based assessment) as part of any planning application.                                                                               |
| British Geological Survey (BGS) | Solid and drift geology digital map; online BGS geological borehole record data. | Sub-surface deposition, including buried geology and topography, can provide an indication of potential for early human settlement, and potential depth of archaeological remains.                                                                                              |
| Internet                        | Web-published local history; Archaeological Data Service.                        | Many key documentary sources, such as the Survey of London, and local and specialist studies are now published online and can be used to inform the archaeological and historical background. The Archaeological Data Service includes an archive of digital fieldwork reports. |
| The client                      | Development proposals, drawings, design and access statement.                    | Key information on the proposed scheme and project background.                                                                                                                                                                                                                  |

2.1.4 The location of known archaeological assets within the study area, as identified by the sources above, or during the course of research for this assessment. These are referenced in the text by their individual GLHER number.

2.1.5 All distances quoted in the text are approximate (within 5-10m). Past archaeological investigations are recorded in the GLHER by a point or a site extent polygon. **Figure 2** shows the location of these investigations within the study area, investigations in the immediate vicinity of the Site are referenced by their individual GLHER number.

2.1.6 The red line boundary of the proposed development Site on the figures within this report is indicative and for illustrative purposes only. The formal red line boundary for the development is shown in **Figure 1**.

## 2.2 Site visit

2.2.1 In order to produce this report a walkover site visit was carried out 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.

## 2.3 Legislative and planning framework

2.3.1 **Appendix 2** of this Archaeological Desk-Based Assessment sets out the full legislative and planning framework in relation to the proposals, for context a brief summary is provided here:

### Planning framework

2.3.2 The Government issued a revised version of the NPPF in July 2021 (MHCLG 2021) and supporting revised Planning Practice Guidance in 2018 (MHCLG 2018). The NPPF requires the significance of heritage assets to be considered in the planning process, whether designated or not. Relevant paragraphs of NPPF Section 16 are reproduced with commentary in **Section 6**.

### Regional and local planning policy

2.3.3 This assessment has also be undertaken in accordance with Section 7 of the London Plan (March 2021), Policy HC1 Heritage; London Borough of Hillingdon, *Local plan part 1: Strategic Policies* (November 2012); and London Borough of Hillingdon, *Local plan part 2: Development Management Policies* (January 2020); in particular *Policy DMHB1 on Heritage Assets*.

## 2.4 Assessing heritage significance

2.4.1 The NPPF 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.”*

2.4.2 The determination of the significance of a heritage asset (including archaeological remains) is based on statutory designation and/or professional judgement against these values (or interests). The definition of these interests is provided in the NPPF glossary and reproduced in full below:

**Historic interest:** *An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our 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.*

**Archaeological interest:** *There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*

**Architectural and artistic interest:** *These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.*

2.4.3 In legislation and designation criteria, the terms ‘special architectural or historic interest’ of a listed building and the ‘national importance’ of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset’s significance.

2.4.4 These interests are reflected and expanded upon in the Historic England guidance (Advice Note 12 Statements of Significance, 2019):

**Historic interest:** *the ways in which the asset can illustrate the story of past events, people and aspects of life (illustrative value, or interest). It can be said to hold communal value when associated with the identity of a community. Historical interest considers whether the asset is the first, only, or best surviving example of an innovation of consequence, whether related to design, artistry, technology or social organisation. It also considers an asset’s integrity (completeness), current use / original purpose, significance in place making, associative value with a notable person, event, or movement.*

**Archaeological interest:** *the potential of the physical remains of an asset to yield evidence of past human activity that could be revealed through future archaeological investigation. This includes above-ground structures and landscapes, earthworks and buried or submerged remains, palaeoenvironmental deposits, and considers date, rarity, state of preservation, diversity/complexity, contribution to published priorities (research value), supporting documentation, collective value and comparative potential, and sensitivity to change.*

**Architectural and artistic interest:** *derived from a contemporary appreciation of an asset’s aesthetics. Architectural interest can include the design, construction, craftsmanship and decoration of buildings and structures. Artistic interest can include the use, representation or influence of historic places or buildings in artwork. It can also include the skill and emotional impact of works of art that are part of heritage assets or assets in their own right.*

2.4.5 These values (or interests) encompass the criteria that Historic England are obliged to consider when statutorily designating heritage assets.

## 2.5 Assessing harm

2.5.1 Professional judgement is used to consider the impact of future development on the significance a known or potential heritage asset. This is assessed in NPPF terms as ‘no harm’, ‘less than substantial harm’, ‘substantial harm’ or ‘total loss of significance’.

2.5.2 The following levels of harm may be identified during this assessment:

**Substantial harm:** *The Planning Practice Guide (PPG) discusses ‘substantial harm’ (using listed buildings as an example) and states that ‘an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed’ (PPG Paragraph: 018 Reference ID: 18a-018-20190723 Revision date: 23 07 2019).*

**Less than substantial harm;** and

**No harm (or ‘preservation’),** *such that the attributes identified within the statement of significance of the heritage asset have not been harmed.*

## 2.6 Archaeological remains

2.6.1 The National Planning Policy Framework guidance identifies two categories of non-designated heritage assets of archaeological interest:

- **(1)** Those that are demonstrably of equivalent significance to scheduled monuments and are therefore considered subject to the same policies as those for designated heritage assets (National Planning Policy Framework footnote 68). They are of 3 types:
  - those that have yet to be formally assessed for designation.
  - those that have been assessed as being nationally important and therefore, capable of designation, but which the Secretary of State for Digital, Culture, Media and Sport has exercised his/her discretion not to designate.
  - those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979 because of their physical nature.

2.6.2 The reason why many nationally important monuments are not scheduled is set out in the document Scheduled Monuments, published by the Department for Digital, Culture, Media and Sport. Information on location and significance of such assets is found in the same way as for all heritage assets. Judging whether sites fall into this category may be assisted by reference to the criteria for scheduling monuments.

- (2) Other non-designated heritage assets of archaeological interest. By comparison this is a much larger category of lesser heritage significance, although still subject to the conservation objective. On occasion the understanding of a site may change following assessment and evaluation prior to a planning decision and move it from this category to the first.

2.6.3 Where an asset is thought to have archaeological interest, the potential knowledge which may be unlocked by investigation may be harmed even by minor disturbance, because the context in which archaeological evidence is found is crucial to furthering understanding.

2.6.4 The guidance also notes that *“decision-making regarding such assets requires a proportionate response by local planning authorities”* and *“it is estimated that following the initial assessment of archaeological interest only a small proportion – around 3% – of all planning applications justify a requirement for detailed assessment.”*

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## 3.0 Historic environment baseline

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### 3.1 Introduction

- 3.1.1 The following section provides a brief summary of the historical development of the Site and its environs by historic period, compiled from sources as listed in **Table 1** and **Appendix 1** and drawing on previous studies in the area surrounding the Site with due acknowledgement.

### 3.2 Site description

- 3.2.1 The site is located in Avondale Drive, Hayes, London Borough of Hillingdon (LBH). It is bounded: by Minet school sport grounds and Avondale green area to the north, by Abbotswood Way and The Parkway (A312) to the east, by Avondale Drive to the south, and by the buildings of Minet Infant School and Minet Junior School to the west.
- 3.2.2 The site comprises of three 13 storey towers in red/brown brick (named Wellings House, Fitzgerald House, and Glenister House), containing 144 existing homes and a number of parking structures and garages, rising to one storey. It also includes a green area to the north of Wellings House called Hitherbroom Park.
- 3.2.3 The buildings' architecture and layout follows the architecture and urban design principles of the time they were built (1970's) and the dominant material used is red/brown brick. There is a lot of space between the various blocks, which remains unusable, due to the shape, orientation, planting and lack of natural surveillance, though the site does benefit from close proximity to parks.

### 3.3 Soils and geology

- 3.3.1 The predominant soil type within the vicinity of the Site consists of freely draining slightly acid loamy soils (Magic.Defra). The underlying geology consists of London Clay Formation - Clay, Silt and Sand with superficial deposits of the Lynch Hill Gravel Member - Sand And Gravel (BGS.ac.uk).
- 3.3.2 The surface of the Lynch Hill Gravel within this area is noted to be highly degraded and within the Site area further complexities exist due to the presence of the small Thames tributary (Yeading Brook) that is associated with a sequence of sediments defined as the Crane Valley Gravel (OXA 1998). The Yeading is presently a south flowing tributary of the Thames.

