

Chapter 12: Archaeology

ASSESSMENT METHODOLOGY

TOPIC	ARCHAEOLOGY
AUTHOR	Mills Whipp Projects Ltd
COMPARISON OF EFFECTS	The assessment presented within this ES Chapter is based on the revised proposals (referred to as the 'Proposed Development'), as described in Chapter 0 'Preface' and Chapter 4 'The Proposed Development'. A comparison of the findings and conclusions of this assessment against those of the December 2018 ES in relation to archaeology is provided in the section of this ES Chapter titled 'Comparison of Effects'.
SUPPORTING APPENDIX	ES Volume 3 – Appendix: Archaeology Annex 1: Archaeological Desk Based Assessment 2021 Annex 2: PCA Archaeological Evaluation Summary and Full Report 2018
KEY CONSIDERATIONS	This ES Chapter assesses the likely significant effects of the Proposed Development upon below ground archaeological heritage assets on and near the site, and the settings of any below ground archaeological assets within close proximity. Potential effects addressed in this ES Chapter in relation to archaeology includes: <ul style="list-style-type: none"> • Direct impacts on buried archaeological deposits from land disturbance caused by construction of the development; and • Direct impacts upon historic boundaries from construction.
CONSULTATION	An EIA Scoping Report was prepared and submitted to the LBS for discussion on the 24th September 2018 in relation to the 2018 Environmental Statement (ES) (see ES Chapter 2 – EIA Methodology (Volume 1)). Informal feedback on the Scoping Report was received from the LBS on the 29th November 2018 in the form of a high level review (the 'LBS Review') with recommendations for consideration within the ES. The LBS Review comments were incorporated where appropriate within the 2018 ES that was submitted in support of the 2018 planning application to the LBS. A summary of the key points raised in the LBS Review in terms of the approach and methodology is presented within Annex A of this ES Chapter. This table signposts where these issues have been addressed within the chapter. In addition to the Scoping Process, the 2018 ES was reviewed by an independent third party (Land Use Consultants (LUC)) on behalf of the LBS. The feedback received from LUC on the 2018 ES was responded to at the time and has been, as relevant be incorporated into this 2021 ES, thus ensuring that the 2021 ES for the revised scheme is comprehensive in terms of scope and addresses requested clarifications and additional information points raised previously by LUC on behalf of the LBS under Regulation 25 of the EIA Regulations. The 2018 scoping process was undertaken in detail and has provided the Applicant, Trium and Millswhipp with sufficient knowledge of the site and the surrounding area to be able to determine the scope of the EIA for the 2021 revised scheme. Detailed discussions were undertaken in 2018 with Ms Gill King (London Borough of Southwark (LBS) Senior Planner Archaeology) regarding the desk-based assessment and the scope of the archaeological evaluation. The archaeological potential of the site reflected in the HER datasets, summarised in the desk-based assessment (Annex 1), was discussed and the evaluation methodology, trench locations and depths were considered. These were then set out within the written scheme of investigation (WSI) for the evaluation of the site. The WSI was approved by LB Southwark on 23 rd October 2018 and the results of the evaluation are appended (Annex 2). Ms King has since left LBS (2020) and the Senior Planner Archaeologist is now Dr Christopher Constable. Preliminary discussions have been undertaken with him and he has confirmed he will be following the advice provided by Ms King. In October 2020, an EIA scoping note was issued to the GLA (see ES Chapter 2 – EIA Methodology (Volume 1)). The note confirms that in determining the scope of the EIA for the amended scheme, reference has been made to the September 2018 Scoping Report, the November 2018 LBS Review, the 2018 ES, the 2019 ES Addendum and the LUC Review. A further scoping meeting (virtual) was held with the GLA on 8th September 2021 to review and confirm the approach to the EIA.

