

13. Archaeology and Cultural Heritage

13.1 Introduction

- 13.1.1 This Chapter, which has been prepared by Waterman, provides a statement of conformity with regard to the potential archaeological and cultural heritage impacts arising from the Scheme with Phase 1B (North) in place (and having regard also to the detailed design previously approved in relation to Phase 1A (North)). This statement of conformity is provided pursuant to the s73 ES and other EIA Documentation (as defined in **Chapter 4: Approach to the ES Further Information Report**) in light of further detailed design information now being available in respect of Phase 1B (North). It sets out where the previous assessment remains valid, and where detailed design information allows the significance of environmental impacts already identified to be refined. Archaeological reports (Outline and Site-Specific Written Schemes of Investigation) prepared to partially discharge Planning Condition 43.1 of the 2014 Permission are also considered in this Chapter.
- 13.1.2 A review of relevant policy, legislation and guidance published since the s73 ES and other EIA Documentation was prepared has been carried out, and confirmation provided as to whether any changes have any material implications for the assessment previously presented. A review of the detailed design, as defined in **Chapter 2: Description of Phase 1B (North) RMA**, has then been undertaken, to identify those features and elements of the Phase 1B (North) RMA of relevance to the archaeological and cultural heritage assessment.
- 13.1.3 The approach to the assessment methodology is set out, including relevant significance criteria expanded from the s73 ES to include a grading of significance / value of heritage assets, a grading of the potential magnitude of impact the proposed Development would have on these assets or groups of assets, and a grading of the significance of the effect from the proposed Development on heritage. This grading formed the basis of the assessment in the Phase 1A (North) FIR and is required in order to enable a quantitative assessment of both the heritage resource and the impacts from the Development. To this end, reference is made throughout this Chapter to the Phase 1A (North) FIR which updated the assessment provided in the s73 ES.
- 13.1.4 The approach outlined above remains valid for the Phase 1B (North) FIR. However, the assessment criteria have been subject to some adjustments in terminology from those presented in the Phase 1A (North) FIR, and as such the updated criteria are set out in this chapter. These adjustments to terminology have not affected the assessment outcomes.
- 13.1.5 A review of the baseline information presented in the s73 ES and the other EIA Documentation has been undertaken and it has been confirmed that there are no significant changes to the baseline previously presented within the existing EIA Documentation. Commentary is then provided which confirms whether any new or different potential impacts arising from the Development (comprising the Scheme with the detailed design for both Phase 1A (North) and Phase 1B (North) in place) from those identified previously are likely. Likewise, any new or different mitigation measures from those identified previously are presented where considered necessary, and residual impacts following the application of mitigation are described.

- 13.1.6 This Chapter is supported by: **Appendix 13.1: Phase 1B (North) Site-specific Scheme of Archaeological Investigation.**

13.2 Policy, Legislation and Guidance

- 13.2.1 There have been no significant changes to policy, legislation or guidance, since the s73 ES and other EIA Documentation were prepared, which have a significant effect on the approach to or findings of the archaeology and cultural heritage assessment.

13.3 Relevant Phase 1B (North) RMA Details

- 13.3.1 All elements of the Phase 1B (North) RMA, as described in **Chapter 2**, which will involve excavation of existing ground levels are of relevance to the assessment of archaeology and cultural heritage. These elements were assessed as part of the assessment of the Scheme in outline in the s73 ES, and further assessed in the other EIA Documentation, however further consideration is given within this Chapter to the potential impacts on archaeology and cultural heritage now that the detailed design proposals for Phase 1B (North) are known.
- 13.3.2 A description of some of the ground works associated with each element of the Phase 1B (North) RMA is provided in **Chapter 15: Ground Conditions**. It is important to note however that this information has not changed significantly since the s73 ES and other EIA Documentation were submitted, although further details are now available following detailed design which allows impacts to be refined.
- 13.3.3 Potential sources of impacts could arise from all construction elements of the Phase 1B (North) RMA which include:
- Demolition or refurbishment works to existing buildings;
 - Topsoil and subsoil stripping;
 - Bulk excavation;
 - Excavation for foundations, sewers, drains and utilities;
 - Landscaping and tree planting;
 - Changes to ground water regimes; and
 - The removal of historic semi-natural landscape features.