### 3.4 Overview of past archaeological investigations

- 3.4.1 Several archaeological investigations (both desk-based and fieldwork) have been undertaken within the wider study area. These investigations (either GLHER points or events) are shown in **Figure 2** and detailed in **Appendix 1**. Those that cover the area of the Site and those immediately adjacent to the Site are summarised below:

#### **Harefield to Southall [gas pipeline]: Excavation and Watching Brief**

- 3.4.2 Network Archaeology Ltd undertook an archaeological evaluation, excavation and watching brief (Event ID: **ELO11460**) were carried out along the route of the proposed gas pipeline between Harefield in the London Borough of Hillingdon and Southall in the London Borough of Ealing. Two phases of supplementary trench evaluations in 17 plots were carried out. Excavations were carried out in 10 plots and a watching brief was carried out for a total of 75 plots. The archaeological evidence found consisted of: the edge of a possible Neolithic/Bronze Age settlement in Harefield; Late Iron Age/Early Roman settlement edge activity in the Newyears Green and Ickenham areas; the remains of a substantial Iron Age/Early Roman settlement in the Gutteridge Wood area, north east of Hillingdon; and Medieval agricultural activity to the north and east of Bayhurst Wood Countryside Park, south of Harefield.

#### **Harefield to Southall Natural Gas Pipeline, Hillingdon and Ealing: analysis**

- 3.4.3 Network Archaeology Ltd provided an analysis and archive report of the archaeological work undertaken during the installation of the Harefield to Southall natural gas pipeline (Event ID: **ELO14907**). During the construction of the pipeline a total of seventeen sites (identified by prior trial trench work and watching brief activity) were excavated. The watching brief also identified isolated or undated archaeological features and deposits within a further ten plots. Transient activity appeared to be taking place along the route of the pipeline throughout the prehistoric period, with the earliest evidence for agriculture activity appearing during the late Mesolithic/early Neolithic periods (Plots 8, 20, 23 and 46). Cremation burials dating to the mid to late Bronze Age (plot 23 and potentially plot 47) and the remnants of a possible late Bronze Age/early Iron Age timber monument (with associated well) at plot 8 were identified. A Romano-British settlement, which may have included a shrine, was identified in plot 46. Evidence for medieval activity along the pipeline was slight, with features relating to agriculture identified within plots 13 and 23; plot 23 also providing evidence of possible low-level

metalworking. Field boundaries dating from the post-medieval period were also identified and there was also evidence of low-level metal working taking place within plots 23 and 68. The report did not provide clear indications as to where the plots were situated, they were plotted by using grid references and site plans in a previous report produced on the project- ELO11460/SLO83001.

#### **Uxbridge Road (Nos 1-3), Hayes, Hillingdon, UB4**

- 3.4.4 From May to June 2015 Quaternary Scientific undertook an Environmental Assessment (Event ID: **ELO15534**) at 1-3 Uxbridge Road, Hillingdon in advance of proposed development on the site. Geoarchaeological investigations were conducted to clarify the nature of the sub-surface stratigraphy across the site, and to evaluate the potential of the sequences to contain evidence for Palaeolithic archaeology or biological remains. A total of eight test pits were monitored. Lynch Hill Gravel or Holocene deposits associated with the Yeading Brook were identified overlying London Clay bedrock. No humic or manganese staining was identified within the Lynch Hill Gravel. No organic/soil horizons were identified in the Yeading Brook alluvium. No further work was recommended.

#### **Southall Gasworks [The Straight] Southall Ealing UB1 1QX:**

- 3.4.5 Three test-pits (Event ID: **ELO17250**) were excavated in areas thought best to preserve Pleistocene Brickearth sediments (Langley Silt) overlying Lynch Hill Member river terrace deposits, with the purpose of recording sections in situ, and recovering suites of samples for laboratory analysis and dating. Current understanding of geoarchaeological deposits at the site suggests that they are of limited analytical potential, although there remains some possibility that the Langley Silt Complex may mask Palaeolithic artefacts and more sizeable ecofacts. Other areas of site require further consideration as to the necessity for geoarchaeological input into project design and execution.

#### **Land at Southall Gasworks [The Straight] Southall Ealing UB1 1QX**

- 3.4.6 A program of geoarchaeological fieldwork (Event ID: **ELO17811**) was carried out by Quaternary Scientific (University of Reading) in connection with the proposed development of land at Southall Gasworks, Southall, London Borough of Ealing. The work was commissioned and carried out on behalf of CgMs Consulting. The aim of the geoarchaeological investigations were to: (1) clarify the nature of the sub-surface stratigraphy across the site; (2) investigate whether the sequences contain any artefact or ecofact evidence for prehistoric or historic human activity, and (3) investigate whether the sequences contain any ecofact evidence with the potential for palaeoenvironmental

3.4.7 reconstruction. The results of the combined field and laboratory-based investigations have revealed a sequence of Lynch Hill Gravels overlain by thin horizons of clayey sand substantially altered by near surface processes, capped by Made Ground. No definitive Langley Silt ('brickearth') or alluvial deposits were recorded. In addition not only has previous development led to the truncation of much of the natural sequence across much of the site, but all testpits were contaminated – often severely. Thus, on the basis of the combined findings of the desk-based geoarchaeological deposit model (Green & Batchelor, 2017) and fieldwork, no further work is recommended.

#### **The Straight [Southall Gasworks] Southall Ealing UB1 1QX**

3.4.8 In August 2017 Quaternary Scientific (QUEST) were commissioned to undertake a desk-based deposit modelling exercise (Event ID: **ELO18593**). Over the past forty years at least 600 boreholes and test pits have been out down and these have formed the basis for assessment of archaeological potential. 357 boreholes or test pits penetrated the Lynch Hill Gravel and therefore recorded in full the deposits that overlie the gravel. Seven stratigraphic units could be recognized: London Clay, Lynch Hill Gravel, Sand, Silt-Clay Langley Silt, Silt-clay Alluvium, Soil, and Made Ground. The aim of this geoarchaeological investigation was to clarify the nature of sub-surface stratigraphy. It was found that in general the Langley Silt at the Gasworks site is in general thin, patchily preserved and often gravelly. At the western end of the site, the development of the Holocene floodplain of the Yeading Brook has led to the removal of the Langley Silt and its replacement by Holocene Alluvium. The Langley Silt appears to be best preserved close to the site boundary. Much of the site was occupied by 19th century brickpits, in which the Langley Silt was actively exploited and removed. The Gasworks production and storage facilities are also thought to have removed the Langley Silt.

#### **Pump Lane [Chailey Industrial Estate], Hayes, Hillingdon UB3 3NB:**

3.4.9 A programme of geoarchaeological field investigations (Event ID: **ELO20482**) was undertaken at the Chailey Industrial estate site by Quaternary Scientific (Quest) between March and November 2019 in order to clarify the nature of the subsurface stratigraphy across the site, investigate whether the sequences contained any artefact or ecofact evidence for prehistoric or historic human activity, and investigate whether the sequences contained any ecofact evidence with the potential for palaeoenvironmental reconstruction. The results of the investigations revealed a sequence of Lynch Hill Gravel (at heights between 30.10m and 28.70m OD) overlain by a thin (less than 0.65m) horizon of slightly gravelly, sandy clayey silt, interpreted as the Langley Silt but substantially altered by near

- 3.4.10** surface processes, capped by Made Ground. In three of the eight test-pits the Langley Silt had been entirely truncated during the emplacement of the overlying Made Ground, which here is between 0.2 and 0.95m thick. Thus, on the basis of the limited thickness and largely truncated nature of the Langley Silt across the site, no further work is recommended.

**College Way, [Uxbridge College], Hayes, Hillingdon**

- 3.4.11** An evaluation (Event ID: **ELO2994**) took place at Uxbridge Collage, Hayes in August 1998 by Hertfordshire Archaeological Trust. The site comprised six trial trenches which produced no archaeological finds or features.

