

## **6.6 Archaeology**

- 6.6.1 Chapter 11 of the 2022 ES reported the likely significant archaeological effects of the 2023 Consent on existing buried heritage assets during the construction and operational phase. Where appropriate, it also identified proposed mitigation measures to prevent, minimise or control likely negative effects arising from the development and the subsequent anticipated residual effects.
- 6.6.2 This Chapter has been prepared in order to outline the key changes in relation to the 2023 Consent, and to identify changes to the findings and conclusions regarding archaeology associated with the 2022 ES.
- 6.6.3 An updated Desk-based Assessment can be found in **Appendix 6.6.1**.

### **Legislation, Planning Policy and Guidance**

- 6.6.4 A review of UK legislation, planning policy and guidance relevant to the proposals was previously undertaken as part of the 2022 ES.

### **Planning Policy Context**

#### **National**

- 6.6.5 The following national level policy and guidance documents are of relevance to the Proposed Development:

*National Planning Policy Framework (2024)*

- 6.6.6 An updated National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities & Local Government on the 12th December 2024. It sets out the government's planning policies for England and how these are expected to be applied. This revised framework replaces the previous version of the NPPF dated December 2023.
- 6.6.7 This revision changed the paragraph numbers but included no material changes in policy or approach relating to archaeology.

*National Planning Practice Guidance (NPPG) (2019)*

- 6.6.8 There has been no change to Department of Communities and Local Government (2019) Conserving and Enhancing the Historic Environment: Planning Practice Guidance (PPG).

#### **Regional**

*London Plan 2021*

- 6.6.9 There has been no change to the Greater London Authority: London Plan (2021). Policy HC1 "Heritage conservation and growth" of the London Plan where it relates to London's historic environment.

*Sustainable Design and Construction Supplementary Planning Guidance (2014)*

6.6.10 There has been no change to Sections 2.2.23 and 2.2.24 in the Sustainable Design and Construction SPG regarding heritage assets and archaeology.

**Local**

*London Borough of Camden Local Plan (2017)*

6.6.11 Policy D2 of the Camden Local Plan (2017) covers archaeology, other heritage assets and non-designated heritage assets.

*Regulation 18 Consultation Draft Camden Local Plan (2024)*

6.6.12 Camden Council is in the process of updating the Local Plan. The emerging Camden Local Plan is currently in its consultation stage. The Regulation 18 consultation took place in early 2024. Further consultation is anticipated in 2025, with adoption currently anticipated in Spring 2026. At this stage in the plan preparation process, the draft Local Plan policies carry limited weight. However, these will start to carry more weight as the plan moves towards adoption and so have been considered within the application documentation. Archaeology, other heritage assets and non-designated heritage assets will be covered under Policy D5 rather than D2, but the wording does not change.

**Guidance**

6.6.13 The Chartered Institute for Archaeologists (2020) Standards and guidance for historic environment desk-based assessment has not changed.

6.6.14 The Institute of Environmental Management and Assessment (2021) guidance for good practice in cultural heritage impact assessment has not changed.

6.6.15 The relevant sections of the planning policies are provided in full in **Appendix 6.6.1**.

**Scheme Changes**

6.6.16 The changes included in the Proposed Development relate to Development Plots N3E, N4 and N5, and the associated landscaping, access roads and infrastructure. The Outline Elements of the 2023 Consent will be unaffected by the proposed changes except for a reduction in the maximum residential floor area proposed.

6.6.17 The only proposed amendments that would have the potential to produce changes to the impact on archaeology are as follows:

- Additional height to a number of the blocks; and
- Reconfiguration of N4 and N5 for improved design rationalisation, leading to a smaller N4 building footprint and removal of N4D.

## **Assessment Methodology and Significance Criteria**

6.6.18 The following section outlines the methodologies applied to identify and assess the potential impacts and likely effects to result from the Proposed Development.

