



Historic England

Ms Seonaid Carr
London Borough of Camden
Town Hall,
Camden Town Hall Extension,
Argyle Street,
Camden,
London,
WC1H 8ND

Your Ref: 2016/7026/P
Our Ref: CLO22263
Contact: Joanna Taylor
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10 January 2017

Dear Ms Carr

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

1 Fisher Street and 8 - 10 Southampton Row, London, WC1B 4AE

Request for scoping opinion under the Town and Country Planning (EIA) regulations for the redevelopment of the existing building and construction of a rear extension to create 130 bedroom hotel with ancillary restaurant and bar.

Recommend Pre-Determination Archaeological Assessment/Evaluation

Thank you for your consultation received on 21 December 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 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.



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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.

The planning application lies in an area of archaeological interest, Archaeological Priority Area – London Suburbs. The 'Environmental Scoping Report' submitted with the planning application found that:

4.2 Given the scale of the Proposed Development, the scope of the Environmental Impact Assessment (as above) is considered to be proportionate and ensures that the focus of the assessment is on the key issues associated with the Proposed Development. This approach to the EIA is in line with the planning practice guidance for EIA (paragraph ID-4-033-20140306) which states that the "Environmental Statement should be proportionate and not be any longer than is necessary to assess properly those effects". Nevertheless, any future application will be supported by the following assessments which will cover the following (outside the scope of the EIA). They include:

- Archaeological Desk Based Assessment (DBA): this will provide an overview of the potential impact on archaeological (below ground) features based on documents that are publically sourced, in consultation with the Council and other statutory bodies. Given that the front part of the Site is already developed and the rear of the Site is the Crossrail access shaft, the potential to disturb below ground artefacts is low. For this reason, it is not included with the ES but as the Site is located in an Archaeological Priority Area a DBA will be undertaken' (GL Hearn 2016).*

Our office are in agreement with these findings and I therefore recommend that the following further studies should be undertaken separately to the EIA to inform the preparation of proposals and accompany a planning application:

Desk Based Assessment

Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures.

The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer appointed archaeological practice before any decision on the planning application is taken. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development. Once the archaeological impact of the proposal has been defined a recommendation will be made by GLAAS.



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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 a planning decision is to be taken without the provision of sufficient archaeological information then we recommend that the failure of the applicant to provide adequate archaeological information be cited as a reason for refusal.

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

Please note that this advice 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



Joanna Taylor

Archaeology Advisor

Greater London Archaeological Advisory Service

Planning Group: London



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