**North Hyde Gardens, [Bull's Bridge Power Station], Hayes, Hillingdon**

- 3.4.12** A borehole survey (Event ID: **ELO9559**) was carried out at the Bull's Bridge Power Station Bridge, North Hyde Gardens between the 8th and 9th April 1998 by Oxford Archaeological Unit. Two boreholes were taken which showed natural sediments identified below made ground.

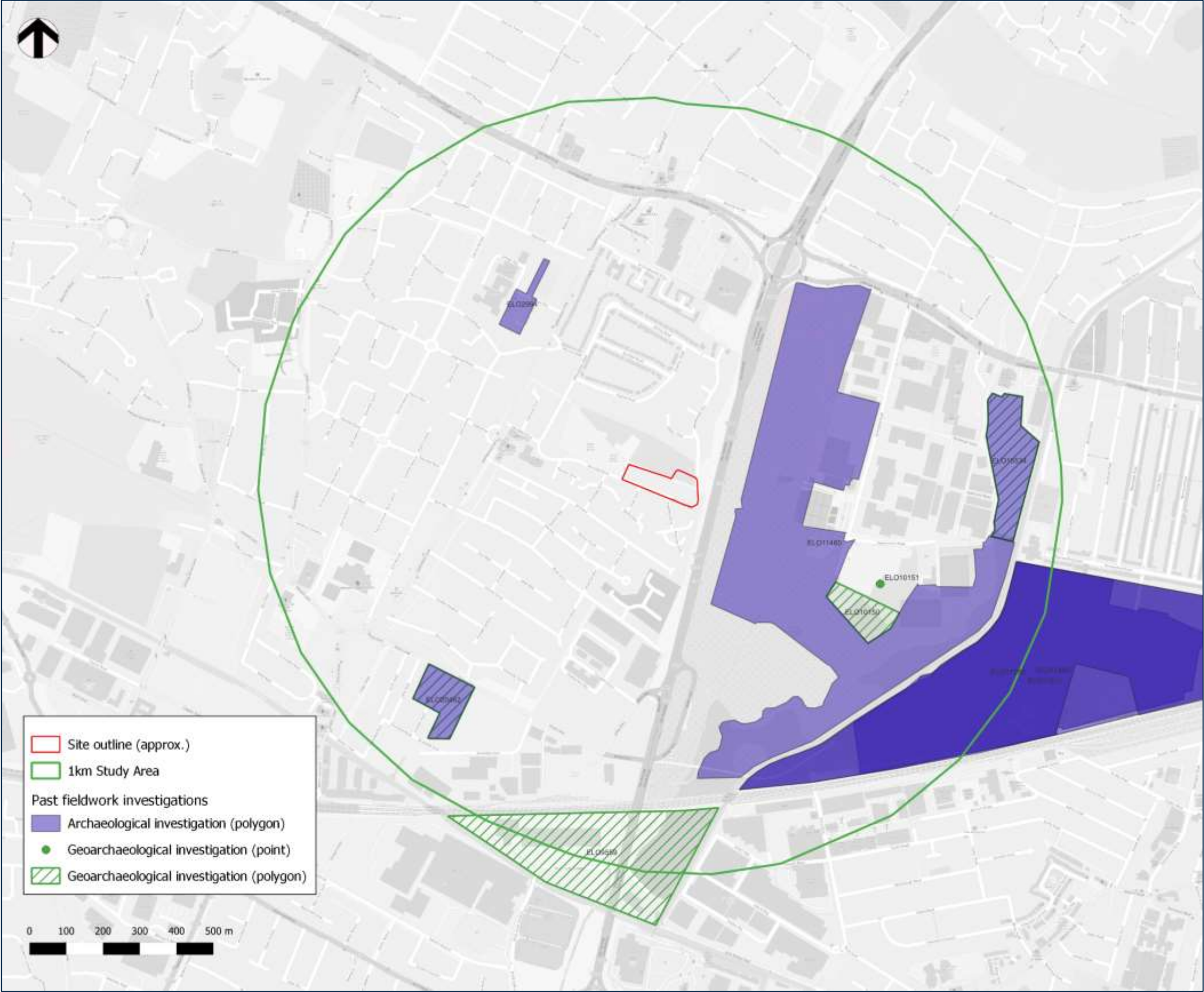


Figure 2: Archaeological interventions undertaken within 500m of the Site

### 3.5 Archaeological and historical background

#### Prehistoric period (900,000 BC–AD 43)

- 3.5.1 The Lower (800,000–250,000 BC) and Middle (250,000–40,000 BC) Palaeolithic period saw alternating warm and cold phases and intermittent (seasonal) occupation. During the Upper Palaeolithic (40,000–10,000 BC), after the last glacial maximum, and in particular after around 13,000 BC, further climate warming took place and the environment changed from steppe-tundra to birch and pine woodland. It is probably at this time that England first saw continuous occupation. Erosion has removed much of the Palaeolithic land surfaces and finds are typically residual. The topography of Hillingdon would have lent itself to a strategic settlement during the Palaeolithic period, as glacial gravel deposits gave the land an elevated plain when compared to its surroundings. The Lynch Hill Gravels underlying the Site are an acknowledged source of Palaeolithic material in West London (MoLAS 2000).
- 3.5.2 No archaeological remains of Palaeolithic date are recorded on the HER within the Site, however several are recorded in the wider study area. These include three flint hand axes (HER Ref. MLO68544) on the Provident Industrial Estate c. 850m to the southwest of the Site, and three flint hand axes (HER Ref. MLO10556) at Botwell c. 850m to the southwest of the Site. A further two Palaeolithic lithic implements were found near the Hayes Bridge brickfield (HER Ref: MLO2928). It is apparent that the bulk of these finds were retrieved in isolation, probably during gravel extraction.
- 3.5.3 The Mesolithic hunter-gather communities of the post-glacial period (10,000–4000 BC) inhabited a largely wooded environment. The river valleys and coast would have been favoured in providing a predictable source of food (from hunting and fishing) and water, as well as a means of transport and communication. No Mesolithic evidence is found within the study area, however a flint scatter (HER Ref. MLO64512) was recovered from Lake Farm, Hayes during a field-walking Survey by Tempus Reparatum in 1990. The flints included some diagnostic elements, which suggest a Mesolithic date, they consisted of small bladelet cores and a notched or truncated blade/flake. The flakes are non-diagnostic, but of appropriate size to be Mesolithic and are not typical of any other period.
- 3.5.4 The Neolithic (4000–2000 BC), Bronze Age (2000–600 BC) and Iron Age (600 BC–AD 43) are traditionally seen as the time of technological change, settled communities and the construction of communal monuments. Farming was established and forest cleared for cultivation. An expanding

population put pressure on available resources and necessitated the utilisation of previously marginal land. No archaeological remains dating to these periods have been recorded on the HER within the Site or the wider study area. However, archaeological excavations c. 1.5km to the south of the Site, adjacent to Hayes Road at the Western International Market site, identified a penannular enclosure, a gully, and multiple pits and postholes dating to the Neolithic period. The evidence shows that several phases of Neolithic occupation took place in this location, which included the possible remains of a sub-rectangular enclosure. The excavations at the Western International Market site also recorded a range of Bronze Age remains, represented by a cremation cemetery, a concentration of pits, agricultural field boundaries, and a possible large scale boundary ditch. Later Iron Age occupation of the site consisted of three circular posthole arrangements and multiple pit clusters, associated with roundhouse construction and domestic activity.

#### **Romano-British period (AD43 – AD410)**

- 3.5.5 There are no archaeological remains of Romano-British date recorded within the Site or the wider study area. The nearest recorded remains of Romano-British date consist of a number of Roman features excavated during the archaeological investigations at the Western International Market site, c. 1.5km to the south of the Site outside of the study area. These features consisted of three post-built structures, several domestic rubbish pits, and elements of a field system.