BACKGROUND

- 12.1 An Archaeological Desk-Based Assessment (DBA) has been prepared (October 2021) and is presented within **ES Volume 3 - Appendix: Archaeology**. This ES Chapter contains a summary of the baseline conditions, an assessment of the proposed scheme's impact on archaeology and potential mitigation measures.
- 12.2 A programme of archaeological fieldwork was undertaken on the site in November 2018 as part of the submission material for the planning application. The evaluation involved the excavation of 4 trenches and a number of boreholes across the site. The boreholes measured the depth of deposits in order to assess the nature of buried waterlogged deposits. The Summary Report of the Archaeological Evaluation can be found within **ES Volume 3 - Appendix: Archaeology - Annex 2**.

Defining the Baseline

Current Baseline Conditions

- 12.3 The following standards and guidance have been adopted in preparing this ES Chapter:
 - Chartered Institute for Archaeologists (CIfA)¹
 - The National Policy Planning Framework (NPPF)²;
 - The Planning Practice Guidance (NPPG)³;
 - Historic England guidance (Good Practice Advice Documents 2015 & 2017)⁴;
 - Greater London Archaeology Advisory Service Guidelines⁵
 - Chartered Institute of Field Archaeologists - Code of Conduct;
 - Chartered Institute of Field Archaeologists, 2019 Standard and Guidance for Archaeological Desk-based Assessments;
 - Historic England - Guidelines for Archaeological Projects in Greater London (April 2015); and
 - English Heritage, 1991 - Management of Archaeological Projects.

- 12.4 Archaeological remains are recorded in national and/or local historic environment databases, in this instance the National Monuments Record (NMR) and the Greater London Historic Environment Record (GLHER). These data sources have been used in the preparation of this ES Chapter and to inform the archaeological approach to the site. Listed below are the data sources consulted during the compilation of the baseline condition:

- London Borough of Southwark (LBS) reference collection;
- Greater London Historic Environment Record (HER);
- London Metropolitan Archive (LMA);
- Key historic maps;
- London Library; and
- The Society of Antiquaries.

Study Area

- 12.5 The study area for the baseline assessment is 200m radius centred on (NGR) TQ 3310 7990. Its geographical area was designed to provides a suitable sample size of HER entries, datasets include designated and non-designated heritage assets listed as both events and monuments, in order to assess the archaeological potential of the site. Information relating to sites and features outside the study area will be referenced where this provides insights or parallels to the wider historical, cultural or archaeological context.

Evolution of the Baseline

- 12.6 Consideration is given to how the baseline archaeological condition could evolve in the future, in the absence of the Proposed Development (references to the Proposed Development throughout this ES Chapter unless specified otherwise refers to the 'revised' October 2021 scheme).

Impact Assessment Methodology

Demolition and Construction

- 12.7 This assessment considers the nature, scale and significance of the effects to archaeological remains that will arise during the construction phase, with the effects defined on the basis of any changes compared to the current baseline. Accordingly, this assessment considers the following potential effects:
 - Direct effects on buried archaeological remains; and

¹ CIfA (2019) Standard and guidance. Historic environment desk-based assessment & CIfA Code of Conduct (2017)

² National Policy Planning Framework (2021). Website: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³ Website: <https://www.gov.uk/government/collections/planning-practice-guidance>

⁴ EH (2015) Historic Environment Good Practice Advice in Planning Note 2. Managing Significance in Decision Taking in the Historic Environment.

⁵ HE Greater London Archaeology Advisory Service (2015) Guidelines for Archaeological Projects in Greater London

- Indirect effects on the settings of buried archaeological remains.

12.8 Potential impacts from construction have been evaluated by first determining the archaeological importance of the assets affected i.e. their sensitivity. This is expressed as 'International', 'National', 'Regional', 'Local' or 'None' and is set out in **Table 12.1** 'Criteria used to Determine Importance of the Asset'. Against this, development impact (magnitude of change) is reviewed by applying the criteria set out in **Table 12.2** 'Criteria for Assessing the Magnitude of Impacts'. Appropriate mitigation measures are then proposed in response to the predicted impact. These would comprise a programme of archaeological work outlined within a written scheme of investigation (WSI) to be approved by LBS. The mitigation works would take place prior to any ground works on the development site. Finally, any residual effects following the implementation of the mitigation measures is assessed. The criteria used to identify and express the significance of these effects are described in **Table 12.3**.