13.4 Assessment Methodology

- 13.4.1 There have been no significant changes to planning policy, legislation or guidance since the s73 ES and other EIA Documentation were published, which materially affect the approach to the archaeology or cultural heritage assessment.
- 13.4.2 In preparing this Chapter, Waterman has undertaken a full review of the s73 ES and other EIA Documentation, including the methodology and significance criteria presented previously. Information gathered during the site visit previously undertaken in May 2014, accompanied by Sandy Kidd (Principal Consultant, Greater London Archaeological Advisory Service (GLAAS), advisors to the London Borough of Barnet (LBB) in matters related to archaeology in planning) remains relevant to this phase of the Scheme, given that there have been no significant changes to site conditions since that date.

- 13.4.3 Baseline data was updated to inform the preparation of the Phase 1A (North) FIR. The updated baseline as presented in the existing EIA Documentation is considered to remain accurate and up to date for the purposes of assessing Phase 1B (North), and no further baseline updates are presented in this Chapter.
- 13.4.4 Since the s73 ES was prepared, an over-arching Scheme of Archaeological Investigation (covering the extent of the 2014 Permission) which sets out appropriate mitigation measures on a Site-Wide basis to comply with Planning Condition 43.1 of the 2014 Permission has been developed by Waterman. This formed Appendix 13.1 to the Phase 1A (North) FIR. This document, which remains accurate and up to date, satisfies the first element of Planning Condition 43.1, reproduced below:
- “Prior to the commencement of Development an over-arching Scheme of Archaeological Investigation will be submitted to the LPA setting out the process for assessing and mitigating the impact of development on archaeological interest, including appropriate post-excavation analysis, archiving and publication.*
- No part of the Development shall commence within any Phase or Sub Phase unless and until proposals have been submitted to and approved by the LPA for a site-specific Scheme of Archaeological Investigation to preserve or record any archaeological evidence within the Phase or Sub Phase.*
- Each Phase or Sub-Phase of the Development shall take place in accordance with the approved over-arching Scheme of Archaeological Investigation and the site-specific Scheme of Archaeological Investigation approved for that Phase or Sub-Phase”.*
- 13.4.5 The Site-wide Scheme of Archaeological Investigation, approved by GLAAS and LBB in 2015, is included as Appendix B of **Appendix 13.1** and provides an overview of the archaeological background of the Site and surrounding area. It defines areas suitable for further investigation, provides an overall methodology for further investigations, and determines contractor requirements.
- 13.4.6 A Phase 1B (North) Scheme of Archaeological Investigation has been prepared in accordance with the principles outlined in the approved Site-wide Scheme of Archaeological Investigation. This provides an overview of the archaeological background and defines areas suitable for further investigation, providing an overall methodology for further investigations, and determining contractor requirements specifically for those ground-intrusive works identified for this phase of the Development. The specification for this is included as **Appendix 13.1**.

Scope and Methodology

- 13.4.7 The scope of this Chapter remains as per the s73 ES and other EIA Documentation. The methodology set out in those documents is valid for this assessment, given that there have been no significant changes to the baseline, nor applicable legislation, policy and guidance.

Basis of the Assessment

- 13.4.8 In light of the design details now available for the Phase 1B (North) RMA, further assessment, in accordance with the scope and methodology set out in the s73 ES and other EIA Documentation, was undertaken with regard to potential impacts on heritage assets that had been identified as

significant in the s73 ES and other EIA Documentation, and having regard to the previously updated baseline and results of further archaeological investigations presented in the Phase 1A (North) FIR (the latter updating the baseline presented in the s73 ES in respect of Clitterhouse Playing Fields following geophysical survey works undertaken in this area). Where relevant, information updated in the Phase 1A (North) FIR is used in the assessment of Phase 1B (North), where the areas to be affected by development coincide (namely the areas of paleo-environmental interest between the existing Brent Cross Shopping Centre and the A406).