#### **Anglo-Saxon period (AD410 – AD1066)**

- 3.5.6 Hayes and its surrounding Hamlets have Anglo Saxon origins. In 821 Archbishop Wulfred received a grant for numerous areas of land in Botwell from the Mercian King, Wiglaf. The wider area of Hayes is also mentioned within this grant. The parish seem to have consisted of 5 main Anglo Saxon settlements with Hayes in the centre, Yeading to the north and Botwell to the south. Although the main church was situated in the centre of the parish, south of Uxbridge Road, there is no suggestion that the settlement grew around this building. During Middle Ages Yeading was made a sub-manor and the boundary of Hayes was somewhat reduced.
- 3.5.7 Outside of the study area, the Western International Market site excavations, c. 1.5km to the south-east of the Site identified the remains of an enclosed Anglo-Saxon settlement, consisting of a ditch enclosing at least one hall like building, multiple rectangular post-built structures and a grubenhaus.

### **Medieval period (AD1066 – AD1540)**

- 3.5.8** Hayes is mentioned in the Domesday Book where 108 people are recorded in the manor. During the medieval period, the economy was based wholly on agriculture. Many of the field names in of the surrounding area exist from the 14th century. Medieval lanes include Bag Lane (now Park Lane) and Heath Lane which are mentioned in documentary evidence in 1573. At the time of the late 16th century, the urban fabric of Hayes and its surrounding area was small scale. A survey from 1596-8 recorded Wood End as the largest Hamlet in the centre of the parish with 22 dwellings, 7 of which were cottages. In the hamlet of Botwell, there was only one notable dwelling which was an enclosed tenement cottage. A key road of London Way was mentioned in this survey and is thought to have followed the current line of Uxbridge Road. Those who owned a house within the parish numbered at 48 with the majority being located in Hayes Town.
- 3.5.9** The origins of the settlement of Hayes were noted in a desk based assessment by Tempus Reparatum in 1990. The hamlet was grouped around the mediaeval church, and may have originated in Saxon times when the Archbishop of Canterbury was given lands in the area in the 8th-9th centuries. From the early 16th century, it was often called Cotman's Town. The settlement had 12 dwellings in 1596-8AD and place-names mentioned at this time include Smet Lane, Fotes Lane, Shireway and Batford Bridge. In circa. 1700 there were 18 householders. (HER Ref. MLO68626).

### **Post-medieval and modern periods (AD1540 – present)**

- 3.5.10** The settlement in the 18th century was largely in the centre and north-west of the parish in the hamlets of Hayes End, Wood End, and Hayes. By 1796 the Grand Junction Canal ran through the south of Botwell. Open fields were reduced in 1753 which caused many of the roads to be altered. The main roads leading to Botwell were that of Botwell Lane and Church Lane with Yeading Lane continuing south over the canal. Pump Lane, which today is a primary route into Hayes Town, was a field lane. The parish's economy continued to be based on agriculture. The introduction of the canal encourage industrialisation particularly in Botwell where the docks were laid out in 1827.
- 3.5.11** The most prominent buildings as shown on the 1870s OS maps (see below) centre upon Botwell including Dawley House, Botwell Lodge, and Botwell House which is currently a primary school. The rest of the area remained largely as farmland.



Figure 3: 1860s OS map (showing approximate red line boundary)

- 3.5.12** The most notable features of this period are the amount of brickfields situated in Botwell. These fields were key to the development of Botwell and the wider area of Hayes. This local brick provided for a number of cottages built in Botwell and Yeading. The area of green space just south-east of the parish church was bounded by a number of these cottages by the mid-19<sup>th</sup> century. The Great Western Railway (G.W.R) which ran over the existing canal via a bridge was constructed a couple of years later with Hayes station opening in 1864. The site consisted of a number of warehouses and shops owned by G.W.R. Despite the railway, the urban fabric of the area remained relatively unchanged in the mid-late 19<sup>th</sup> century. With the increase in visitors a number of commercial buildings were constructed. Factories were built along Dawley Road as well as a row of terraced housing along North Hyde Road, south of site. The population was predominantly located around the centre in Yeading, Hayes End, Wood End and Botwell. At this point the site was situated on Coldharbour Farm and Cottages, north-east of Botwell, which was surrounded by empty fields. Coldharbour Lane was the principal route to Botwell and adjoined the high road (now Uxbridge Road) in the north.
- 3.5.13** In the late 19<sup>th</sup> century the majority of development continued to be centred upon Hayes Town and Wood End. The area remained predominantly agricultural with a number of farms including

Wittington's Farm and Rectory Farm ran along the High Road (now Uxbridge Road). Notable development of the late 19th century was the construction of public houses such as Victoria Inn on Cranford Lane, south of the railway line as shown on the 1890s OS map. Early signs of industrialisation occurred west of site with the construction of chemical and Hillingdon Varnish works, further south-west of site. To the east of site was another brickfield and works situated on the other side of the grand junction canal. Here, a tavern was constructed along with a number of terraced houses, probably for the brick makers.

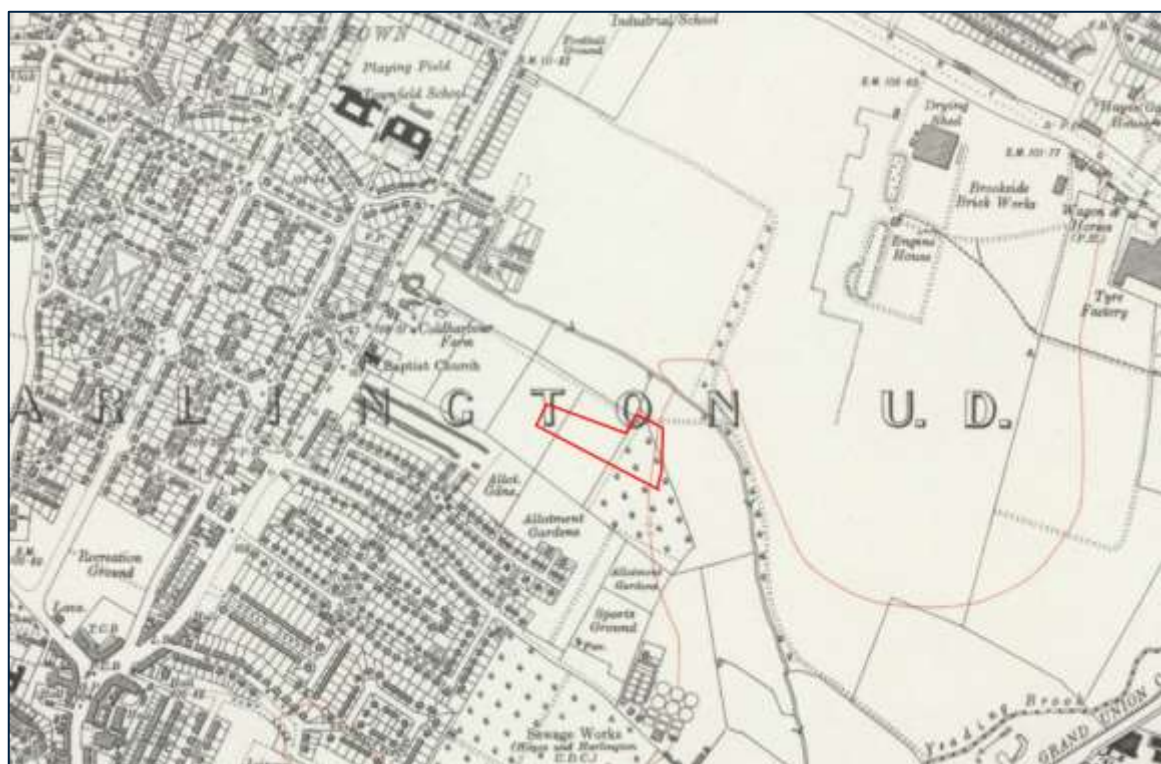


Figure 4: 1930s OS map (showing approximate red line boundary)

**3.5.14** At the turn of the 20th century the railway was improved after complaints about its services and Tramways Co. also extended its line from Southall to Uxbridge on the main road. The improvements in transport led to a dramatic increase in development in Botwell with rows of terraces being erected along the newly constructed Clayton Road and Blyth Road. A printing works was constructed in Botwell sometime in the 1910s. At the junction between the canal and railway were a number of manufacturing and industrial units such as a gramophone factory, gas works, engineering works, stone works and a sugar factory. The first school was also constructed sometime between 1900-10 which was bound by Clayton and Blyth Road. This area is now made up of Warnford and Alpha industrial estate as well as the Crown Trading Centre. To the north of site, a Jewish Boys' Industrial

School was built which specifically focused on the education of Jewish boys giving them employable skills (1910s map). By 1936 it was known as Finnart House School, and a year later the school moved to a smaller property. Brookside brick works was built between Coldharbour Farm and the Grand Union Canal as well as a tyre works. Development grew south-west from Hayes Town on the west side of Coldharbour Lane with a number of terraces and semi-detached houses being constructed Coldharbour Farm was still in use at his point in time.