12.9 The assessment of the scale of effects is based on extensive professional experience gained on other major developments across London and southern England.

Assumptions and Limitations

12.10 The assessment assumes the accuracy of the available datasets (as set out in paragraph 12.5) reviewed in its compilation.

12.11 The difference in proposed use classes between Option 1 and 2 of the Proposed Development are not considered relevant for the archaeology assessment. It is noted that Option 2 (i.e. B1b) basement plans have been used for this assessment, however it is acknowledged that the three basement levels for both Option 1 and Option 2 are the same and therefore either can be used with regards to the archaeology assessment.

Completed Development

12.12 The impacts on archaeological remains arising from the completed Proposed Development will occur during demolition and construction works. Consequently, the completion and operation of the Proposed Development is not expected to have any impact on archaeological remains and no further assessment is presented in this ES Chapter.

Methodology for Defining Effects

Receptor Importance⁶

12.13 Receptors are either known as:

- Designated;
- Non-designated archaeological remains; or
- A perceived potential for archaeological remains.

12.14 Determination of the importance of the archaeological remains is based on existing statutory designations.

12.15 For undesignated assets, the importance of the archaeological remains is based on the Secretary of State's non-statutory criteria for Scheduling Monuments⁷, Historic England's Conservation Principles⁸ and professional judgement.

12.16 The NPPF⁹ introduced criteria for the assessment of the significance of archaeological remains and these have been factored into this assessment.

12.17 The importance of an archaeological remain can be defined as of International, National, Regional/County, Local or No Importance. The criteria to establish the importance of archaeological remains are described in **Table 12.1**.

Table 12.1 Criteria used to Determine Importance of the Asset

Importance	Description
International	Archaeological sites or monuments of international importance, including World Heritage Sites. Structures and buildings inscribed as of universal importance as World Heritage Sites. Other buildings or structures of recognised international importance.
National	Monuments scheduled under the Ancient Monuments and Archaeological Areas Act 1979, or archaeological sites and remains of comparable quality, assessed with reference to the Secretary of State's non-statutory criteria. Undesignated structures of national importance.

Regional / County	Archaeological sites and remains which, while not of national importance, score well against most of the Secretary of State's criteria.
Local	Archaeological sites that score less well against the Secretary of State's criteria.
None	Areas in which investigative techniques have produced no or only minimal evidence for archaeological remains, or where previous large-scale disturbance or removal of deposits can be demonstrated.

Magnitude and Nature of Impact

12.18 Determining the magnitude of impact is based on an understanding of how, and to what extent, the Proposed Development would have a direct impact on the buried archaeological remains.

12.19 The magnitude of impact is rated as High, Medium, Low and Negligible.

12.20 The nature of the impact can be described as adverse or beneficial. The criteria in **Table 12.2** has been adopted for assessing the magnitude and nature of the impact.

Table 12.2 Criteria for Assessing the Magnitude of Impacts

Magnitude	Direct Impacts	Indirect Impacts
High Adverse	Complete removal of an archaeological site.	Radical transformation of the setting of an archaeological monument.
Medium Adverse	Removal of a major part of an archaeological site and loss of research potential.	Partial transformation of the setting of an archaeological site e.g. the introduction of significant noise or vibration levels to an archaeological monument leading to changes to amenity use, accessibility or appreciation of an archaeological site.
Low Adverse	Removal of an archaeological site where a minor part of its total area is removed but the site retains a significant future research potential.	Minor change to the setting of an archaeological monument.
Negligible	No impact from changes in use, amenity or access. No change in the ability to understand and appreciate the resource and its historical context and setting.	No perceptible change in the setting of a building or feature.
Low Beneficial	Land use change resulting in improved conditions for the protection of archaeological remains.	Decrease in visual or noise intrusion on the setting of a building, archaeological site or monument. Improvement of the wider landscape setting of a building, archaeological site or monument.
Medium Beneficial	Land use change resulting in improved conditions for the protection of archaeological remains plus interpretation measures (heritage trails, etc).	Significant reduction or removal of visual or noise intrusion on the setting of a building, archaeological site or monument. Improvement of the wider landscape setting of a building, archaeological site or monument. Improvement of the cultural heritage amenity, access or use of a building, archaeological site or monument.
High Beneficial	Arrest of physical damage or decay to archaeological remains, building or structure.	Exceptional enhancement of a building or archaeological site, its cultural heritage amenity and access or use.

