

CITY PLAN 2019 - 2040

Archaeological Statement

Regulation 19 Consultation

March 2024

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1 Introduction

1.1 Introduction

This report identifies the level of known archaeological interest for sites marked for allocation and makes recommendations of requirements that should be set out for any development that takes place.

It begins with an overview of policy context in relation to Archaeology including Archaeological Priority Areas and the Archaeological Risk Model outlined in Historic England's Greater London Archaeological Advisory Service (GLAAS) Guidelines. It then assesses the four sites proposed for allocation in the partial review of Westminster's City Plan, considering presence of any known or potential buried heritage assets, their significance, whether this impacts the allocation and potential for development on the site and any recommendations for further assessment or mitigation which may be required. Finally, the report summarises and responds to advice received from GLAAS on each of the sites.

This report provides a high-level overview of archaeological potential on these sites and should be cross referenced with the separate more detailed Heritage Impact Assessments which focus on above-ground heritage assets for all allocated sites.

1.2 Archaeological Priority Areas

The GLAAS guidance was developed to provide a consistent approach across London and has defined areas of Archaeological Priority Areas (APAs) as locations where there is 'significant known archaeological interest or particular potential for new discoveries.'¹ They are identified in local plan policies to recognise and conserve archaeological interest. GLAAS undertook an appraisal of Westminster's archaeological priority areas in 2017 and expanded these to include 16 areas of archaeological priority.² They are identified in Figure 34 of the [City Plan](#) and the approach to their protection and management is set out in Policy 39, O,P and N. This requires applicants for development which involves excavation or ground works in APAs or other areas suspected of having archaeological potential to demonstrate that they have properly evaluated the archaeological potential of the site and assessed and planned for any archaeological implications of development. This is further expanded on in supporting text at paragraphs 38.18 to 39.22 covering archaeological interest.

Tiered system

The GLAAS guidelines provide a framework that allows decision makers to focus their resources and technical expertise on developments where archaeological interests are a necessary and significant consideration. The tiered system distinguishes those areas which are most significant and sensitive to change from those which although still of interest are not quite so vulnerable.

- **Tier 1** is a defined area which is known, or strongly suspected, to contain a heritage asset of national significance (a scheduled monument or equivalent); or is otherwise of very high archaeological sensitivity.
- **Tier 2** is a local area within which the GLHER holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest.
- **Tier 3** is a landscape scale zone within which the GLHER holds evidence indicating the potential for heritage assets of archaeological interest.
- **Tier 4** (outside APA) is any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area. Tier 4 areas are not necessarily devoid of archaeological interest and may retain some potential unless they can be shown to have been heavily disturbed in modern times.

GLHER: Greater London Historic Environment Record

Further information can be found in Greater London Archaeological Priority Area Guidelines.³

¹ Greater London Archaeological Priority Area Guidelines: <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/>

² City of Westminster Archaeological Priority Areas Appraisal: <https://historicengland.org.uk/content/docs/planning/apa-city-of-westminster-pdf/>

³ Greater London Archaeological Priority Area Guidelines.

Archaeological Risk Model

Archaeological risk model	Outside APA	Archaeological Priority Area		
	Tier 4	Tier 3	Tier 2	Tier 1
4 Large Major Site area 2 hectares or more	Medium*	High	High	High
	Low			
3 Major Site area 0.5 to 2 hectares	Low	Medium	Medium	High
2 Minor Site area less than 0.5 hectares New basements	Negligible	Low	Medium	High
1 Very minor Householder developments** and equivalent minor works	Negligible	Negligible	Negligible	Medium

Table 1: Archaeological Risk Model

* Very large site area of 10 hectares or more

** Other than new or extended basements

Table 1 outlines the Archaeological Risk Model which designates potential developments a risk rating depending on the size of the proposed development and the APA tier of the site. Developments can be high, medium, low, or negligible risk.

The archaeological risk model gives an indication of the circumstances where an archaeological assessment is more or less likely to be necessary and is also helpful in assessing the appropriateness of site allocations including where development may pose risk of harm to archaeological assets and any mitigation or further information that may be required.