Figure 5: Hunters Grove development 1928, showing approximate location of the Site

**3.5.15** 766 residential houses were constructed in Botwell by the council after the First World War Botwell was made up of residential and commercial buildings increasingly known for its modern shopping development. At the start of the Second World War, dwellings had increased by a further 500. These were located on Park Farm Estate, Cromwell Road and York Avenue. Private houses were also built to the west of Coldharbour Lane as well as the Minet Estate, just south of site. The railway bridge at Botwell was also rebuilt and enlarged in 1937. Just south-east of the Botwell was a piano factory which became a crisp and cheese factory by 1930s. Hayes Town was completely developed with terraced and semi-detached houses. Townfield School was also constructed along Coldharbour Lane.

**3.5.16** New development continued at the start of the war in the areas of Woodrow Avenue, Kingshill Avenue, and Charville Lane. Further building continued in Yeading and north Botwell.. South of site, the agricultural land of Botwell was developed into residential terraces with a cocoa factory also being constructed further south. By the 1960s this area was developed into Hayes Ward. Coldharbour Farm became the site of Minet Infant and Junior School and Brookside brickworks was abandoned. This area became an industrial estate with a number of factories constructed with adjoining allotments and sports facilities. These were constructed on the newly built Bullsbrook Road and Beaconsfield Road.

**3.5.17** After the Second World War, Hayes became an area associated with the working classes. This brought development which consisted of tight plots and terraced housing. The working classes served the industrial area of Botwell and the factories east of site in close association with the canal and railway such as the Benlow Works (HER Ref: MLO81966). The old industrial school for Jewish boys became St Christopher's School and the area of Colharbour became a separate administrative ward. Postwar development was predominantly in Yeading (1960s OS map). The site itself was developed into high rise blocks of flats in the 1970s (see later OS maps below).

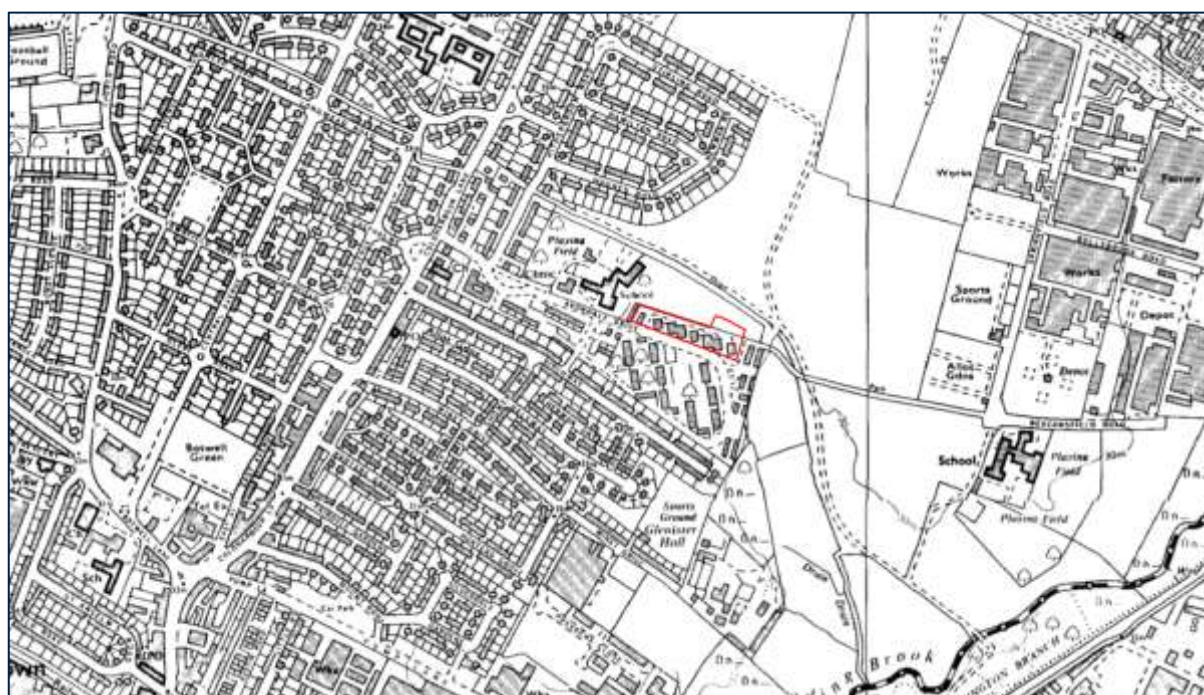


Figure 6: 1970s OS map

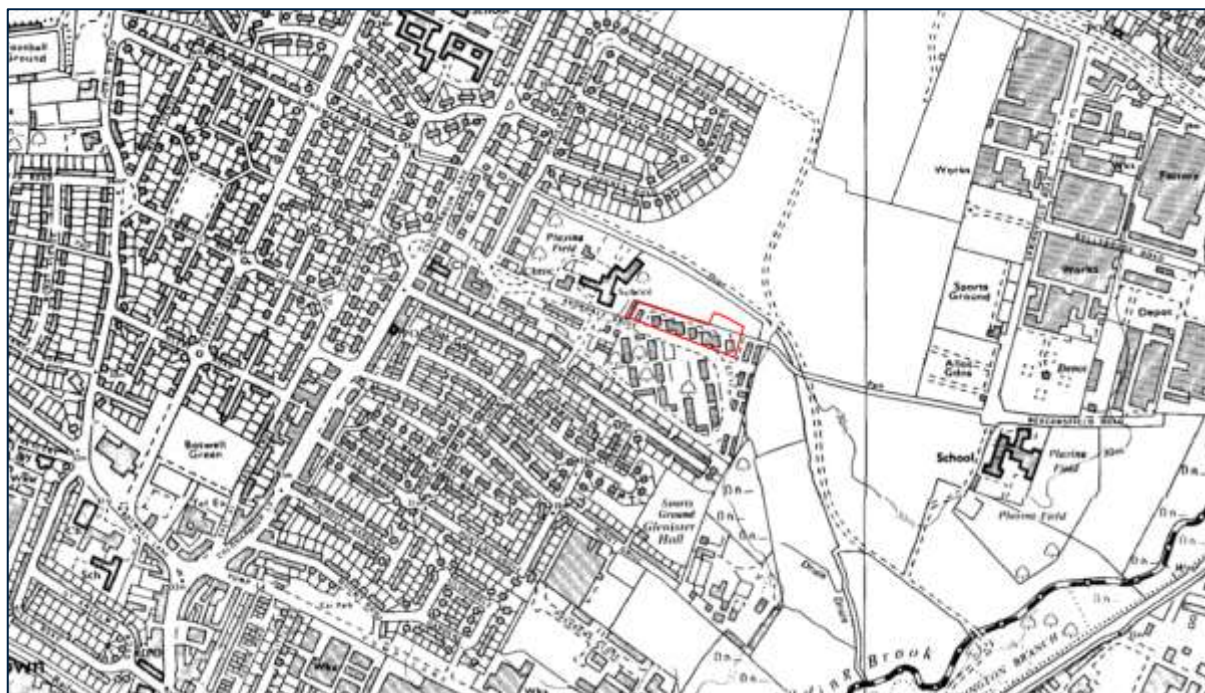


Figure 7: 1990s OS map



Figure 8: HER Monuments recorded within 1km of the Site.

