

Dear Mrs Haji-Ismail,

I am writing in relation to application 2016/2313/P, details required by condition 21 (ground investigation) of planning permission 2013/5947/P dated 18/06/14 and variation 2015/3151/P dated July 2015 for the redevelopment of the Greenwood Centre. The application states that you gave pre-application advice in March.

(Strangely, the existing and proposed land use is "All Others eg. adverts, aods, telecoms etc." where this is for a large housing and community centre development. It is also regrettable that applications 2013/5947/P, 2015/3151/P and 2016/2313/P are placed on entirely different web site pages.)

I am concerned with (a) the adequacy of information provided (b) the relevance and importance in support of Condition 24 which requires a full archaeological evaluation and Council-approved report before ground works commence.

**(a) adequacy of the information.**

The application 2016/2313/P by PCKO architects provides the Campbell Reith report ('for London Borough of Camden') dated April 2015, and the Ground Investigation Specification (stated 'Confidential') dated December 2015 and seeking tenders by 14 January 2016. Why Tenders for a Report that was completed in April 2015 - is it to include the further works stated in 12.10.1?

The 2015 Report states "The site is considered to have a Low sensitivity with respect to hydrology." I disagree.

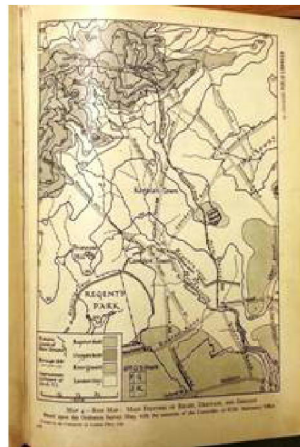
Section 8 describes a full Site Investigation was undertaken in 2013 including two percussive boreholes and five dynamic continuous sampler holes. [Please can you investigate why are these investigations from three years ago are not yet made publicly and freely available on the BGS web pages?]

In these -

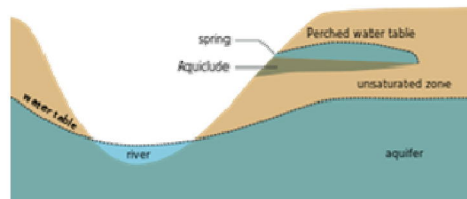
- Alluvial deposits (10.3.1) were found of 'very soft grey slightly gravelly sandy organic clay' with 'very sandy gravel' beneath;
- Ground water was found at the interface between the London Clay and the made ground between 1.5 and 4.5m bgl.

Table 5.2 states that 'It is believed [the Fleet] has been culverted and diverted off site' but better evidence could be provided on the course of the river. It also says: 'Perched water above the London Clay, associated with the former tributary of the River Fleet, may be present', while Table 5.3 states 'Superficial aquifer on site: None shown on the hydrogeological map'.

Dr Elizabeth Cooke's 1931 map of Camden's river geography s shows the Highgate branch as the main river, from Highgate hills, not a 'tributary'. It is also unclear why this is only 'perched water' - which would place it in the unsaturated zone:



Camden geography (1931)



Wikipedia -

'Water table'

The 2013 boreholes identified that Fleet ground water lies in gravels above the impermeable clay - from 1.5 to 4.5m bgl - see Section 8.2.2.

The 2015 report recommends 'Additional consultations with Thames Water to determine the site of sewers' (including the storm relief sewer). Where is the result of this consultation? Although Thames Water is not responsible for the Fleet outside sewers, data are needed to determine how far the sewers take the ground water of the Fleet below the Highgate pools.

**(b) Support for Archaeological Evaluation - Condition 22 of 2013/5947/P**

The Specification December 2015 says '**S1.8.8 Archaeological remains (Clause 3.7.5)**' but gives no further information.

The Report April 2015 section 12.9.3. says 'Any relic foundations or other subterranean structures beneath the footprint of the proposed buildings should be fully grubbed out ...

surveyed and backfilled with granular fill'. Does this adequately protect the archaeological investigation?

A desk-based archaeological assessment was made in 2013, and an Historic Environment Assessment addendum report by MOLA in 2015 identified "excavation of c 5.7m below ground floor level for ... the proposed pool and lift pit". It continued: "The depth of below ground disturbance in the form of basement excavations and foundations in the existing proposal would entirely remove any archaeological remains across much of the site."

English Heritage in 2013 recommended a full two-stage archaeological evaluation and this was put as Condition 22 for the approved scheme in 2013. As yet there has been no public presentation of a tender, work or Historic England response on Camden's web pages.

Greenwood Place is within Kentish Town Archaeological Priority Area. Kentish Town was built along the River Fleet because it gave fresh water from springs. The Fleet was only culverted in Kentish Town in the 1850s when built over. The Fleet flowed under Highgate Road from north to south just at Greenwood Place (probably housing was not built there originally because of their poor nineteenth century foundations).

The gravel and water in the boreholes below 'made ground' have potential pre-historic significance. Fossils (hippopotamus, elephant) from the Palaeolithic period have been found in the gravels of the north bank of the Fleet at Camden Road. Palaeolithic assessment, including dating the gravels and shells, should be a part of the archaeological evaluation.

Historic England stated as a Condition for approval: "No development (excluding demolition and enabling works) shall take place on i) the community centre; and ii) the residential building; until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological evaluation in accordance with a written scheme which has been submitted by the applicant and approved by the local

planning authority in writing and a report on that evaluation has been submitted to the local planning authority.”

Historic England are awaiting advice on the intention of the archaeological evaluation. Application 2016/2313/P for Condition 21, sampling for contaminants, should be linked with Condition 24, investigations for Palaeolithic potential, to fulfil the contract 'S1.8.8 Archaeological remains (Clause 3.7.5)'.

Mark McCarthy  
South Kentish Town Conservation Area