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Ms Elaine Quigley

London Borough of Camden
5 Pancras Square
London
N1C 4AG

Your Ref: 2023/4648/P

Our Ref: 217728

Contact: Sandy Kidd

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2023-12-06

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 energy centre incorporating maintenance support accommodation to internal West Road, new substation off Montague Street, all together with associated internal and external works, service runs, erection of plant, landscaping, and temporary works associated with construction following demolition of existing Energy Centre to internal West Road and removal of temporary buildings to the south of the existing energy centre on the internal West Road and to the north and east of the White Wing facing Montague Street.*

**Recommend Archaeology Condition(s)**

Thank you for your consultation received on 2023-11-17.

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 planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [78218] London Suburbs

The archaeological desk-based assessment is helpful in clarifying the archaeological impact of the development.  The British Museum lies on London's Civil War Defences: immediately west of the site of Southampton Fort, one of the larger forts of the circuit, and it was crossed by the lines of communication - a trench earthwork which linked the forts.   The PCA desk-based assessment presents one interpretation of the location of the lines of communication running across the north of the BM site whilst an alternative interpretation is emerging from research commissioned by Historic England which suggests the lines through the middle of the BM, but still somewhat to the north of the application site.   Regardless of which option one prefers the application site lies next to a major Civil War fort just behind known defensive works of that period.   It is 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 Montagu House.   The map regression study shows that the two sites lay in areas of garden and outbuildings rather than on Montagu House itself.  Observaion of test pits indicate that post-medieval/modern remains related to these uses could survive.

The impact of the proposed development will depend on the details of groundworks in relation to archaeological levels which will need clarifying but without basements there may be scope to preserve buried remains in-situ, especially under the ISS.   Overall I am satisfied that the development is only likely to cause a low level of harm to the overall significance of these assets which could be satisfactorily mitigated by a condition for archaeological investigation.

The application contains no reference to new service trenches which if required may also merit archaeological mititigation.

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.

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

1. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
2. Where appropriate, details of a programme for delivering related positive public benefits
3. 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:

**Watching Brief**

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

A programme of archaeological monitoring of groundworks will be needed with sensitive works subject to a controlled 'strip, map and sample' approach.

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

This response relates solely to archaeological considerations. If necessary, Historic England’s Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

**Sandy Kidd**

Archaeology Adviser

Greater London Archaeological Advisory Service

London and South East Region