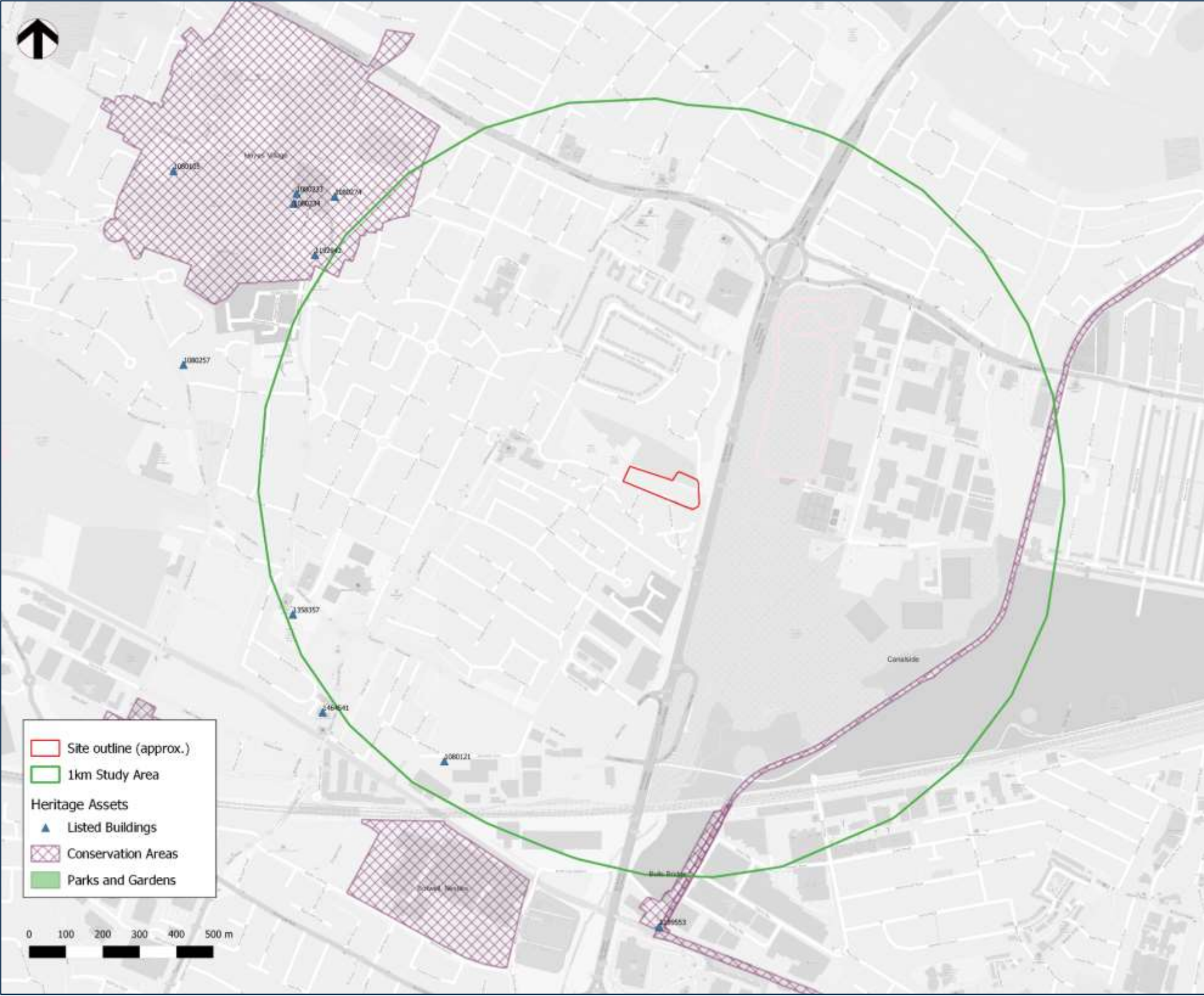


Figure 9: Designated heritage assets in the wider study area

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## 4.0 Statement of potential and significance

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### 4.1 Introduction

4.1.1 This section discusses the potential of the Site for each chronological period, based on the archaeological and historical background of the area, its geology, topography and hydrology, the likelihood for evidence of past activity, and taking into account past disturbance which may have affected survival.

4.1.2 In accordance with the NPPF, this is followed by a statement on the likely potential and significance of buried heritage assets within the site, derived from current understanding of the baseline conditions, past impacts, and professional judgement.

4.1.3 The determination of the significance of below ground non-designated heritage assets (archaeological remains) is generally based on professional judgement against its archaeological interest (as outlined in **Section 2**) rather than historic or architectural interest (however, certain archaeological remains would hold historic or architectural interest, for example structural remains).

### 4.2 Factors affecting archaeological survival

4.2.1 The Site has undergone several phases of significant development and redevelopment since the beginning of the 20<sup>th</sup> century, with the construction of high rise buildings within the Site. All of these activities will have had a destructive impact upon any below ground archaeological deposits, where present.

### 4.3 Archaeological potential and significance

4.3.1 This section discusses the potential of the Site for each chronological period, based on the archaeological and historical background of the area, its geology, topography and hydrology, the likelihood for evidence of past activity, and taking into account past disturbance which may have affected survival.

4.3.2 The potential for archaeological remains being encountered at any given site is based upon an assessment of the distribution and character of recorded local archaeological monuments (as shown

in the GLHER). Archaeological potential is measured as negligible, low, moderate or high. This section also includes professional opinion on the likely heritage significance of such remains.

#### **Prehistoric period (900,000 BC–AD 43)**

- 4.3.3 *The Site has low potential to contain prehistoric remains.* Only a handful of prehistoric finds have been recorded in the vicinity of the Site, and it is conceivable that centuries of agricultural use and development and redevelopment of the Site are likely to have removed any remains of earlier occupation, which would likely have been ephemeral. If found remains dating to this period are likely to only be chance finds and be of *low local* significance.

#### **Romano-British period (AD43 – AD410)**

- 4.3.4 *The Site has a low to negligible potential to contain Roman remains.* If present, such remains would be of *low to moderate local* significance, depending on preservation and extent, derived from their historic archaeological interest. The Site is located in a well-documented historic landscape however there is a paucity of historic environment features dating to this period in proximity to the Site, with the primary settlement in the area focused on the Roman site at Western International Market (a designated archaeological priority area) at c. 1.5km south of the site outside of the Study Area. Once again, centuries of agricultural use and development and redevelopment of the Site are likely to have removed any remains of earlier occupation.

#### **Anglo-Saxon period (AD410 – AD1066)**

- 4.3.5 *The Site has low potential to contain Anglo-Saxon remains.* Although Anglo-Saxon settlement is known to have been present within the wider study area, the Site is likely to have lain in the agricultural hinterland of any settlement during this period. If present, such remains would be of *low to moderate local* significance, depending on nature, preservation and extent, derived from their archaeological and historical interest.

#### **Medieval period (AD1066 – AD1540)**

- 4.3.6 *The Site has low potential to contain medieval remains.* Although medieval settlement is known to have been present within the wider study area, the Site is likely to have lain in the agricultural

hinterland of any settlement during this period. If present, such remains would be of low to *moderate local* significance, depending on nature, preservation and extent, derived from their archaeological and historical interest.

#### **Post-medieval and modern periods (AD1540 – present)**

- 4.3.7 *The Site has low potential to contain post-medieval remains and a high potential for modern remains.*
- The Site appears to have lain within the agricultural hinterland of the post-medieval settlement surrounding the Site. The GLHER does note several undated ditches in the vicinity of the site, however these are most likely to be associated with the 19<sup>th</sup>-20<sup>th</sup> century agricultural use of the area. There has been significant development and redevelopment on the Site in the 20<sup>th</sup> century which is likely to have removed any earlier remains. There is however a high potential for the Site to contain remains of the early 20<sup>th</sup> century housing development on the Site, depending on the extent of later truncation of the Site during demolition and redevelopment works in the 1970's. If present, remains dating to the post-medieval and modern periods would be of *low to negligible local* significance.

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## 5.0 Impact assessment

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### 5.1 Introduction

5.1.1 This section assesses the likelihood for the project to have an impact on the significance of buried heritage assets. Such impacts include anything that would cause ground disturbance, such as preliminary ground works, removal of made ground, landscaping and planting

5.1.2 It is outside the scope of this archaeological report to consider the impact of the proposed development on above ground assets (eg. physical impacts which would remove or change building fabric, or changes to the historic character and setting of designated above ground heritage assets within the Site or outside of it). These built heritage considerations are comprehensively assessed in the accompanying Heritage and Townscape Visual Impact Assessment (Savills 2021).

