

Archaeological Response Letter: Land at HPH2, HPH5, and Multistorey Car Park Hyde Park Hayes, Millington Road, Hayes, UB3 4AZ

Introduction

1. This Archaeological Response Letter addresses the consultee response (ref. 234269, dated 15th September 2025) that has been issued by the Greater London Archaeological Advisory Service (GLAAS) in respect of the proposed development of Land at HPH2, HPH5, and Multistorey Car Park Hyde Park Hayes, Millington Road, Hayes, UB3 4AZ, henceforth referred to as the 'Site'.
2. An application for planning permission (ref. 79625/APP/2025/2128) has been submitted to the London Borough of Hillingdon. The proposed development comprises:
Outline planning permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and phased delivery of residential development (Class C3), flexible residential / commercial floorspace, new public realm, landscaping, play space, car parking, cycle parking and associated works.
3. In summary, the GLAAS consultee response requests the undertaking of specialist assessment to clarify the potential of the Site to contain archaeological evidence of early Prehistoric (Palaeolithic) date. The GLAAS response further specifies that the scope of any such further assessment is to be agreed in advance and will inform the need/scope of on-Site investigation.
4. The Site and the area within which it lies has been subject to detailed archaeological assessment, commissioned by and adopted by GLAAS, to inform the delineation of archaeological priority areas across the Borough of Hillingdon. This 2013 study and the resulting recommendations of GLAAS, determined that the archaeological potential of the area was low, including for early prehistoric evidence. It is as a result of this recognised low potential that the Site does not lie within an archaeological priority area.
5. GLAAS has not previously prioritised geoarchaeological assessment or investigation locally within a 750m radius of the Site. GLAAS has not previously required any geoarchaeological assessment or pre-determination archaeological investigation for any past development within the Site or its immediate vicinity.
6. The submitted Archaeological Desk Based Assessment (RPS, June 2025), together with this Archaeological Response Letter, are regarded fully sufficient to inform a decision on the suitability of the proposals in respect of Archaeological matters. With consideration of the points raised by GLAAS, the base line conclusions remain a fair and valid assessment.
7. The conclusions and recommendations of the submitted Archaeological Desk Based Assessment are considered to be valid, and further archaeological work, including on-site investigation, is considered to be unnecessary. These recommendations accord with GLAAS's own previous advice issued in respect of the re-development of parts of the Site and its immediate vicinity.

Discussion

8. The GLAAS response to application ref. 79625/APP/2025/2128 identifies a 'concern' with the conclusion of the submitted archaeological desk-based assessment in regard to the identified potential for the presence of Palaeolithic archaeological evidence.
9. The GLAAS consultee response highlights that the submitted Archaeological Desk Based Assessment does not discuss 'key sources' for understanding the archaeological potential of the area for early prehistoric evidence. These specified sources include *London before London: Reconstructing a Palaeolithic Landscape* (C. Juby, 2011) and *The Lower Palaeolithic Occupation of Britain* (The English Rivers Project, 1999). These sources both comprise landscape wide assessments, within which the

archaeological potential of the geological deposits assessed by them is not uniform. It should be noted that the early Prehistoric archaeological evidence discussed by these sources is, relatively speaking, rare, representing the physical evidence of very small, nomadic populations occupying different areas of the landscape on a seasonal basis. There are, additionally, many factors in the archaeological potential of a particular Site, and the degree of potential impact not least the extent of past below ground disturbance and the extent and depth of any undisturbed stratigraphy. Both of the works referenced by GLAAS pre-date, and so will have informed, the 2013 in-depth review of archaeological priority areas in the Borough of Hillingdon, commissioned by and overseen by GLAAS. This expansive 2013 study determined the area within which the Site lies did not hold sufficient archaeological potential to warrant the demarcation of an archaeological priority area. Importantly, this study will nevertheless have informed the approach taken by GLAAS in determining the scope of archaeological investigations required within the Study Area in support of development proposals. All past archaeological investigation within the Study Area discussed in the submitted Archaeological Desk Based Assessment will have been carried out to a specification set by GLAAS and subject to subsequent review and sign off by that body. No geoarchaeological specific investigations have previously been required by GLAAS within the Study Area.

10. Notwithstanding the clear, long standing, low priority given by GLAAS to geoarchaeological investigation locally, there are only four records of Palaeolithic archaeological evidence within the Study Area. None of these widely disbursed records lies closer than 200m from the Site. In the context of the various standard archaeological investigations and monitoring exercises that have been carried out within the Study Area, it remains that this is an extremely low density of finds.
11. In responding to previous development proposals directly within the Site and the immediate vicinity, GLAAS has consistently specified either that no archaeological work is required or that archaeological matters could be addressed through a standard wording archaeological planning condition (Table 1).