- 13.4.9 This updated assessment focuses on the details for the Phase 1B (North) RMA that are now available, although impact significance ratings are presented in the context of the Development as a whole. The assessment concentrates on the potential for prehistoric activity in the local river valleys and the potential for deposits of palaeo-environmental importance, in accordance with the potential identified for this area of the Site as presented in the s73 ES and other EIA Documentation, and also set out in the Site-wide Written Scheme of Investigation included here in **Appendix 13.1** (Appendix B).
- 13.4.10 The assessment of the previously updated baseline, which is deemed sufficient and up to date, including recent designations and information from recently published reports on archaeological investigations within the study area as well as baseline information pertaining to the Phase 1B (North) RMA, have allowed a quantified assessment of the potential impacts on the heritage resource within the Site. Additionally, and further to consultation with GLAAS undertaken as part of the preparation of the Site-wide Written Scheme of Investigation in 2014 and 2015, mitigation has been refined to appropriately address the areas of potential identified in this revised assessment. As a result, the residual impacts (with mitigation in place) are also presented as a quantitative assessment in this Chapter and therefore update (and are to be read alongside) those of the s73 ES and other EIA Documentation.
- 13.4.11 The potential impacts of the Development on heritage assets have been quantified by Waterman in this Chapter for Phase 1B (North), as was previously undertaken in the Phase 1A (North) FIR in respect of Phase 1A (North).

Significance Criteria

- 13.4.12 The significance criteria set out in paragraph 13.2.21 of the s73 ES separated assets into groups of national, regional, local or poor quality. As far as possible this has been quantified below for the purpose of this assessment, enabling assets to be assessed within specific significance ratings, in line with Historic England guidance^{i,ii}. It should be noted that professional judgement is used in the application of the guidance and to assigning significance.
- 13.4.13 As there have been some minor adjustments to terminology further to those criteria presented in the Phase 1A (North) FIR, they are set out for completeness within this Chapter.
- 13.4.14 The intrinsic significance unique to each heritage asset can be defined as the sum of tangible and intangible values which make it important to society. This may consider age, aesthetics and the fabric of an asset as well as intangible qualities, such as associations with historic people or events.

- 13.4.15 To assess the heritage significance of the assets within the Site, reference has been made to guidance from Historic England^{iii,iv} which recommends making assessments under the categories of: Evidential, Historical, Aesthetic and Communal Value.
- 13.4.16 The heritage value (heritage significance) of the assets is assessed using a number of significance ratings:
- High: A feature, space or theme which is significant at national or international level. These will tend to have a high cultural value and form an important element of a building or site.
 - Medium: A feature, space or theme which is significant at a regional or national level. These will tend to have some cultural merit and form a significant part of the building or site.
 - Low: A feature, space or theme which is of local or regional significance.
 - Neutral: A feature, space or theme which has no cultural significance but is also not considered intrusive to heritage value.
 - Intrusive: A feature, space or theme which detracts from heritage value.
- 13.4.17 In order to more fully understand the effect of the proposed Development with Phase 1B (North) in place on the significance of known and potential heritage, the assessment provides a comparable analysis of the heritage significance of each asset against the predicted magnitude of impact, taking into account the detailed design. This assessment is based on the criteria set out by the Design Manual for Roads and Bridges (DRMB)^v and International Council on Monuments and Sites (ICOMOS)^{vi}, and is a clear way of understanding the magnitude of impact, and how levels of effect vary according to the significance of the heritage asset.
- 13.4.18 The magnitude of impact is assessed based on the criteria set out in **Table 13.1**.

Table 13.1: Magnitude of Impact

Magnitude of Impact	Description
Large Beneficial	The proposed changes will significantly improve the overall setting and character of heritage assets, revealing and/or enhancing important characteristics which were previously unknown or inaccessible. There would be a substantial improvement to important elements of the asset.
Moderate Beneficial	The proposed changes will considerably improve the setting or overall character of the heritage asset. There may be an improvement in key uses and beneficial change (e.g. the creation of coherency) to the characteristics of the asset.
Slight Beneficial	The proposed changes may cause a minor improvement to the setting or overall character of a heritage asset.
Neutral	The proposed changes will have no impact on the heritage asset.
Slight Adverse	The proposed changes will have minor negative impact on the setting or overall character of a heritage asset. Change of this magnitude may be acceptable if suitable mitigation is carried out.
Moderate Adverse	The proposed changes will negatively alter the setting or overall character of the heritage asset. It will likely disturb key features and detract from the overall heritage significance. Change of this magnitude should be avoided where possible, but can be minimised or neutralised through positive mitigation.
Large Adverse	The proposed changes will significantly damage the overall setting and/or character of heritage assets. They will cause a notable disruption to, or in some

Magnitude of Impact	Description
	cases, complete destruction of, important features. Change of this magnitude should be avoided.