- **High risk** means developments likely to cause harm to heritage assets of archaeological interest and fairly likely to cause significant harm.
- **Medium risk** means developments fairly likely to cause harm to heritage assets of archaeological interest and sometimes causing significant harm. Because they are more common, moderate risk cases cumulatively pose an overall threat broadly equivalent to the high risk category.
- **Low risk** means developments less likely to cause harm to heritage assets of archaeological interest and only rarely cause significant harm. But low risk is not the same as negligible risk: some sites in this category will have potential for new discoveries. Low risk sites are not necessarily devoid of archaeological interest, but it is less likely to be present. New or unexpected discoveries are possible in most locations.
- **Negligible risk** means developments only rarely causing harm to heritage assets of archaeological interest and hardly ever causing significant harm.

All major planning applications (0.5 hectares and above) whether in an APA or not are determined in consultation with the Greater London Archaeological Advisory Service (GLAAS) at Historic England. They must also be accompanied by an archaeological desk-based assessment. Any allocated site which subsequently required a planning application would therefore require a desk-based assessment.

2 Site Allocations

2.1 Introduction

The four sites proposed for allocation in the City Plan Partial Review were subject to high level assessment for archaeological interest based on the guideline summarised previously. Three sites are in tier 4 and therefore not in an Archaeological Priority Area. One site is in Tier 3. A summary of archaeological risk and potential for each site is set out below, with more detailed analysis provided for the Tier 3 site only.

Site	Size	Tier	Risk
Grosvenor Sidings	1.81ha	APA Tier 3	Medium risk and some limited archaeological potential.
Westbourne Park Bus Garage, Great Western Road, W9 3NW	2.31ha	Tier 4 (outside APA):	Low risk and limited potential for archaeological survival of significance
Land at and adjacent to Royal Oak Underground Station	1.2ha	Tier 4 (outside APA):	Low risk and limited potential for archaeological survival of significance
St. Mary's Hospital, Praed Street, W2 1NY	3.9ha	Tier 4 (outside APA):	Low risk and limited potential for archaeological survival of significance

Table 2: Archaeological risk of sites

A map can be found in Appendix 1.

The three sites outside an APA have all been subject to significant previous development and disturbance and all present low archaeological potential, with no significant risk, therefore they are not examined in detail in this report and are all considered appropriate for allocation, subject to a requirement for development proposals to be accompanied by an archaeological assessment. It should be noted that archaeological desk-based assessments and some investigative work have previously been carried out for Crossrail on the Royal Oak site as well as adjoining sites in Paddington and these are referenced within the appendices to this document. St Mary’s Hospital, given its size and complexity, is subject to a separate and detailed Heritage Impact Assessment which also covers archaeological potential.

For the other sites, the council will also publish a Heritage Impact Assessment (HIA). The HIAs will be produced in accordance with Historic England’s HEAN 3 Guidance for the Selection of Site Allocations. The HIAs will detail the impact development could have on all heritage assets and their settings, but with a focus on impact on above-ground assets and townscape character.

Details of the archaeological interest have been taken from Historic England’s City of Westminster Archaeological Priority Areas Appraisal (March 2017)⁴. In addition, archaeological potential has been assessed by consulting other local history sources including historic maps, the adopted Westminster Conservation area audits and archaeological reports submitted with applications in the vicinity.

⁴ City of Westminster Archaeological Priority Areas Appraisal (March 2017): <https://historicengland.org.uk/content/docs/planning/apa-city-of-westminster-pdf/>

