



Historic England

Obote Hope
London Borough of Camden
Town Hall,
Camden Town Hall Extension,
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Camden,
London,
WC1H 8ND

Your Ref: 2018/5713/P
Our Ref: CLO29027
Contact: Sandy Kidd
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24 May 2019

Dear Mr Hope

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

St Pancras Coroners Court Camley Street London N1C 4PP

Partial removal of the front concrete boundary wall to St Pancras Gardens and constructing a two-pass ramp to provide disabled access into St Pancras Gardens off Camley Street.

Recommend Archaeological Condition(s)

Thank you for your consultation dated 20 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: St Pancras..

I have reviewed the information supplied with the application and our own records and consider that there is a risk of the groundworks encountering burials. This is because the 1870 map shows the site adjacent to St George's Bloomsbury and St. Giles burial ground and at least partly within a plot marked 'Grave Yd (Disused)' which also contains a 'Dead House' (i.e. mortuary). I note that this area was later built over and that recent trial pits do not report encountering burials but nonetheless there is a distinct possibility that deep groundworks will encounter human remains, either articulated skeletons or disturbed charnel. Even if an attempt was made to clear burials before building our experience is that such efforts were rarely completely successful. However, overall the proposed works would only impact on a very small part of a large post-medieval cemetery so would only cause minor localised harm.

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



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application should be refused as it would not comply with NPPF paragraph 199. The archaeological work should include:

Watching Brief

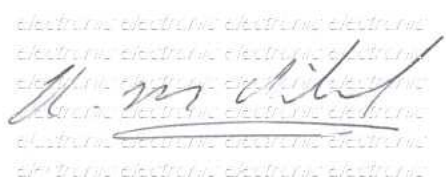
A watching brief involves the proactive engagement with the development groundworks to permit investigation and recording of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome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

Because of the previous negative trial pits a watching brief with contingency should provide adequate safeguard

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



Sandy Kidd

Archaeology Advisor

Greater London Archaeological Advisory Service
London and South East Region



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