Effect Scale and Significance

12.21 The scale of the effect of the Proposed Development on archaeological remains is determined by:

- The importance of the asset (refer **Table 12.1**); and
- The magnitude of impact to the asset (refer **Table 12.2**).

12.22 **Table 12.3** presents a matrix that demonstrates how the scale of effect has been assessed.

⁶ Note: This terminology differs from other chapters in the ES, due to archaeological guidelines / best practice, but effectively is the 'sensitivity' of a resource or receptor.

⁷ Ancient Monuments and Archaeological Areas Act (1979)

⁸ Historic England (2017) Conservation Principles (draft)

⁹ National Planning Policy Framework (2021)

Table 12.3 Effect Scale

Importance of Asset	Magnitude of Impact			
	Negligible	Low	Medium	High
International	Negligible	Moderate	Moderate/Major	Major
National	Negligible	Minor	Moderate/Major	Major
Regional / County	Negligible	Minor	Minor/Moderate	Moderate
Local	Negligible	Negligible	Minor	Minor/Moderate
No Importance	Negligible	Negligible	Negligible	Negligible

12.23 The methodology for describing the effect set out within *ES Chapter 2 - EIA Methodology (Volume 1)* has been adopted for this assessment. The following criteria is applied for determining the significance of effect:

- 'Moderate' or 'Major' are deemed to be 'significant'; and
- 'Minor' and 'Negligible' are considered to be 'not significant'.

12.24 Where effects are of minor/moderate scale, professional judgement is applied to determine whether the effect is considered 'significant'.

12.25 The NPPF assesses the degree of impacts affecting the significance of heritage assets in terms of harm and there is a policy requirement to determine whether any level of heritage harm identified is 'substantial' or 'less than substantial' in NPPF terms. Determining the level of harm to the significance of a heritage asset is one of professional judgement although case law has held that in order to be substantial in NPPF terms the impact on significance is required to be serious such that very much, if not all, of the significance of the asset is drained away.

12.26 Effects can also be described in terms of being direct and indirect, which are defined as:

- **Direct impacts:** are defined as an impact caused by an action, which generally occurs at the same time and place as that action. They are generally associated with the construction, operation or maintenance of a facility or activity and are usually obvious or quantifiable; and
- **Indirect impacts:** are defined as changes resulting from primary impacts. These changes include impacts to the setting of assets; effects can be short or long term depending on their persistence or duration.

Effect Duration

12.27 Archaeological remains represent a finite resource. Development activities have the potential to irreversibly disturb or remove archaeological remains which cannot then be replaced or restored to their original state without a loss of significance (heritage value). As a result, all potential impacts and likely effects arising during construction of the Proposed Development will be permanent.

BASELINE CONDITIONS

Current Baseline Conditions

12.28 The following baseline conditions were derived as a result of desk-based research, as described more fully in *ES Volume 3 - Appendix: Archaeology*, and evaluation works reported upon in the *Summary Report of an Archaeological Evaluation*, located in Annex 2.

Geology and Topography

12.29 The site lies approximately 400m south of the River Thames at an elevation of about 3.6m OD. In the prehistoric and Roman periods it lay towards the eastern edge of the eyot on the eastern bank of the Guy's Channel at an elevation of approximately varying between 0.50m OD and 1.00m OD. The eyot's surface was low lying, marginal ground which may have remained mostly unoccupied in the prehistoric, Roman and early mediaeval periods. This has been confirmed by an archaeological evaluation undertaken in November 2018 which demonstrated deep alluvial deposits extending to up to -2.5m OD (refer to Annex 2).