2.2 Grosvenor Sidings

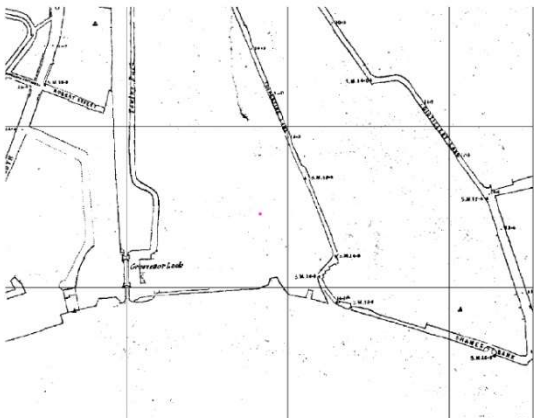


Figure 4.5 OS Map dating from 1850

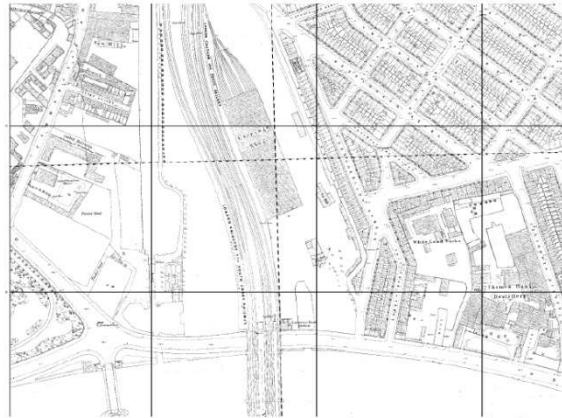


Figure 4.6 OS Map dating from 1875

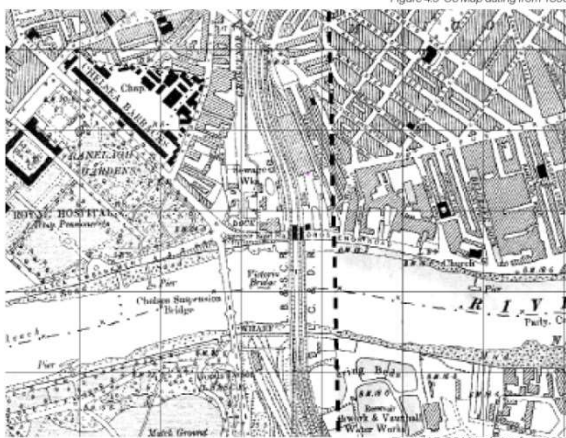


Figure 4.7 OS Map dating from 1898

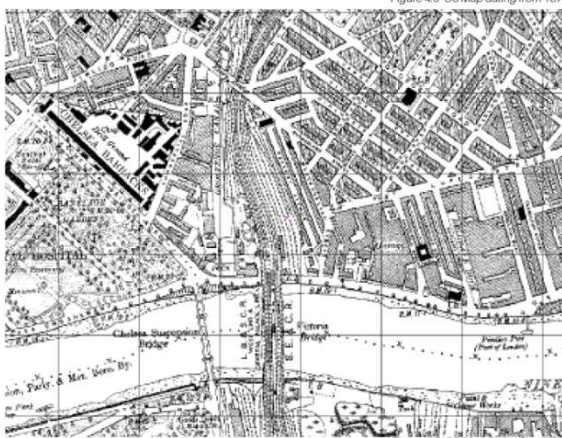


Figure 4.8 OS Map dating from 1920

Figure 1: OS Maps of Grosvenor Sidings from 1850 to 1920

The Grosvenor Sidings site (OS grid ref: TQ286782) is a 1.81 hectares site located within Archaeological Priority Area **3.2 Pimlico**. There is one designated heritage asset within the site: the Grade II listed 123A, Grosvenor Road SW1, formerly Station Master's House. It is outside a conservation area.

This APA covers the junction of the Thames and Tyburn rivers. Until the 19th century, and for much of its history, it was a low-lying marsh. Due to its historic topography, there is a high potential for the preservation of organic remains.

Several former water channels have been found during excavations. Pottery, tools, and weapons dating to the prehistoric period have been found throughout the area. The Battersea Shield, a piece of late Iron Age decorative parade armour potentially used as votive offering, is perhaps the most well-known find recovered from the river close to the site and near Chelsea Bridge.

Further prehistoric finds may have been preserved within this former wetland environment and could be considered of national importance. However, subsequent 18th and 19th century development including formation of canal and subsequent railway infrastructure will have reduced the potential for discovery of significant archaeological remains on the site.