### 5.2 Outline of the proposals relevant to the assessment

5.2.1 This report accompanies a full set of architectural drawings which should be consulted in conjunction with the following section. For a full description of the proposed development the reader is referred to the Design and Access Statement (DAS) and the plans submitted as part of this planning application.

#### Preliminary site works

5.2.2 Such works would include those carried out as part of the initial site set up, including demolition and preliminary site stripping for the proposed landscaping and removal of hardstanding. It is assumed for the purposes of this assessment to cause ground disturbance to a maximum depth of 1.0mbgl.

#### Piled foundations

5.2.3 Historic England's advice on piling and archaeology is covered in a Guidance and Good Practice guide (HE 2019b). Any archaeological remains within the footprint of each pile would be removed as the pile is driven downwards. The severity of the impact would therefore depend on the pile size, type and pile density. Where the piling layout is particularly dense, it is in effect likely to make any surviving archaeological remains, potentially preserved between each pile, inaccessible in terms of any archaeological investigation in the future.

5.2.4 The exact specification of foundation type is not currently known. Augered piles/continuous flight auger (CFA) piles would minimise the impact upon possible archaeological remains, whereas vibro-compacted piles may cause additional impact through vibration and deformation of fragile surrounding remains, in particular at the level of the water table. The insertion of pile caps and connecting ground beams, along with the excavation of a pile guide trench, typically extend no more than 1.0–1.5mbgl and would remove any archaeological or geo-archaeological remains within the footprint of these works to this depth.

### **5.3 Archaeological impact**

5.3.1 The results of research from data held at the GLHER, as well as cartographic and archive sources, suggests that the Site has a low to negligible potential for encountering archaeological remains of Romano-British and post-medieval date, a low potential for remains of prehistoric, Anglo-Saxon, and medieval date, and a high potential for remains of modern date (which, if present, any remains would generally likely be of low to negligible local significance).

5.3.2 The Site has undergone several phases of significant development and redevelopment since the beginning of the 20<sup>th</sup> century, with a major phase of demolition and subsequent reconstruction of buildings within the Site in the 1970s. All of these activities will have had a destructive impact upon any below ground archaeological deposits, where present. It is therefore unlikely further archaeological investigation would be justified on the Site, which has been previously developed and is not located within an Archaeological Priority Area. The final decision for any further archaeological work on the site rests with the LPAs Archaeological Advisor, the Greater London Archaeological Advisors Service (GLAAS).

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## 6.0 Conclusion and recommendations

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### 6.1 Conclusion

- 6.1.1 Savills Heritage and Townscape have been appointed by London Borough of Hillingdon to prepare an Archaeological Desk-Based Assessment (ADBA) to assess the archaeological constraints in relation to proposed re-development of the site at Avondale Drive, Hayes, London Borough of Hillingdon.
- 6.1.2 This report comprises a full archaeological appraisal in relation to the Site based upon the GLHER data, previous archaeological investigations in the vicinity of the Site and the known historic development of the area.
- 6.1.3 The results of research from data held at the GLHER, as well as cartographic and archive sources, suggests that the Site has a low to negligible potential for encountering archaeological remains of Romano-British and post-medieval date, a low potential for remains of prehistoric, Anglo-Saxon, and medieval date, and a high potential for remains of modern date. If present, any remains would generally likely be of low to moderate local significance.
- 6.1.4 The Site has undergone several phases of significant development and redevelopment since the beginning of the 20<sup>th</sup> century, with a major phase of construction of buildings within the Site in the 1970's. All of these activities will have had a destructive impact upon any below ground archaeological deposits, where present.
- 6.1.5 It is unlikely that any archaeological remains (below ground non-designated heritage assets) on the Site would be equivalent to the significance of a scheduled monument (see **Section 2.4**) and therefore would be of lesser significance. However, the implementation of archaeological mitigation measures may be required in order to ensure that any hitherto-unknown archaeological remains are preserved and recorded appropriately.

### 6.2 Recommendations

- 6.2.1 Any groundworks associated with construction at the proposed development site will impact on below-ground archaeological remains (non-designated heritage assets) where present. The below ground

potential of the Site is well understood and any below ground heritage assets are not expected to preclude development on the Site.

6.2.2 In light of the assessment that the site is unlikely to yield remains of significance, it is proposed no further archaeological fieldwork is required on the Site in relation to the scheme. However, the decision for any further archaeological work, or not, rests with the Local Planning Authority's Archaeological Advisor (the Greater London Archaeological Advisory Service, GLAAS).

6.2.3 Should any archaeological fieldwork mitigation be deemed necessary this could be carried out under the terms of a standard archaeological planning condition set out under the granting of planning consent. Any archaeological works would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and all archaeological fieldwork would be monitored by the LPA's archaeological advisor to ensure that the works comply with the agreed WSI.

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## 7.0 References

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### 7.1 Documentary sources

*ClfA (Chartered Institute for Archaeologists) Dec 2014a, Standards and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment, Reading.*

*ClfA (Chartered Institute for Archaeologists) Dec 2014b, Standards and guidance for historic environment desk-based assessment, Reading*

*ClfA (Chartered Institute for Archaeologists) Dec 2014c, Standards and guidance for the archaeological investigation and recording of standing buildings or structures, Reading*

*Historic England (Greater London Archaeological Advisory Service), 2015, Guidelines for Archaeological Projects in Greater London*

*Historic England, 2019a, Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets*

*Historic England, 2019b, Piling and Archaeology: Guidance and Good Practice*

*MHCLG, 2019a, (Ministry of Housing, Communities and Local Government), July 2021 National Planning Policy Framework*

*MHCLG, 2019b, (Ministry of Housing, Communities and Local Government), July 2019 Conserving and Enhancing the Historic Environment: Planning Practice Guide*

*Museum of London Archaeological Service (MOLAS), 2000, The archaeology of Greater London An assessment of archaeological evidence for human presence in the area now covered by Greater London*

*Savills, 2021, Avondale Drive, Hayes, London Borough Of Hillingdon Heritage, Townscape and Visual Impact Assessment and Tall Building Assessment*

### 7.2 Cartographic sources

*Ordnance Survey mapping 1870, 1890, 1930, 1930, 1960, 1970 - 2021*

*2021 Aerial photography (source: Google, Bing, Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community)*

### 7.3 Online and other sources

*Greater London Historic Environment Record (GLHER)*

*british-history.ac.uk*

*<https://historicengland.org.uk>*

<https://www.pastscape.org.uk/>

<https://www.heritagegateway.org.uk/gateway/>

<https://www.thegenealogist.co.uk>

<https://maps.nls.uk>

<https://www.britainfromabove.org.uk/>

## 9.0 Appendix 1: Gazetteer of historic environment features

### 9.1 Greater London Historic Environment Record

9.1.1 The table below represents a gazetteer of known historic environment sites and finds within the study area. Compiled from information within the GLHER. The gazetteer should be read in conjunction with the historic environment features on the accompanying figure.