Prehistoric

12.30 It is certain that during the prehistoric period there was some limited exploitation of the general area of Southwark with settlement on the higher ground and fishing, trapping and wild-fowling on the marginal, peripheral ground. Generally, however, current evidence for the late prehistoric landuse of Southwark suggests a landscape

occupied by a few dispersed farmsteads on higher ground. The archaeological and topographical evidence, including the evaluation (Annex 2), shows that the site lay on marginal ground in a waterlogged area.

Roman

12.31 Archaeological evidence suggests that the Roman settlement in Southwark was mainly confined to the used as the southern bridgehead of London Bridge. The site lay approximately 300m southwest of the Roman suburb's core but more importantly on the far side (east) of the Guy's Channel, on a completely separate and lower lying eyot. Here, the general lack of Roman archaeological evidence indicates that it lay outside the Roman settlement on uninhabitable ground. This has been confirmed by recent archaeological evaluation (Annex 2).

Saxon

12.32 There is no archaeological evidence for early Saxon landuse in the vicinity of the site. This may be due to a rise in the level of the Thames in the early mediaeval period, so rendering the eyot even more inaccessible than it previously was. No significant Saxon finds have been reported from the vicinity of the site.

Medieval

12.33 Southwark remained a relatively small settlement throughout the medieval period. The site lay 500m beyond its south-eastern side in an open, undeveloped area of fields later called Snows Field. Archaeological evidence in the study area and recent evaluation (Annex 2) show that the marshy conditions in this area, such as those on the low lying eyot, continued into the medieval period. No significant medieval finds have been made in the vicinity of the site. It seems that the waterlogged nature of the ground in the vicinity of the site delayed any intense development of this area until the 16th century.

Post Medieval

12.34 Southwark in the later 16th century was a thriving suburb expanding southwards along the major routes from its medieval core, including Bermondsey Street. Within the general vicinity of the site the ground remained waterlogged and suffered seasonal flooding; a situation that persisted until the establishment of an effective river wall on the Thames frontage c.1500.

12.35 Buildings were erected along the principal roads, including Bermondsey Street, to the east of the site. These included on or near the site a mansion owned by one Henry Goodyere which he built around 1540. Traces of a 16th century structure were uncovered during the evaluation (Annex 2).

12.36 Away from the street frontages the general area remained open and undeveloped until well after the early expansion of the suburb had overtaken it. Alluvial deposits and drainage schemes including land consolidation dumps, a network of ditches and brick and timber drains from this period have been recorded across the study area.

12.37 By the 17th century Bermondsey Street was lined with buildings almost for its entire length. At that time the site was occupied by a series of tenements running back from Bermondsey Street which had yards and outbuildings to the rear. At the western part of the site a large ditch ran north-east to south-west. By the mid-18th century the site had an open yard named 'Vinegar Yard' presumably as a result of the opening of a Vinegar Works. By the early 19th century a number of small buildings were irregularly arranged around a number of open yards, including Vinegar Yard.

Evaluation Findings – A Summary

12.38 The conclusions of the *Summary Report of an Archaeological Evaluation*, (located in Annex 2), are set out below to provide further context on the existing archaeological baseline.

12.39 The evaluation demonstrated that natural sands exist at levels between -0.45m OD in Trench 4 (located in the eastern part of the site) and -2.15m OD in Trench 2 (which was aligned east to west across the site). The sand was sealed by alluvial deposits consistent with the gradual silting of Guy's Channel through the prehistoric to late medieval period.

12.40 Evidence was seen for late-medieval to early post-medieval land reclamation, achieved by the dumping of material onto the alluvium to consolidate the ground. This allowed the site to be developed with dwellings and properties, including the suggestion of a Tudor period chalk wall in Trench 3 (which was a north to south orientated trench, located in the eastern part of the site) which had later been reconfigured and clearly stood for long enough to influence the alignment of a series of post-medieval tanning pits to the north.

12.41 A post-medieval ditch was seen in Trench 2 which is likely to be the same one depicted on Morgan's map of 1682.

RECEPTORS AND RECEPTOR IMPORTANCE

12.42 Table 12.4 below details the known archaeological remains, and potential archaeological resources identified within the site from the Greater London Historic Environment Record (GLHER), from the desk-based assessment (DBA), and includes the locally designated Archaeological Priority Zone (APZ).