Ebury, a significant Historic settlement, listed in the Domesday Book as Eia, was located in the vicinity of what is now the south-western end of Buckingham Palace Road to the north of the site. Remains of the settlement could be of local interest but are unlikely to be within the site.

In the early 18th century Chelsea Water Company built a complex network of canals and channels covering 100 acres. The waterworks was an important part of London's infrastructure. Finding remains could improve knowledge of its operation and effectiveness. The former Grosvenor dock built by the company was located on the site. There is therefore potential for discovering surviving areas of canal infrastructure and features associated with water management. This would be of local interest.

The site has some archaeological potential for discovery of railway or canal infrastructure or deeply buried riverine or riverside archaeology. However, the impact of previous development may be substantial, and the impact of new development will depend on the nature of deep groundworks.

Given the potential archaeological interest in the site and the size of the site, GLAAS advise that GLHER and GLAAS should be consulted on any development proposals when they come forward, and an up-to-date archaeological desk-based assessment including a geo-archaeological deposit should accompany any planning application. Signposting to such requirements in any site allocation is recommended.

2.3 Land at and adjacent to Royal Oak Underground Station

Archaeological work was undertaken just to the west of the allocation site by Oxford Archaeology/Gifford in 2010 to 2011. At Royal Oak the main findings were of a geological scour or channel which had cut through the London Clay and infilled with a series of cold-climate Pleistocene deposits and a possible warm climate interglacial deposit. A channel cut possibly represented a former later channel of the river Westbourne. No Palaeolithic artefacts were found in 2010/11 but a scatter of them is known from earlier finds in the vicinity and evidence from this early period is rare so any finds are significant.⁵

Advice from GLAAS is that the extent of disturbance already experienced through Crossrail works in the area means the GLAAS risk model assessment that the site is low risk is likely accurate.

⁵ Crossrail Fieldwork Report held in GLHER

2.4 St Mary's Hospital

Parts of this site were covered by a desk-based assessment prepared by Aecom in 2016. This found the site to have generally low archaeological potential having been subject to extensive modern disturbance although remains of 19th century urban and industrial use were anticipated. Based on Aecom's assessment an archaeological condition was attached to planning permission 16/11914/FULL.

Advice from GLAAS is that whilst the findings of the Aecom assessment are consistent with those of the GLAAS risk model that the site is of low risk, it is still possible that some significant 19th century archaeology survives. An updated desk-based assessment at planning application stage, when detailed proposals for the whole site are understood, is therefore recommended, and any site allocation should signpost to this and the need for appropriate mitigation where necessary.

