**SECTION 77 OF THE TOWN AND COUNTRY PLANNING ACT   
1990 (AS AMENDED)**

**CALL IN INQUIRY INTO THE PROPOSED DEVELOPMENT OF THE UNITED KINGDOM HOLOCAUST MEMORIAL AND LEARNING CENTRE LOCATED WITHIN VICTORIA TOWER GARDENS, MILLBANK, LONDON SW1P 3YB**

**PROOF OF EVIDENCE OF ALAN FORD, BA (Hons), MCIfA**

**On behalf of**

**THE SECRETARY OF STATE FOR HOUSING COMMUNITIES AND LOCAL GOVERNMENT**

**TOWN AND COUNTRY PLANNING (INQUIRIES   
PROCEDURE) (ENGLAND) RULES 2000**

**V1 07/09/20**

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**B: UK Holocaust Memorial – Detailed Desk Based Assessment (Atkins, October 2019)**

**C: UK Holocaust Memorial, Victoria Tower Gardens SW1, City of Westminster – Report on an Archaeological Watching Brief (MoLA, June 2019)**

**D: UK Holocaust Memorial, Victoria Tower Gardens SW1, City of Westminster – Geoarchaeological Evaluation Report (MoLA, November 2019)**

**E: United Kingdom Holocaust Memorial – Archaeological Mitigation Strategy (Atkins, April 2020)**

## **1.0** **QUALIFICATIONS AND EXPERIENCE**

**Alan Ford will say:-**

* 1. I hold the degrees of Bachelor of Arts (with Honours) in Archaeology from the University of Nottingham (1988). I been a member of the Chartered Institute for Archaeology since 2011.
  2. I have 32 years of experience in the field of archaeology and heritage consultancy with over twenty of those years as a field archaeologist; my experience includes designing and delivering archaeological outputs for complex large scale infrastructure and other projects including on urban sites in London.
  3. I am a senior heritage consultant and lead archaeologist for Atkins, a leading global engineering and design consultancy. I have been responsible for the delivery of the archaeological assessment and evaluation programme for the Application Site since July 2018.
  4. I am familiar with the Application Site and the surrounding area having worked on this and a number of other projects in the locale.
  5. I have read all the relevant background information and have been assisted by the same colleagues who worked on the Application and made such enquiries as I consider to be necessary to fulfil my duties as an expert witness.
  6. I confirm that my evidence to this Inquiry has been prepared and is given in accordance with the guidance of my Professional Institutions and I confirm that the opinions expressed are my true and professional opinions.

1. **INTRODUCTION AND SCOPE OF EVIDENCE**
   1. I am instructed by the Secretary of State for Housing, Communities and Local Government (the "**Applicant**") in respect of proposals for the installation of the United Kingdom Holocaust Memorial and Learning Centre (the “**UKHMLC**”) within Victoria Tower Gardens, Millbank, London (the “**Site**”).
   2. No disputed matters, objections or representations have been made with regard to the archaeology within the Scheme footprint.
   3. I will be providing evidence merely on matters pertaining to the delivery of the archeological programme in support of construction of UKHMLC. This is divided into two parts as follows:

* Part 1 sets out the work undertaken to date, and the results thereof, with regards to archaeological assessment and evaluation to support the planning application for UKHMLC; it concludes with the archaeological planning condition;
* Part 2 outlines the archaeological mitigation strategy (AMS) to be delivered in tandem with and integral to the construction programme.

1. **ARCHAEOLOGICAL ASSESSMENT AND EVALUATION TO DATE**
   1. In this section I present a summary of the archaeological assessment and evaluation work undertaken to date alongside their findings.

