



Historic England

Mrs Rachel English
London Borough of Camden
Town Hall,
Camden Town Hall Extension,
Argyle Street,
Camden,
London,
WC1H 8ND

Your Ref: 2019/1724/P
Our Ref: CLO28940
Contact: Laura O'Gorman
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14 May 2019

Dear Mrs English

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2018**

3, 5 & 7 Fortess Road London NW5 1AA

Demolition of existing buildings and erection of a four storey block with retail units at ground floor and 3 x 3-bed residential units above including excavation of basement

Recommend Archaeological Condition(s)

Thank you for your consultation dated 07 May 2019.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.



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

The submitted Heritage Impact Assessment concludes that the site's main potential are for remains associated with the medieval and post-medieval development of Kentish Town. The proposed development includes a basement across the footprint of the site, however the site is relative small in size and the existing building are likely to have had some impact on archaeological survival. In light of this I concur with the recommendations set out within the assessment and that an archaeological watching brief should be carried out during development. If any initial geotechnical investigations are proposed, then these could be archaeologically monitored and would help to inform the need or scope for the watching brief during development.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains. However the significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. I therefore recommend the following condition on any consent:

- 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 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.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199. The archaeological work should include:



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Watching Brief

A watching brief involves the proactive engagement with the development groundworks to permit investigation and recording of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

You can find more information on archaeology and planning in Greater London on our website.

This response only relates to archaeology. You should also consult Historic England's Development Management on statutory matters.

Yours sincerely

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Laura O'Gorman

Archaeology Advisor

Greater London Archaeological Advisory Service
London and South East Region



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