



Historic England

Mr David Fowler  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

Your Ref: 2024/1438/P  
Our Ref: 222901

Contact: Greer Dewdney  
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21 August 2024

Dear Mr Fowler,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2023**

**Juniper Crescent London NW1**

*Request for scoping opinion under Paragraph 4, Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving delivering a significant number of homes.*

**Recommend Archaeology Condition(s)**

Thank you for your consultation received on 15 August 2024.

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: [77211] Regents Canal and Rail Infrastructure

I welcome the submission of the archaeological desk-based assessment with the EIA scoping



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report. Having reviewed the submitted assessment I am happy to agree that there is unlikely to be an archaeological impact of high significance at this location and that archaeology can be scoped out of the forthcoming EIA.

The site retains a potential to yield archaeological remains of the historical industrial development of Camden Goods yard. I therefore recommend that should planning be eventually granted for this site, an archaeological condition should be applied to the consented scheme.

I concur with the conclusions of the submitted assessment that an archaeological watching brief would be appropriate.

Heritage can also provide an opportunity for public engagement, and I would recommend that the applicant consider reflecting the site's industrial heritage within the development scheme. NPPF paragraphs 196 and 199 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.

#### 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 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 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 211 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
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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 211.

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.

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.



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Yours sincerely

**Greer Dewdney**

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



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