



Historic England

Ms Elaine Quigley
London Borough of Camden
Town Hall,
Camden Town Hall Extension,
Argyle Street,
Camden,
London,
WC1H 8ND

Our ref: CLO21932
Your ref: 2015/7028/P

Telephone 0207 973 3242
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24 November 2016

Dear Ms Quigley

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

8 & 10 Stukeley Street London WC2 5LQ

Replacement and erection of mansard roof extensions, excavation of a single storey basement extension to create new commercial (B1c) and residential floorspace at basement and ground floor levels, alterations to the principal and rear elevations, first floor rear extension, creation of a first floor rear terrace and new A/C unit.

Recommend Archaeological Condition(s)

Thank you for your consultation received on 17 November 2016.

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



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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.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: London Suburbs.

It is evident from the submitted Archaeological Desk-Based Assessment (PCA, October 2015), that due to the lack of an existing or possibly earlier basement, there is likely to be a good survival of deposits within the site which could be of some archaeological interest. The main potential would be for post-medieval remains however there is substantial evidence of Roman occupation to the east towards Holborn, and Saxon occupation to the south around Covent Garden and the Strand.

The proposed development includes a new basement across the entire footprint of the site. This would result in a total loss of archaeological remains from within the site.

Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a two stage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. The archaeological interest should therefore be conserved by attaching a condition as follows:

- Condition No demolition or development shall take place until a stage 1 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, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.
- If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:
- A. The statement of significance and research objectives, 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



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of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably qualified 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.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

The evaluation would form the first stage of archaeological investigation and would aim to inform the scope of archaeological works for the second stage of investigation.

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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Laura O'Gorman
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Planning Group: London



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