



ENGLISH HERITAGE

Development Management
London Borough of Camden

Your Ref: 2013/3807/P
Our Ref: CLO11604
Contact: Sandy Kidd
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07 August 2013

f.a.o. Richard McEllistrum

Dear Sir/Madam,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) NATIONAL PLANNING POLICY FRAMEWORK 2012

Land bounded by Phoenix Place and Mount Pleasant

Comprehensive redevelopment, following the demolition of existing buildings, to construct four new buildings ranging from 5 to 15 storeys (above basement level) in height, to provide 38,724 sqm (GIA) of residential floorspace (345 dwellings) (Class C3), 823 sqm (GIA) of flexible retail and community floorspace (Use Classes A1, A2, A3, D1 or D2), with associated energy centre, waste and storage areas, basement level residential car parking (54 spaces), the re-provision of Royal Mail staff car parking (approx 196 spaces) cycle parking, residential cycle parking (431 residential spaces) hard and soft landscaping to provide public and private areas of open space, alterations to the public highway and all other necessary excavation and enabling works. The application is accompanied by an Environmental Statement.

Recommend Pre-Determination Archaeological Assessment/Evaluation

The above planning application has been noted by the Greater London Archaeological Advisory Service (GLAAS) as potentially affecting a heritage asset of archaeological interest.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision.

Appraisal of this planning application using the Greater London Historic Environment Record and information submitted with the application indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest as the Environmental Statement's treatment of archaeology requires some clarification. Firstly, potential for remains of London's English Civil

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War Defences is not considered – whilst the precise alignment of these defences is not known, information on the GLHER indicates that they probably ran close to or through the site. Secondly, the ES recognises that the Phoenix Place Site's has a high potential for palaeo-environmental riverine deposits but there has been no field evaluation to test and map that potential. This should be done in consultation with our Regional Science Advisor (Sylvia Warman), and the possibility of associated archaeological features acknowledged. The likely archaeological potential and impact of development probably varies across the site and such variation should be mapped for clarity and precision. The ES proposals for mitigation should then be reviewed with GLAAS in the light of the above information.

I therefore recommend that the applicant be asked to review and revise their archaeological assessment and undertake a field evaluation before the application is determined.

The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation.

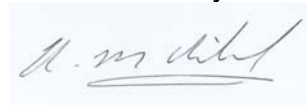
If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development. If planning permission is to be refused without the provision of a satisfactory archaeological assessment/evaluation then we recommend that the failure of the applicant to provide an adequate archaeological assessment be cited as a reason for refusal.

For your information, similar advice has been given on the adjacent Calthorpe Street Site in Islington.

Further information on archaeology and planning in Greater London is available at: <http://www.english-heritage.org.uk/professional/advice/our-planning-role/greater-london-archaeology-advisory-service/about-glaas/>

Please note that this response relates solely to archaeological considerations. If necessary my Inspector of Historic Buildings and Areas colleagues should be consulted separately regarding statutory matters or Borough Conservation Officer as appropriate.

Yours sincerely



Sandy Kidd
Principal Archaeology Advisor
National Planning & Conservation: London



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