**Archaeological Summary**

* 1. The Site lies within a Grade II Registered Park which contains four further listed structures: The Grade I Listed statue of the Burghers of Calais, the Grade II\* Listed Buxton Memorial, the Grade II Listed statue of Emmeline Pankhurst, and the Grade II Listed river embankment wall.
  2. The World Heritage of World Heritage Site of Westminster Palace, Westminster Abbey and St Margaret’s church is immediately to the north of the Site. The Scheduled Monument of the Jewel Tower is 45m north-west of the Site.
  3. The Site also lies within the Westminster Abbey and Parliament Square Conservation Area, and the Westminster and Thorney Island Archaeological Priority Area.
  4. Archaeological survival is expected to be high, as the site has remained open public space since the early 20th century. Archaeological features that may be affected by the Scheme comprise:
* Palaeoenvironmental remains within alluvial deposits associated with the Rivers Thames and Tyburn of Low to Medium significance;
* Evidence of early exploitation of the River Thames and River Tyburn, including jetties, boats etc. of most likely Low to Medium significance, but potentially up to High significance;
* Evidence of land reclamation from the 16th century onwards, including revetments, river-walls etc, of Low to Medium significance;
* Evidence of riverine industrial activity from the 16th century onwards, including wharves, docks etc, of Low to Medium significance;
* Garden features associated with the former layout of the late 19th to 20th century Grade II Registered Park, of Low significance.
  1. A staged programme of archaeological assessment and survey was undertaken to characterise the archaeological potential of the Site, to establish its likely significance, and predict any potential impacts to the archaeological resource deriving from delivery of the Scheme. This programme of archaeological assessment and survey was undertaken in consultation with Greater London Archaeological Advisory Service (GLAAS) and to written schemes of investigation (WSI) approved by them.
  2. A geophysical ground penetrating radar survey of the site was undertaken in 2017 (Appendix A) and has informed all subsequent archaeological reporting and fieldwork design.
  3. A detailed desk based assessment was then developed and reported on in April 2019 and further updated as the results of geoarchaeological investigations became available (Appendix B). This detailed desk based assessment utilised historic environment data, historic mapping, and historic images (including paintings), alongside published and unpublished archaeological reporting for the Westminster area to develop an understanding of the nature and significance of any archaeology likely to be encountered within the scheme footprint.
  4. This was followed by an initial phase of monitoring geotechnical test pits and assessing the logs from geoarchaeological boreholes carried out in April and June 2019 (Appendix C). The results of this informed a subsequent programme of purposive geoarchaeological sampling reported on in October 2019 to date the alluvial sequence and create a sub-surface deposit model (Appendix D).
  5. The presence of a palaeochannel containing organic alluvial deposits, potentially a former mouth of the River Tyburn, was identified in the southern portion of the Scheme footprint. Carbon dating of organic alluvial deposits within this showed that its formation predated the early Neolithic period and could therefore be a rare example of very early Holocene deposition in this part of London.
  6. From the Neolithic through to latter Romano-British period the deposition largely indicates an active fluvial and tidal environment with limited archaeological potential. Organic deposition was again identified towards the top of the surviving alluvial sequence and carbon dated to the mid to late Saxon period alongside palaeoenvironmental evidence for nearby human activity. The alluvial sequence on the site appears to have been truncated above this, the exact mechanism for which presently remains unknown, whether through tidal scour or truncation during reclamation of the riverside.
  7. From the desk based mapping exercise it is evident that the remains of features associated with both the former medieval Abbot’s Mill and medieval to early post medieval Queen’s Slaughterhouse (and any other remains directly associated with the medieval Palace and Abbey at Westminster) lie outside of and to the north-west of the scheme footprint.
  8. No evidence for anything other than post-medieval land reclamation and subsequent development and re-development of riverside wharfs and associated features and industry has been identified overlying the alluvium within the scheme footprint. The buried remains of this form of development are not unique in London, but are nevertheless, given their probable association with the development of the suburbs around Westminster from the 17th century onwards, and their likely excellent state of survival and complexity, of such significance that they will require detailed archaeological investigation before their removal.
  9. The evidence for post medieval reclamation and development of the area within Victoria Tower Gardens is uniformly sealed by c. 1.2m of homogeneous topsoil, imported onto the site during creation of the current park in the late 19th to early 20th centuries. No buried features atypical of the creation of a late 19th to early 20th century municipal park or features established by any notable park designers/architects have been identified within the park from historic mapping, documentary sources or historic photographs. The park archaeology within the scheme footprint is therefore considered to be of low significance and can largely be re-created from the documentary record alone.

**Archaeological Condition**

* 1. The results of the surveys and archaeological investigations to date indicated to GLAAS that the balance of probability is that there are no archaeological remains of such significance to be a constraint on construction of the UKHM and that, with implementation of an appropriate archaeological programme, the archaeological on the Site can be ameliorated by record. A draft archaeological condition to be set on any planning consent has therefore been proposed. This states:

### *No development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing.  No groundworks shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and*

### *A.  The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works*

### *B.  Details of a programme for delivering related positive public benefits*

### *C. A method statement for protecting buried remains outside the basement footprint during the construction period*

### *D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI*

### *Informative*

### *The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England’s Guidelines for Archaeological Projects in Greater London. It should include a contingency arrangement in case of the unexpected discovery of archaeological remains of national significance. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.*

1. **ARCHAEOLOGICAL MITIGATION STRATEGY**

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* 1. As the first stage of satisfying the draft condition for archaeology an archaeological mitigation strategy (AMS) has been designed. The AMS was designed in consultation with GLAAS and has been subject to peer review by a panel of experts in the archaeology of Westminster.
  2. The purpose of the Archaeological Mitigation Strategy (AMS) is to set out the strategy for the planning and delivery of a programme of archaeological mitigation within the Scheme footprint required for the delivery of construction of the Scheme.
  3. The archaeological mitigation will comprise a programme of investigative archaeological fieldwork with associated post excavation assessment, analysis, updated project design and final reporting and publication. It also outlines delivery of an associated public outreach programme during the archaeological fieldwork and reporting phases.
  4. This AMS is a high-level framework document to provide an archaeological strategy for how the archaeology within the footprint of the Scheme will be approached. Detailed methodologies for individual investigations delivered under the umbrella of the AMS will be delivered within the Written Scheme of Investigation (WSI) produced by the contracting archaeological unit(s) appointed to the works by the Client and agreed with GLAAS.
  5. The AMS:
* describes the archaeological background within which the Scheme is being developed; this will include reference to any relevant and appropriate archaeological research frameworks;
* establishes the roles, responsibilities and consultative procedures required to successfully deliver the protocols established by the AMS;
* describes the engineering processes which the archaeological programme for the Scheme will be delivered alongside;
* outlines the key research themes and objectives which will steer the archaeological programme and against which its results can be quantified;
* establishes the archaeological toolkit of methodologies that will be applied to achieve the objectives of the archaeological programme for the Scheme;
* establishes the post excavation, archival, reporting, publication and outreach processes that will be followed in delivering the archaeological programme for the Scheme.

1. **CONCLUSIONS**
   1. The evidence set out above, and presented in the Archaeological Addendum, demonstrates that all matters pertaining to the archaeology within the Scheme footprint have been dealt with to the satisfaction of GLAAS, archaeological advisors to WCC. No objections or representations have been raised with regard to archaeology by Rule 6 parties, and there are no reasons outstanding to deny planning permission for the proposed UKHMLC on archaeological grounds.