2.5 Westbourne Park Bus Garage

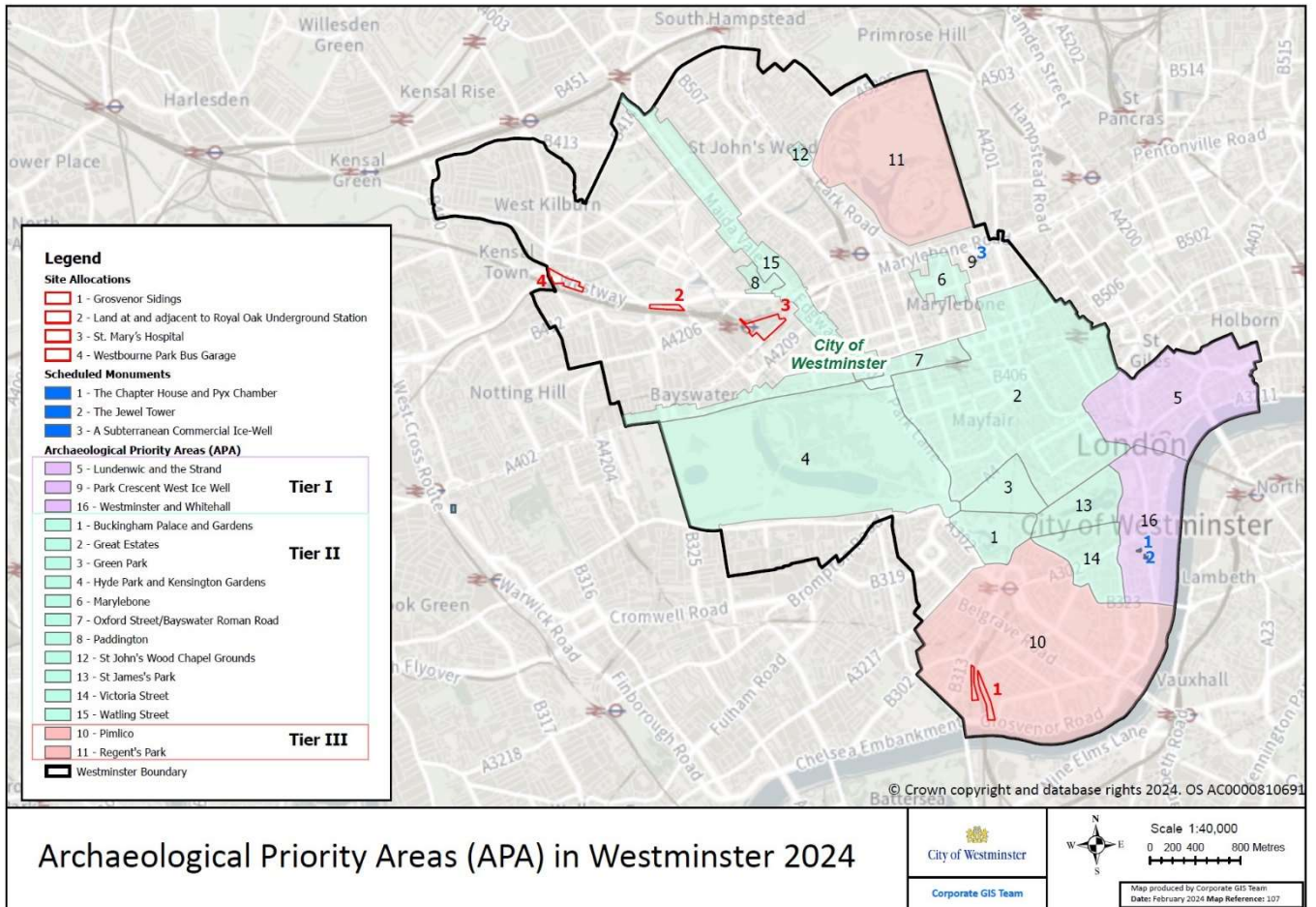
Archaeological work was undertaken in the western part of the allocation site (South of A40 Westway) by Oxford Archaeology/Gifford in 2010 to 2011 and then Oxford Archaeology/Ramboll during 2014 in connection with Crossrail works at Paddington New Yard. In 2010/11 at Westbourne Park the brick remains of a house associated with the railway, Alfred Villa, were excavated and recorded. In 2014 more extensive investigations uncovered the well-preserved below ground remains of a number of structures were uncovered and recorded. These included brick-built turntable pits, the walls of engine sheds and below-ground inspection pits, as well as sections of the Marcon Sewer. All of the remains related either to the Great Western Railway's locomotive department workshops and stabling sheds which were present on the site from c.1853 to 1907, or subsequent developments of the site by the GWR and their successor bodies. The depot, which was designed by the Great Western Railway's Chief Engineer Isambard Kingdom Brunel and his Locomotive Superintendent Daniel Gooch, was an important component of, what was at the time, one of the most innovative railways in the world.⁶

Advice from GLAAS is that the extent of disturbance already experienced through Crossrail works in the area means the GLAAS risk model assessment that the site is low risk is likely accurate.

⁶ Crossrail Fieldwork Report held in GLHER

3 Appendix

3.1 Appendix 1- Map of Site Allocations, APAs and Scheduled Monuments



3.2 References

Archaeological Watching Brief in the vicinity of Westbourne Park and Royal Oak Stations, Paddington, London
(archaeologydataservice.ac.uk)

Westbourne Park and Royal Oak portal site specific archaeological detailed desk-based assessment - Appendix A
(crossrail.co.uk)

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