13.4.19 The significance of the effect – i.e. the overall impact - on an attribute, is a function of the significance / value of the attribute and the magnitude of impact. This is summarised in **Table 13.2**.

Table 13.2: Significance of Effect

Criteria	Significance / Value			
	Neutral	Low	Medium	High
Large Beneficial	Minor	Minor / Moderate	Moderate / Major	Major / Substantial
Moderate Beneficial	Neutral / Minor	Minor	Moderate	Moderate / Major
Slight Beneficial	Neutral / Minor	Neutral / Minor	Minor	Minor / Moderate
Neutral	Neutral	Neutral	Neutral	Neutral
Slight Adverse	Neutral / Minor	Neutral / Minor	Minor	Minor / Moderate
Moderate Adverse	Neutral / Minor	Minor	Moderate	Moderate / Major
Large Adverse	Minor	Minor / Moderate	Moderate / Major	Major / Substantial

Limitations/Constraints

13.4.20 There were no significant limitations or constraints on the assessment.

13.5 Consultation

13.5.1 Waterman undertook a Site visit accompanied by GLAAS in May 2014. A specification for archaeological evaluation (OSAI) was subsequently submitted to and approved in writing by GLAAS, advisors to LBB, in January 2015. GLAAS were consulted to agree basic principles regarding areas of potential value and identifying the best archaeological investigation approach for these areas.

13.5.2 The EIA Scoping Opinion is presented in **Appendix 4.2**. The approach to the archaeology and cultural heritage assessment was considered acceptable by LBB.

13.6 Baseline Conditions

13.6.1 The baseline information presented in the s73 ES was initially reviewed for the Phase 1A (North) RMAs and reviewed again as part of the preparation of the subsequent EIA Documentation, and is set out in full in **Appendix 13.1**. A brief summary of the baseline of specific relevance to the

Phase 1B (North) area is provided below; other heritage assets of relevance to the wider Site / Scheme are described within the s73 ES and other EIA Documentation.

- 13.6.2 In the baseline review it has been established that Holocene alluvium and underlying Pleistocene terrace deposits are preserved within the historic course of the River Brent. It is possible that archaeological artefacts and other remains may be preserved within these deposits, which are in themselves of interest for palaeo-environmental studies.
- 13.6.3 Prehistoric remains associated with the areas of Holocene alluvium and underlying Pleistocene deposits within the historic channel of the River Brent, where they survive *in situ*, are assets of high (national) significance, and where they survive as secondary deposits are assets of low (local) to medium (regional) significance.
- 13.6.4 The extent to which any potential archaeological remains survive will depend on the nature and extent of any subsequent impacts on the Site - namely later agricultural uses and the subsequent development and redevelopment from the mid-nineteenth century onwards, within areas affected by the Phase 1B (North) Development.

13.7 Assessment and Mitigation

Construction

Potential Impacts

- 13.7.1 Elements of the Construction Impact Assessment (CIA) and Indicative Construction Programme (ICP) have been updated since the submission of the s73 Application and other EIA Documentation (**Appendix 2.1**), including updating the sequence and timing of the construction activities for Phase 1B (North). However, even though the timing and order of the construction activities provided within the s73 ES and other EIA Documentation have changed, the construction activities themselves have not changed and therefore do not change the potential impacts in relation to archaeology and cultural heritage.
- 13.7.2 The assessment of archaeological and cultural heritage impacts presented in the s73 ES and other EIA Documentation was based on outline parameters of those elements which are now submitted in detail as part of the Phase 1B (North) RMA. Specific proposals now exist for the Phase 1B (North) RMA which have been considered using a more refined approach which reflects Historic England guidance, and as such a quantitative assessment of potential impacts from the Development (comprising the Outline Scheme with Phase 1A (North) and Phase 1B (North) in place) is provided in this section. The sources of impact identified in the s73 ES and other EIA Documentation were divided into two categories, 'generic' and 'specific'. The 'generic' category (which relates to construction activities present at all stages of development) does not need to be updated and remains valid, however the 'specific' category (which takes into account the proposed locations of features specific to the phase of development under consideration) is updated above in Section 13.3, in order to take account of the specific proposals for Phase 1B (North).
- 13.7.3 The assessment has been reviewed and updated where necessary to take into account the detailed design information provided as part of the Phase 1B (North) RMA and considers the potential effects of the Development upon the heritage significance of heritage assets and their settings, within the Site and surrounding landscape. **Table 13.3** assesses the effect of the