Table 12.4 Archaeological Heritage Resources and the Importance

Description of Resources	Potential occurrence below ground	Importance of the Asset
Prehistoric Occupation	Low	Local
Roman Occupation	Low	Local
Saxon Occupation	Low	Local
Mediaeval Occupation	Low	Local
Post Medieval Occupation	Moderate / High	Regional / Local

POTENTIAL EFFECTS

Demolition and Construction

- 12.43 A nationally significant designated heritage asset lies 200m west of the site, the Guy's Channel Roman Boat (SAM 157). There are known non-designated archaeological remains within the site.
- 12.44 Any effects on known below ground archaeological remains (non-designated) outside the site will be **negligible** (not significant) and, are therefore not considered further.
- 12.45 The construction of the Proposed Development has the potential to have a high magnitude of impact on any existing archaeological remains, through machine stripping and removal of all pre-modern deposits on the site for the creation of a new 3 level basement across the site and building foundations. The effect would be adverse and permanent.
- 12.46 When considering the importance of the potential archaeological remains, an evaluation of the predicted impacts and subsequent nature, scale and significance of effects has been undertaken and is reported upon in Table 12.5.

Table 12.5 Evaluation of Predicted Impacts and Effects

Description	Importance	Magnitude of Impact	Scale of Effect (Significance)
Low Potential for Prehistoric Occupation	Local	High Adverse	Negligible (Not Significant)
Low potential for Roman Occupation	Local	High Adverse	Minor (Not Significant)
Low Potential for Saxon Occupation	Local	High Adverse	Negligible (Not Significant)
Low Potential for Medieval Occupation	Local	High Adverse	Negligible (Not Significant)
High Potential for Post Medieval Occupation	Regional / Local	High Adverse	Minor/moderate (Not Significant)

MITIGATION AND MONITORING MEASURES

Demolition and Construction

12.47 When considering the potential for impacts to below ground heritage assets, archaeological fieldwork (trial trench evaluation) has been undertaken on site, as agreed with the LBS. The summary of the Evaluation Work and the full Evaluation Report can be found in **ES Volume 3 – Appendix: Archaeology**.

12.48 The mitigation strategy is preservation by record i.e. excavation. The details of the scope of the mitigations will be agreed in due course with LBS. It is anticipated the strategy will comprise a combination of boreholes and targeted areas of excavation. Where archaeological remains will be preserved by record, the analysis and reporting of the results of the archaeological works will occur off site, however the results will be published in a variety of technical and non- technical formats. It is anticipated that the archaeological aspects of the development can be secured by means of suitably worded planning conditions imposed on the planning permission for the Proposed Development.

12.49 It is considered that any residual effects of the Proposed Development will be **minor adverse - negligible** and so not significant.

RESIDUAL EFFECTS

12.50 The residual effects resulting from the Proposed Development are summarised in Table 12.6.

Table 12.6 Evaluation of Predicted Impacts and Effects - 2021 Proposed Development

Receptor	Receptor Importance	Residual Effect (Nature and Scale)	Effect Significance	Geo	D I	P T	St Mt Lt
Demolition and Construction							
Prehistoric remains	Local	Negligible	Not Significant	L	D	P	Lt
Roman remains	Local	Minor adverse	Not Significant	L	D	P	Lt
Saxon remains	Local	Negligible	Not Significant	L	D	P	Lt
Medieval remains	Local	Negligible	Not Significant	L	D	P	Lt
Post Medieval remains	Regional / Local	Negligible	Not Significant	L/R	D	P	Lt
Notes: Residual Effect - Scale = Negligible / Minor / Moderate / Major - Nature = Beneficial or Adverse Geo (Geographic Extent) = Local (L), Borough (B), Regional (R), National (N) D = Direct / I = Indirect P = Permanent / T = Temporary St = Short Term / Mt = Medium Term / Lt = Long Term N/A = not applicable / not assessed							