Table 2: Identified historic environment Events within the study area

| HER identifier | Address                                                                                               | Description                |
|----------------|-------------------------------------------------------------------------------------------------------|----------------------------|
| ELO10099       | Beaconsfield Road [Guru Nanak VA Schools], Hayes, UB4: Archaeological Impact Assessment               | Desk based assessment      |
| ELO10150       | Beaconsfield Road [Guru Nanak VA Schools], Hayes, UB4: Archaeological Impact Assessment               | Borehole survey            |
| ELO11460       | Harefield to Southall [gas pipeline]: Excavation and Watching Brief                                   | Excavation; watching brief |
| ELO15531       | Uxbridge Road (Nos 1-3), Hayes, Hillingdon, UB4: Archaeological Desk Based Assessment                 | Desk based assessment      |
| ELO15534       | Uxbridge Road (Nos 1-3), Hayes, Hillingdon, UB4: Environmental Assessment                             | Test pit                   |
| ELO2994        | College Way, [Uxbridge College], Hayes, Hillingdon: Evaluation                                        | Trial trench               |
| ELO9559        | North Hyde Gardens, [Bull's Bridge Power Station], Hayes, Hillingdon: Geoarchaeological Investigation | Borehole survey            |
| ELO17811       | Land at Southall Gasworks [The Straight] Southall Ealing UB1 1QX: Geoarchaeological Fieldwork Report  | Evaluation                 |
| ELO17250       | Southall Gasworks [The Straight] Southall Ealing UB1 1QX: Geo-Archaeological Mitigation               | Excavation                 |
| ELO18593       | The Straight [Southall Gasworks] Southall Ealing UB1 1QX: Geoarchaeological Deposit Model             | Desk based assessment      |
| ELO19129       | Pump Lane [Chailey Industrial Estate] Hillingdon Greater London UB3 3NB: Desk Based Assessment        | Desk based assessment      |
| ELO20482       | Pump Lane [Chailey Industrial Estate], Hayes, Hillingdon UB3 3NB: Geoarchaeological Fieldwork         | Test pit                   |
| ELO10151       | Beaconsfield Road [Guru Nanak VA Schools], Hayes, UB4: Archaeological Impact Assessment               | Borehole survey            |
| ELO14907       | Harefield to Southall Natural Gas Pipeline, Hillingdon and Ealing: analysis and archive report        | Analysis                   |

Table 3: Historic environment Monuments within the study area

| HER identifier | Address                     | Period      | Description                           |
|----------------|-----------------------------|-------------|---------------------------------------|
| MLO1756        | 8 Westley Rd                | Prehistoric | Scraper (Tool) (Prehistoric)          |
| MLO2928        | Hayes Bridgebrickfield Near | Prehistoric | Lithic Implement (Palaeolithic)       |
| MLO2928        | Hayes Bridgebrickfield Near | Prehistoric | Lithic Implement (Palaeolithic)       |
| MLO68544       | Provident Industrial Estate | Prehistoric | Lithic Implement (Palaeolithic)       |
| MLO10556       | Botwell                     | Prehistoric | Lithic Implement (Lower Palaeolithic) |

|          |                                            |                    |                                                                                                                           |
|----------|--------------------------------------------|--------------------|---------------------------------------------------------------------------------------------------------------------------|
| MLO68626 | Church Road/Hemmen Lane, Hayes, Hillingdon | Medieval to Modern | The origins of the settlement of Hayes were noted in a desk based assessment by Tempus Reparatum in 1990.                 |
| MLO74485 | Austin Rd                                  | Post Medieval      | Brickfield                                                                                                                |
| MLO74488 | Austin Rd                                  | Post Medieval      | Well; Well                                                                                                                |
| MLO74489 | Austin Rd                                  | Post Medieval      | Mill                                                                                                                      |
| MLO74490 | Austin Rd                                  | Post Medieval      | Dock                                                                                                                      |
| MLO81966 | Benlow Works                               | Modern             | Record created from imported Listed Buildings On-line dataset 11-Jan-2006; see linked Designation record for full details |
| MLO72604 | Minet Country Park                         | Modern             | A 20th century landfill site was located between Avondale Drive and Springfield Road with the Uxbridge Road to the north. |
| MLO3220  | Coldharbour La (Between )                  | Unknown            | Ditch                                                                                                                     |
| MLO3223  | Beaconsfield Rd (North Of )                | Unknown            | Ditch                                                                                                                     |
| MLO3224  | Beaconsfield Rd (North Of )                | Unknown            | Enclosure                                                                                                                 |
| MLO72105 | Hayes By-Pass                              | Unknown            | Flood Deposit                                                                                                             |
| MLO72106 | Hayes By-Pass                              | Unknown            | Land Surface                                                                                                              |
| MLO3219  | Avondale Drive [Minet Country Park]        | Unknown            | Linear ditches of a unknown date were identified by aerial photography in the southern part of Minet Country Park.        |
| MLO1756  | 8 Westley Rd                               | Prehistoric        | Scraper (Tool) (Prehistoric)                                                                                              |
| MLO2928  | Hayes Bridgebrickfield Near                | Prehistoric        | Lithic Implement (Palaeolithic)                                                                                           |
| MLO2928  | Hayes Bridgebrickfield Near                | Prehistoric        | Lithic Implement (Palaeolithic)                                                                                           |

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## 10.0 Appendix 2: Planning policy and guidance

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### 10.1 National Planning Policy Framework

10.1.1 National planning policies on the conservation and enhancement of the historic environment are set out in the National Planning Policy Framework (NPPF, July 2021). Section 16, 'Conserving and Enhancing the Historic Environment' specifically deals with historic environment policy and includes the following policy text relevant to the proposals:

***Proposals affecting heritage assets***

**Para 189.** *Heritage assets 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 (footnote: Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance). These assets are an irreplaceable resource, and 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 (Footnote: The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making).*

**Para 190.** *Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.*

**Para 191.** *Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:*

- a) assess the significance of heritage assets and the contribution they make to their environment; and*

- b) *predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.*

**Para 192.** *Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.*

**Para 194.** *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.*

**Para 195.** *Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

**Para 196.** *Where there is evidence of deliberate neglect of, or damage to, a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.*

**Para 197.** *In determining applications, local planning authorities should take account of:*

*the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

*the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

*the desirability of new development making a positive contribution to local character and distinctiveness.*

#### **Considering potential impacts**

**Para 199.** *When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

**Para 200.** *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

*grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

*assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and grade II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. (footnote: Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets).*

**Para 201.** *Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

*the nature of the heritage asset prevents all reasonable uses of the site; and*

*no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

*conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*

*the harm or loss is outweighed by the benefit of bringing the site back into use.*

**Para 202.** *Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

**Para 203.** *The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

**Para 205.** *Local planning authorities should require developers 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, and to make this evidence (and any archive generated) publicly accessible (footnote: Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository). However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.*

## **10.2 Greater London Regional Policy**

## **10.3 The London Plan (March, 2021)**

**10.3.1** The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.

**10.3.2** The Plan is part of the statutory development plan for London, meaning that the policies in the Plan

should inform decisions on planning applications across the capital. Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.

**10.3.3 Section 7** of the London Plan sets out policies for Heritage (and Culture). Policy HC1 Heritage conservation and growth states:

- C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*
- D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.*

**10.4 The London Borough of Hillingdon local policy**

**10.4.1** The Site is located in the London Borough of Hillingdon, which is one of 32 London boroughs. The Hillingdon Local Plan 2012 sets out the vision, strategic objectives and policies for development in Hillingdon over 15 years. The policies relevant to heritage are reproduced in full below:

**10.4.2** Strategic Objectives: SO1: Conserve and enhance the borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration. Related Policy: HE1

***Policy HE1 Heritage***

The Council will:

1. Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes:

*Historic village cores, Metro-land suburbs, planned residential estates and 19<sup>th</sup> and 20<sup>th</sup> century industrial areas, including the Grand Union Canal and its features;*

*Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments;*

*Registered Parks and Gardens and historic landscapes, both natural and designed;*

*Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and*

*Archaeologically significant areas, including Archaeological Priority Zones and Areas.*

2. Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.

3. Promote increased public awareness, understanding of and access to the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.

4. Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset

**10.4.3** The Local Plan Part 1 'Strategic Objective SO1' and 'Policy HE1: Heritage' aim to conserve and enhance Hillingdon's distinct and varied environment, as well as its setting and the wider historic landscape.

**10.4.4** Hillingdon's further supplementary 'Local Plan: Part 2 Development Management Policies' (Adopted January 2020) also include policies pertinent to heritage assets and the current proposals. Relevant paragraphs are reproduced below along with commentary in relation to the proposals:

**Policy DMHB 1: Heritage Assets**

**A)** *The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:*

- i) it sustains and enhances the significance of the heritage assets and puts them into viable uses consistent with their conservation;*
- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;*
- iii) it makes a positive contribution to the local character and distinctiveness of the area;*
- iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;*
- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;*
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and*
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.*

**10.4.5** This report has been produced within the context and requirements of relevant national and local planning policy and guidance, including the NPPF, local planning policy, CIFA and Historic England guidance.

## 11.0 Appendix 3: Site photographs



*Figure 10: Looking west along Avondale Drive*



*Figure 11: Looking east along Abbotswood Way*



*Figure 12: Aerial photograph of the site (looking south) showing areas of existing development*



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