Development as a whole with the Phase 1B (North) RMA in place on those heritage values of relevance to the Phase 1B (North) area and their significance. Effects from other phases / sub-phases, remain as reported in the other EIA Documentation. This is based on the criteria presented in **Table 13.2**, which define the significance of effect as a function of the value of the asset and the magnitude of impact.

13.7.4 The assessment is broken down in **Table 13.3** to assess the effects upon individual heritage values that contribute to significance as discussed above. Further commentary is then provided below the table.

Table 13.3: Significance of the Effect of the Development on Heritage Values

Heritage Significance	Heritage Value	Magnitude of Impact	Significance of Effect
Evidential	<i>Paleo-environmental-medium</i>	Large Adverse (The proposed changes to this asset would significantly damage the overall character of potential heritage assets within the ASAS and the area between the Brent Cross Shopping Centre and the A406. They will cause a notable disruption to, or in some cases, complete destruction of, potentially significant features.)	Moderate to Major Adverse
	<i>Prehistoric deposits in River Brent channel – high (in situ) or low to medium (secondary)</i>	Large Adverse (The proposed changes to this asset would significantly damage the overall character of potential heritage assets within the historic River Brent channel. They will cause a notable disruption to, or in some cases, complete destruction of, potentially significant features.)	Moderate to Major Adverse
Historical	<i>Paleo-environmental-neutral</i>	None	Neutral
	<i>Prehistoric deposits in River Brent channel – neutral</i>	None	Neutral
Aesthetic	<i>Paleo-environmental-neutral</i>	None	Neutral
	<i>Prehistoric deposits in River Brent channel – neutral</i>	None	Neutral
Communal	<i>Paleo-environmental-neutral</i>	None	Neutral

Heritage Significance	Heritage Value	Magnitude of Impact	Significance of Effect
	Prehistoric deposits in River Brent channel – neutral	None	Neutral

Note: Table 13.3 presents those aspects of heritage value of specific relevance to the Phase 1B (North) development area; all other effects remain as previously considered and reported in the existing EIA Documentation, in particular the Phase 1A (North) FIR which updated the assessment presented in the s73 ES.

Non-designated Heritage Assets

Paleo-environmental Deposits

13.7.5 The likelihood of the presence of paleo-environmental deposits to be present in discrete areas within the north of the Site (between the existing Brent Cross Shopping Centre and the A406, refer to **Figure 13.1** for exact location), has been confirmed by a number of geotechnical investigations, as set out in **Appendix 13.1**. As stated above, this is an asset of medium (regional) significance. A number of ground intrusive works associated with Phase 1B (North) would be carried out in this area, namely the preparatory works carried out in connection with the following elements:

- Transport Interchange T2 (Replacement Brent Cross Bus Station);
- Brent Cross East Development Zone - Plots 101 to 104, 106, 108 and 109;
- Brent Cross Main Square, High Street North, Community Facilities, Neighbourhood Police Unit and the Fenwick Place and Tempelhof Circus Threshold Spaces; and
- The Western and Eastern Brent Riverside Parks and River Brent Nature Park 4.

13.7.6 These works, which include significant ground intrusive elements, would have the potential to significantly damage the overall character of potential heritage assets. They may cause disruption to, or in some cases, complete destruction of, potentially significant features. The magnitude of impact from the Development on paleo-environmental deposits would therefore be large adverse. The Development would therefore have an effect of **permanent moderate to major adverse** significance on paleo-environmental remains within the north of the Site. This effect remains the same as that reported in the Phase 1A (North) FIR (although there has been a slight change to the terminology, as reported in the Assessment Methodology section) which updated the original assessment contained in the s73 ES. This area will be affected by both the Phase 1A (North) and the Phase 1B (North) works.