LIKELY SIGNIFICANT EFFECTS

- 12.51 The site does not contain any Scheduled Ancient Monuments and does not lie within a Designated Archaeological Area as defined in the Ancient Monuments and Archaeological Areas Act 1979. The site does not contain any listed buildings, but does lie within an Archaeological Priority Area, as defined by the LBS.
- 12.52 The archaeological assessment indicates that during the Prehistoric and Roman period the site lay towards the eastern end of a gravel island which lay on the eastern side of the Guy's Channel. A Roman and mediaeval settlement lay on the western bank of the Guy's Channel approximately 500m west of the site.
- 12.53 Archaeological and map evidence shows that in the Mediaeval period the site remained open, waterlogged ground until the 15th century. By the 16th century development along Bermondsey Street had reached the site. The site probably lies partially within the curtilage of a Tudor mansion.
- 12.54 Subsequently the site was redeveloped for industrial and domestic purposes, finally being occupied by warehouses, industrial buildings, houses and flats. The buildings were largely cleared in the 1980s with the exception of buildings in the south-west of the site.
- 12.55 The site has potential for providing information on the topographic and environmental development of north-east Southwark from the Prehistoric to Mediaeval periods. Deep water lain deposits are probably present. It is likely that traces of post mediaeval houses, warehouses, factories and workshops are also present beneath the site.
- 12.56 An archaeological evaluation has been undertaken across the site. Four trenches were dug and analysed.
- 12.57 The evaluation found natural sands in two of the trenches. The sand was sealed by alluvial deposits consistent with the gradual silting of Guy's Channel through the prehistoric to late medieval period.

COMPARISON OF EFFECTS

- 12.58 Evidence was seen for late-medieval to early post-medieval land reclamation, achieved by the dumping of material onto the alluvium to consolidate the ground. This allowed the site to be developed with dwellings and properties, including the suggestion of a Tudor period chalk wall in one of the trenches which had later been reconfigured and clearly stood for long enough to influence the alignment of a series of post-medieval tanning pits to the north.
- 12.59 A post-medieval ditch was seen in one of the trenches which is likely to be the same one shown on a historical map of 1682.
- 12.60 Significant change to the site occurred from the 1830s as St Thomas Street was created, and warehouse structures fronted the road, their foundations and basement levels visible in all trenches. The basement was seen to occupy a large area of the eastern side of the site; it was of varying depths but not deep enough to completely remove all archaeological evidence.
- 12.61 The groundworks necessary to provide the foundations of the Proposed Development will remove all remaining archaeological deposits. During the groundworks, an archaeologist will be present on site to monitor any archaeological finds and record these prior to their excavation. There are no archaeological features underground that are important enough to be preserved in the ground. On this basis, **no likely significant effects to archaeology are expected. The effects identified range from negligible to minor adverse and are not considered significant.**

CLIMATE CHANGE

- 12.62 Potential change to the future climate conditions is not expected to affect the archaeological potential within the site or impact on archaeological remains associated with the site, as any remains will have been preserved by record.

ASSESSMENT OF FUTURE ENVIRONMENT

Evolution of the Baseline Scenario

- 12.63 Currently, the heritage-rich baseline environment for archaeology in North Southwark has been attained through a progressive period of archaeological intervention over recent decades. One of the principle drivers in this process has been the significance of the location of the Roman settlement centred around Borough High Street and its subsequent growth in the medieval period. This is reflected in the extensive Archaeological Priority Zone (APZ) surrounding the development site. Even absent the Vinegar Yard development being brought forward, the evolution of the baseline environment in the future is likely to proceed at a similar pace based on a strong development market in this area so providing a high level of opportunity for archaeological intervention.
- 12.64 Within the site itself, should the Proposed Development not come forward, the existing baseline would have remained in situ.

