



Historic England

Ms Elaine Quigley  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

Your Ref: 2023/1848/P  
Our Ref: 214804

Contact: Sandy Kidd  
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22 November 2023

Dear Ms Quigley,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2021**

**British Museum Great Russell Street London WC1E 7JW**

*Erection of new two storey building, plus basement and associated works to provide plant and welfare accommodation ancillary to the Museum following demolition of existing building and two storey structures on East Road (to the rear of 9-11 Montague Street and 43 Russell Square).*

**Recommend Archaeology Condition**

Thank you for your consultation on the desk-based assessment received on 24<sup>th</sup> October 2023.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

**Assessment of Significance and Impact**

The updated archaeological desk-based assessment is helpful in clarifying the archaeological impact of the development. As noted previously, the site's principal archaeological interest lies in its location in relation to London's English Civil War



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defences. Control of London and its riches was a decisive factor in the eventual victory of Parliament over the Royalist cause. To protect this valuable asset Parliament constructed an extensive circuit of forts linked by earthworks (the 'lines of communication'). After the Civil War and Restoration knowledge of these fortifications and their physical remains was obscured or lost. Recent archaeological and historical research, including excavations at the British Museum itself, are shedding new light on the location, layout and form of the defences and the wider 'landscape of war' around them.

The British Museum lies immediately west of the site of Southampton Fort, one of the larger forts of the circuit, and was crossed by the lines of communication. The PCA desk-based assessment presents one interpretation of the location of the lines of communication running a short distance to the north of the application site. An alternative interpretation is emerging from research commissioned by Historic England which suggests the lines ran a few meters south of the application site. Regardless of which option one prefers the application site lies next to a major Civil War fort and in an area of known defensive works of that period. It is very likely to have been affected by construction of defences and so may contain structures and artefacts related to them.

Before the Civil War the site appears to have had only sporadic low level use but after it became part of the grounds of Montague House and gardens fronting on to Montague Street. Observation of test pits indicate that post-medieval/modern remains related to these uses will survive.

The proposed development would remove all surviving remains within the basement footprint but bearing in mind the large-scale of the Civil War fortifications and relatively small-scale of the proposed development I am satisfied that this only amounts to a low level of harm to their overall significance which could be satisfactorily mitigated by a condition for archaeological investigation.

### Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.



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If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

### Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

I therefore recommend attaching a condition as follows:

- Condition      No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development 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. Where appropriate, details of a programme for delivering related positive public benefits
  - C. 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. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.

I envisage that the archaeological fieldwork would comprise the following:



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## Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

The new basement footprint will require full excavation with appropriate investigation of other groundworks.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations.

Yours sincerely

**Sandy Kidd**

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



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