Pre-historic Remains

13.7.7 The same proposed Development works for Phase 1B (North) listed above, and related to infrastructure and river diversion, would also have a large adverse magnitude of impact on Prehistoric remains associated with the areas of Holocene alluvium and underlying Pleistocene deposits within the historic channel of the River Brent. Where these survive *in situ*, they are assets of high (national) significance, and where they survive as secondary deposits, they are assets of low (local) to medium (regional) significance. Therefore, the effects from the Development would range in significance from **permanent moderate adverse** significance for secondary deposits to

permanent major adverse significance for primary deposits, should these exist within the proposed Development boundary. This effect remains the same as that reported in the Phase 1A (North) FIR (subject to the aforementioned terminology adjustment).

- 13.7.8 All other effects would be as previously reported in the existing EIA Documentation, in particular the Phase 1A (North) FIR which updated the assessment presented in the s73 ES.

Mitigation

- 13.7.9 As stated above, since preparation of the s73 ES and other EIA Documentation, Waterman have carried out consultation with GLAAS (in their role as advisors to LBB). As a result of this consultation it was agreed that the blanket approach originally proposed as mitigation in the s73 ES of a watching brief over all intrusive groundworks was not appropriately refined to address the potential impacts from the Scheme on the different asset groups and on their significance. This has been subsequently addressed in other EIA Documentation, and **Appendix 13.1** sets out an Outline Written Scheme of Investigation which sets out appropriate mitigation as relative to the significance of known or potential heritage assets, and the proposals put forward.
- 13.7.10 This Chapter is supported by **Appendix 13.1**: Phase 1B North Site-specific Scheme of Archaeological Investigation. The aim of this document is to provide a mitigation strategy for Phase 1B (North). This document (and any specific mitigation for Phase 1B (North), which also set out the methodology for fieldwork), are subject to planning conditions and will require approval by GLAAS and LBB prior to the commencement of works.
- 13.7.11 In general terms, the mitigation measures for Phase 1B (North), which overlaps with Phase 1A (North) in some areas, target Holocene alluvium and earlier Pleistocene gravels/silts preserved beneath the former floodplain of the River Brent. Consequently, there is the potential for recovering data relevant to the study of the changing local environment and landscape, and its interaction with human settlement and exploitation through time.
- 13.7.12 As set out in **Appendix 13.1**, and in accordance with Planning Condition 43.1 on the s73 consent, at the time when consultation was undertaken in relation to the Site-wide Written Scheme of Investigation, it was been agreed with GLAAS that it will be necessary to provide information from non-intrusive and intrusive evaluation of parts of the Site, in order to characterise any below ground heritage assets thereby revealed. This evaluation would target areas with both potential for archaeology and low levels of expected truncation, and for Phase 1B (North), would consist of the following mitigation strategies:
- Watching Brief; and
 - Paleo-environmental Sampling.
- 13.7.13 Further information on the mitigation strategies proposed in relation to the heritage assets affected by the Phase 1B (North) RMA is provided below.

Paleo-environmental deposits

- 13.7.14 A number of ground intrusive works would be carried out between the Brent Cross Shopping Centre and the A406, in the area detailed on **Figure 13.1** and comprising the elements of the Development listed in paragraph 13.7.5, which could affect Paleo-environmental deposits.

13.7.15 The mitigation proposed for this asset consists of paleo-environmental sampling ahead of any ground-intrusive works. The methodology for this watching brief is set out in **Appendix 13.1**.

Pre-historic remains

13.7.16 The mitigation proposed for this asset consists of carrying out a watching brief over ground intrusive works related to the sub-phases identified. The methodology for this watching brief is set out in **Appendix 13.1**.

13.7.17 All other mitigation measures for the Scheme remain as reported in the Phase 1A (North) FIR (which updated the mitigation strategy presented in the s73 ES) and the other EIA Documentation, and as detailed in **Appendix 13.1**.

