



Historic England

Ms Jenna Litherland
London Borough of Camden

Our ref: CLO18234
Your ref: 2015/6018/P

Telephone 0207- 9733215
Email sandy.kidd@HistoricEngland.org.uk

18 November 2015

Dear Ms Litherland

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

Coal Drops Yard, Stable Street, King's Cross Central, London, N1C 4AB

Reserved matters in connection with the refurbishment of the 16 Western Wharf Road Arches and the southern 5 bays of the Eastern Coal Drops and its adjacent viaduct within Development Zones I and M for retail uses within Use Classes A1, A2, A3 and/or A4 together with hard landscaping within the Coal Drops Yard. Matters addressed by this submission entail associated details in compliance with condition nos. 3, 9, 10, 14, 16-24, 27-28, 31, 33-39, 42-43, 45-46, 48-49, 51, 56, 57, 60, 62, and 64-67 of the outline planning permission for a comprehensive, phased, mixed-use development of former railway lands within the Kings Cross Opportunity Area (2004/2307/P) granted subject to section 106 legal agreement on 22 December 2006).

Recommend amendment to submitted archaeological written scheme of investigation

Thank you for your consultation dated 30/10/2015.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

Having considered the submitted archaeological written scheme of investigation I am satisfied that it adequately provides for mitigation of below-ground archaeological impact but am concerned that it does not cover the possibility of new discoveries during conversion of the historic buildings and structures. The Heritage Statement provides a detailed description of the built heritage recognising the complexity of their construction, development and use. Further details could be revealed which might add to this analysis, or



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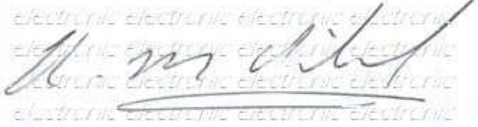
be worthy of retention for their historical illustrative value. I would therefore recommend further consideration of this issue; and appropriate amendment of the WSI to include a targeted watching brief on interventions into the historic fabric.

The archaeological condition (56) will not be fully satisfied until all works are complete and any post-excavation assessment/analysis leading to publication has been agreed. Results from this phase of work should inform subsequent site-wide publication which will need to be integrated with analysis of the built heritage and historical records – this should be made clearer in section 3.5.

Once a revised written scheme is approved, the start date when known should be communicated by the archaeological practice to me. I will conduct monitoring visits on your behalf.

Please do not hesitate to contact me should you require further information. This response relates solely to archaeological issues. Further information on archaeology and planning in Greater London is available on the Historic England website

Yours sincerely



The image shows a handwritten signature in black ink, which appears to read 'Sandy Kidd'. The signature is written over a light blue background that has a repeating pattern of the word 'electronic' in a small, light font.

Sandy Kidd MA MCifA MRTPI
Principal Archaeology Advisor (GLAAS)
Planning Group: London



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

Coal Drops Yard, Stable Street, King's Cross Central, London, N1C 4AB

Internal and external alterations associated with the refurbishment of the Western Coal Drops and the northern 20 bays of the Eastern Coal Drops with their adjacent viaducts and the erection of a new roof level extension spanning between the Eastern and Western Coal Drops and new single storey shop units along Lower Stable Street, together with works to create means of access and circulation, hard landscaping, servicing, cycle parking and cycle facilities, for retail uses within Use Classes A1, A2, A3 and/or A4.

Thank you for your consultation dated 30/10/2015.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

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 submit 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. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.



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Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application (the Heritage Statement and Archaeological Written Scheme of Investigation) indicates that the development is likely to cause some harm to archaeological interest related to the site's industrial heritage but not sufficient to justify refusal of planning permission provided that a condition is applied to require an investigation to be undertaken to advance understanding.

The archaeological interest relates to both the above-ground historic structures and below ground remains. Having considered the submitted archaeological written scheme of investigation I am satisfied that it adequately provides for mitigation of below-ground archaeological impact but am concerned that it does not cover the possibility of new discoveries during conversion of the historic buildings and structures. The Heritage Statement provides a detailed description of the built heritage recognising the complexity of their construction, development and use. Further details could be revealed which might add to this analysis, or be worthy of retention for their historical illustrative value. I would therefore recommend further consideration of this issue; and appropriate amendment of the WSI to include a targeted watching brief on interventions into the historic fabric.

The archaeological condition (56) will not be fully satisfied until all works are complete and any post-excavation assessment/analysis leading to publication has been agreed. Results from this phase of work should inform subsequent site-wide publication which will need to be integrated with analysis of the built heritage and historical records – this should be made clearer in section 3.5.

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. 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 should provide for a watching brief on both above and below-ground works which may reveal or cause harm to features of interest. It 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.



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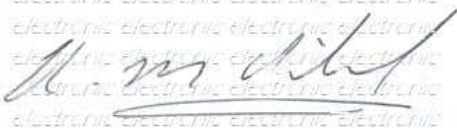
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Further information on archaeology and planning in Greater London including Archaeological Priority Areas is available on the Historic England website.

Please do not hesitate to contact me should you require further information or assistance. I would be grateful to be kept informed of the progress of this application.

Please note that this response relates solely to archaeological considerations. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

Yours sincerely



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