CUMULATIVE EFFECTS ASSESSMENT

- 12.65 This section identifies the effects of the Proposed Development in combination with the effects of other cumulative schemes within the surrounding area (identified in **ES Chapter 2: EIA Methodology (Volume 1)**).
- Demolition and Construction**
- 12.66 The wider archaeological resource of the Study Area comprises buried archaeological remains which have accumulated as a result of human activity since the prehistoric period and the historic suburban and industrial development of the area since the 18th century.
- 12.67 It is reasonable to assume that the determination of planning applications for each cumulative development proposal will have been made by LBS in accordance with national, regional and local heritage planning policy and guidance, within which any archaeological remains would be a material consideration in the determination of the application and would have included the provision of appropriate archaeological mitigation measures, including the requirement for investigation and recording.
- 12.68 Furthermore, whilst cumulative developments beyond the boundary of the site may impact upon similar archaeological remains to those which occur at this site, they are not affecting the same archaeological remains, therefore direct cumulative effects would not occur.

Completed Development

- 12.69 There will be no cumulative effects on the archaeological resource once the Proposed Development has been completed and occupied.

- 12.70 **Table 12.7** below presents the residual effects of the 2018 Proposed Development to allow for a comparison with the residual effects of the 2021 Proposed Development (**Table 12.6**).

Table 12.7 Evaluation of Predicted Impacts and Effects - 2018 Proposed Development

Receptor	Receptor Importance	Residual Effect (Nature and Scale)	Effect Significance	Geo	D I	P T	St Mt Lt
Demolition and Construction							
Prehistoric remains	Local	Negligible	Not Significant	L	D	P	Lt
Roman remains	Local	Minor adverse	Not Significant	L	D	P	Lt
Saxon remains	Local	Negligible	Not Significant	L	D	P	Lt
Medieval remains	Local	Negligible	Not Significant	L	D	P	Lt
Post Medieval remains	Regional / Local	Negligible	Not Significant	L/R	D	P	Lt
Notes: Residual Effect - Scale = Negligible / Minor / Moderate / Major - Nature = Beneficial or Adverse Geo (Geographic Extent) = Local (L), Borough (B), Regional (R), National (N) D = Direct / I = Indirect P = Permanent / T = Temporary St = Short Term / Mt = Medium Term / Lt = Long Term N/A = not applicable / not assessed							

- 12.71 **Table 12.6** and **Table 12.7** demonstrates that the residual effects to archaeology remain consistent between the 2018 Proposed Development and the 2021 Proposed Development. No additional or different likely effects or likely significant effects have been identified as a result of the revised proposals.
- 12.72 In addition, no additional or different likely cumulative effects or likely significant cumulative effects relating to archaeology have been identified as a result of the 2021 Proposed Development coming forward alongside the cumulative schemes when considering the cumulative assessment undertaken in respect of the 2018 Proposed Development.

ANNEX A

LBS Review

Summary of Matter Raised in Scoping Opinion	Reference in the ES Chapter / Application Documentation
<p>Paragraph 1.73</p> <p>The wording of the SR with regard to the potential sensitive receptors (para. 287 - limiting the scope of these to Pleistocene and Holocene deposits and to post-medieval heritage assets) appears somewhat at odds with the detail given on the known archaeological context of the site in paragraph 53 which states that the site lies in an Archaeological Priority Area (APA) focused around Roman and later development in North Southwark. The assessment methodology described at paragraph 290 further states that the prehistoric to post-medieval development of the site will be considered as part of the baseline. The applicant is to ensure that all known archaeological remains or potential archaeological remains, regardless of period, are appropriately discussed within the ES and any potential impacts and effects clearly explained.</p>	<p>The scope of the research undertaken was agreed with LBS and included a study of all known heritage assets within the study area.</p> <p>The impacts have been fully assessed (see ES Chapter 12 Archaeology, Potential Effects).</p>
<p>Paragraph 1.74</p> <p>The applicant proposes a study area of 200m from the site boundary. The rationale for this study area is to be clearly explained within the ES. It is noted that the applicant proposes some consultation with LBS on archaeology and it is recommended that, as part of this consultation, the extent of the study area is explicitly agreed.</p>	<p>The scope of the study area was agreed with LBS (see <i>ES Volume 3 – Appendix: Archaeology</i>).</p>