Residual Impacts

Paleo-environmental deposits

13.7.18 The likelihood of the presence of paleo-environmental deposits in discrete areas within the north of the Site (between the Brent Cross Shopping Centre and the A406, and comprising an area which will be affected by both the Phase 1A (North) and the Phase 1B (North) works) has been confirmed by several geotechnical investigations. As stated above, this is an asset of medium (regional) significance. The Development would have an effect of permanent moderate to major adverse significance on paleo-environmental remains within Phase 1B (North). The mitigation proposed (paleo-environmental sampling) would target the location of the historic course of the River Brent as a possible location for settlement during the prehistoric and Roman periods, as well as Holocene alluvium and earlier Pleistocene gravels/silts preserved beneath the former floodplain of the River Brent, which could potentially recover data relevant to the study of the changing local environment and landscape, and its interaction with human settlement and exploitation through time. The aim of this initial stage of mitigation will also be to inform the requirement for, and scope of, subsequent phases of mitigation, such as watching briefs over specific elements of the Phase 1B (North) development area, as set out in **Appendix 13.1**. This mitigation would be consistent with three of the critical priorities set out in the Prehistoric Thematic Strategy as laid out by Historic England, namely:

- Integrated approaches to prehistoric landscapes: filling gaps, understanding biases, improving methodologies and connecting different types of landscape;
- Understanding 'sites without structures': improving understanding of and methods of characterising ephemeral sites, especially lithic scatters; and
- Improving access to unpublished data: grey literature synthesis, archive research, backlog publications and enhancing Historic Environment Record (HER) data.

13.7.19 Given the potentially significant positive contribution that the mitigation measures described in this Chapter would make to the paleo-environmental record of the region, the residual effect of the Development on this asset would be reduced to **permanent** and of **moderate adverse** significance. This residual effect remains the same as that reported in the Phase 1A (North) FIR (subject to the aforementioned terminology adjustment).

Pre-historic Remains

- 13.7.20 Prehistoric remains associated with the areas of Holocene alluvium and underlying Pleistocene deposits within the historic channel of the River Brent, where they survive *in situ* are assets of high (national) significance, and where they survive as secondary deposits are assets of low (local) to medium (regional) significance. The effects from the Development with the Phase 1B (North) RMAs in place would therefore range in significance from permanent moderate adverse significance for secondary deposits to permanent major adverse significance for primary deposits. The mitigation proposed would consist of an archaeological watching brief over ground intrusive works in the sub-phases identified above. The methodology for this watching brief is set out in **Appendix 13.1**. The mitigation identified in the mitigation section would address three of the critical priorities set out in the Prehistoric Thematic Strategy, however, the Development would potentially still result in the complete destruction of this asset, and therefore the residual effect would remain permanent moderate adverse significance for secondary deposits to permanent major adverse significance for primary (*in situ*) deposits. It is important to note that the possibility of encountering primary deposits (*in situ*) in the area proposed for watching brief is very low, due to the very significant truncation caused by the previous diversion of the River Brent. Therefore, for the purposes of this assessment the residual effect is presented as **permanent moderate adverse** significance (for secondary deposits). This residual effect remains the same as that reported in the Phase 1A (North) FIR (subject to the aforementioned terminology adjustment).
- 13.7.21 All other effects would be as previously reported in the existing EIA Documentation, in particular the Phase 1A (North) FIR which updated the assessment presented in the s73 ES.

Operation

Potential Impacts

- 13.7.22 All potential effects on the heritage resource would take place during the construction phase, and therefore no potential impacts would arise during the operational phase of the Development.

Mitigation

- 13.7.23 No mitigation is proposed for the operational phase of the Development, as there would be no potential impacts on the heritage resource during this phase.

Residual Impacts

- 13.7.24 As there are no potential impacts during the operational phase of the Development, there would be **no residual impacts** either, as previously reported in the s73 ES and other EIA Documentation.

References

- ⁱ Historic England, April 2008. Conservation Principles – Policies and guidance for the sustainable management of the historic environment
- ⁱⁱ Historic England, March 2015. *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*
- ⁱⁱⁱ Historic England, April 2008. Conservation Principles – Policies and guidance for the sustainable management of the historic environment
- ^{iv} Historic England, March 2015. *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*
- ^v The Highways Agency, August 2007. Design Manual for Roads and Bridges, Volume 11, Section 3, Part 2 HA 208/ 07 Cultural Heritage
- ^{vi} International Council on Monuments and Sites (ICOMOS), 2010. Guidance on Heritage Impact Assessments for Cultural World Heritage Properties