### **Extent of The Study Area**

6.6.19 There has been no change in the extent of the Study Area from the 2022 ES Chapter.

### **Method of Baseline Collection**

6.6.20 There has been no change in the method of baseline collection from the 2022 ES Chapter.

### **Method of Assessment**

#### *Demolition & Construction Phase*

6.6.21 There has been no change in the method of assessment from the 2022 ES Chapter.

#### *Operational Phase*

6.6.22 There has been no change in the method of assessment from the 2022 ES Chapter. Therefore, assessment of the operational phase is still scoped out.

### **Significance Criteria**

6.6.23 There has been no change in the method of assessment Significance Criteria from the 2022 ES Chapter.

### **Consultation**

6.6.24 Given that the Proposed Development introduces no new or additional impacts on archaeology, no further consultation has been undertaken.

## **Assessment of Effects, Mitigation and Residual Effects**

### **Demolition & Construction Phase**

6.6.25 This section identifies and assesses the scale and nature of the main effects arising from the Proposed Development during the construction phase.

#### Piles/Excavation

6.6.26 The 2022 ES considered that only piling and basement excavation would have an impact on archaeology, and that they would have only a minor negative effect (not significant). Given that the Proposed Development introduces no new impacts save for the specific location and density of the impact, it is considered that the Proposed Development does not change the conclusions on effects as set out in the 2022 ES.

#### Mitigation

6.6.27 It was agreed with GLAAS in 2022, that no further archaeological investigation is necessary. Given that the Proposed Development introduces no new effects or increase to the effects, there would be no change in the recommended mitigation.

#### Residual Effect

6.6.1 There is no change in the Residual Effects from the 2022 ES Chapter.

### **Operational Phase**

6.6.2 An assessment of the operational phase is still scoped out, since there is no change to the effects to archaeological remains during the operational phase.

### **Severability**

6.6.3 The updated severability plan shows the extent of the severable area within Plot S8 within the Outline Element West. It is the applicants' firm intention to deliver this plot in accordance with the approved parameter plans through the submission of reserved matters pursuant to the hybrid planning permission. This will maximise the public benefits that will result from the development. However, it is recognised that an extant planning permission (ref PWX0202103), together with an extant section 73 permission (ref. 2023/1292/P), (collectively the "Builder's Merchant Scheme") exist in relation to this part of the Site, and as a consequence this area has been identified as severable. In order to ensure a robust approach, an assessment has been made of the environmental impacts that would potentially arise in the event that the Builder's Merchant Scheme is brought forward under those existing extant planning permissions rather than pursuant to reserved matters under the hybrid consent.

6.6.4 In regard to archaeology, the severance of the relevant area of Plot S8 would have no impact, on the basis that the impacts assessed for the construction of Plot S8 as part of the 2023 Consent were the same as impacts anticipated across the rest of the 2023 Consent. Thus, the severance of this area of the Site does not change the overall effects of the Proposed Development, nor would the coming forward of the Builder's Merchant Scheme on that land.

**Limitation and Assumptions**

6.6.5 There is no change in the limitations and assumptions from the 2022 ES Chapter.

**Summary & Conclusions**

6.6.6 The changes associated with the Proposed development do not change the summary and conclusions set out in 2022 ES.

6.6.7 Given that there were no conditions concerning archaeology attached to the granting of the 2023 Consent and the Proposed Development (including the effect of the severability of the relevant area of Plot S8) introduces no new or additional impacts, no new conditions are anticipated concerning archaeology.

## References

Ministry of Housing, Communities and Local Government, 2024. National Planning Policy Framework.

Department of Communities and Local Government, March 2019. Conserving and Enhancing the Historic Environment: Planning Practice Guide, 2019.

Greater London Authority, 2021. The London Plan: The Spatial Development Strategy for Greater London formally published 2nd March 2021.

Greater London Authority, 2014. Sustainable Design and Construction Supplementary planning Guidance 2014.

London Borough of Camden, 2017. Adopted Camden Local Plan, 2017.

Chartered Institute for Archaeologists, 2020. Standards and guidance for historic environment desk-based assessment, Published December 2014, updated January 2017 and October 2020.

Institute for The Institute of Environmental Management and Assessment, 2021. Principles of Cultural Heritage Impact Assessment in the UK 2021.