Table 1: Previous GLAAS/Condition Responses		
<u>Planning Reference</u>	<u>Proposal</u>	<u>GLAAS Response</u>
45753/APP/2012/2029: HPH 5 MILLINGTON ROAD HAYES Included within Site.	Erection of five storey building to provide 13,880sq.m of Class B1(a) Office floorspace, provision of car parking spaces at surface and basement level, associated landscaping and ancillary works.	No archaeological conditions attached to decision. Officer's report states that archaeological impacts are " Not applicable as site is not located in or within close proximity of a conservation area, area of special local character or area of archaeological interest. "
76655/APP/2021/3039: HPH4 MILLINGTON ROAD HAYES To immediate west of Site.	Re-development of the vacant Site to provide a residential development comprising 131 (C3) residential units, with associated amenity areas, and scaping, car parking and all ancillary and enabling works.	Officer's report states: " <i>The Greater London Archaeological Advisory Service (GLAAS) have been consulted as part of the application process and have confirmed that there is no archaeological interest on the site which would warrant further investigation of the site.</i> "
27189/APP/2021/2782: Keith House North Hyde Road Hayes. To immediate northwest of the Site.	Demolition of existing buildings and construction of a new 8FE school including public library, Sixth form classrooms, new NP/ASD/SRP department, adult education classrooms, outdoor and indoor sport and recreation facilities, and associated	Officer's report states that: <i>The Greater London Archaeological Advisory Service (GLAAS) have been consulted as part of the application</i>

	landscaping and refuse stores/collection points	<i>process. Although the application site does not lie within an Archaeological Priority Area or Zone it may have some archaeological interest. Accordingly, GLAAS have advised that the development could cause harm to archaeological remains and a field evaluation is needed to determine appropriate mitigation. A two-stage condition is therefore recommended to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation</i>
32157/APP/2016/1696 UNIT 3 MILLINGTON ROAD HAYES To the immediate east of the Site.	Erection of 3281sq.m GEA industrial/warehouse unit (Use Classes B1c, B2, B8) and erection of 1327sq.m GEA coach maintenance/servicing unit and depot (Sui Generis); together with alterations to adjacent highway accesses, creation of associated service and customer yards, car parking and landscaping.	No archaeological conditions attached to Decision. Officer's report states that in respect of archaeological impacts: <i>The site is not located within a Conservation Area, Area of Special Local Character or Archaeological Priority Area, and there are no Listed Buildings on the site. As such, it is considered that the scheme would not impact on the heritage of the borough.</i>

12. The Site has been subject to severe, cumulative below ground impacts. A review has been carried out of the various geotechnical borehole and test pit investigations undertaken within the Site (*Geo-Environmental Report* (Enzygo, 2016); *Jacobs Groundwater Detailed Quantitative Risk Assessment (DQRA)*, Hyde Park, Hayes, HPH5 (August 2015); and *Summary of Works Undertaken to Achieve Discharge of Planning Conditions at HPH5*, Ramboll Environ, 2016). The results of these investigations reflect the severe and cumulative effects of past and existing phases of development within the Site, with made ground extending to a depth of 2.5m below ground level in places, with an average depth of 1.5m below ground level. The extent of disturbance of natural geology is reflected in the very widely varying depths at which Langley Silt and Lynch Hill Gravels were encountered, ranging from 0.3m to 1.5m and 0.9m to 7.0m below ground level respectively. It is evident that the natural geology within which any early prehistoric evidence would be located has been either truncated in whole or in part by previous development or lies at such a depth as to have no potential to be affected by the proposed development.
13. Details of foundation structures across the Site could be specified by appropriate planning conditions to avoid or minimise potential impacts to remaining natural geological strata within the Site. This measure stands in addition to the demonstrable low potential of the Site to contain any form of archaeological evidence and the previous position of GLAAS, whereby the Site, and the vicinity has been determined to hold no or very limited archaeological potential. Therefore, either no further work or the application of standard wording archaeological planning conditions has applied.

Conclusions

14. The Site lies within an area of demonstrably low potential for any form of pre-modern archaeological evidence. Substantial in-depth studies have been utilised by, or commissioned by, GLAAS to inform the demarcation of archaeological priority areas in the Borough of Hillingdon and no such area has been designated within a 750m radius of the Site.
15. A very low density of early Prehistoric archaeological evidence has been recorded within the Study Area, comprising four records, of which none lie closer than 200m of the Site.
16. The low archaeological potential of the Site and its immediate vicinity has been previously recognised by GLAAS as either not meriting archaeological investigation or requiring only the undertaking of standard archaeological measures secured by planning conditions.
17. The Site has been subject to severe and cumulative below ground impacts that have left only small pockets of geology suitable for the presence of early prehistoric evidence at a depth that may be affected by the development proposals. In the context of the extremely low potential for the presence of any archaeological evidence within these deposits, the undertaking of further assessment or investigation is considered to be disproportionate and contradictory to the responses of GLAAS to other planning applications within the Site and its immediate surrounds.
18. With consideration of the points raised by GLAAS, the conclusions and recommendations of the submitted Archaeological Desk Based Assessment remain fair and valid. Therefore, no further archaeological work, including on-site investigation, is considered to be necessary. These recommendations accord with GLAAS's own previous advice issued in respect of the re-development of parts of the Site and its immediate vicinity.