

# 5.0

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## 5. Methodology

### Archaeological Assessment Methodology

- 5.1** This report has been produced in accordance with the Standard and Guidance for Historic Environment Desk-Based Assessment issued by the Chartered Institute for Archaeologists (CIfA, 2017). These guidelines provide a national standard for the completion of desk-based assessments.
- 5.2** The assessment principally involved consultation of readily available archaeological and historical information from documentary and cartographic sources. The major repositories of information comprised:
- Information held by the Greater London Environment Record on known archaeological sites, monuments and findspots within 250m of the Site;
  - Historic Maps from online sources;
  - The National Heritage List for England curated by Historic England; and
  - Records made during a site visit in August 2018.
- 5.3** This report provides a synthesis of relevant information for the site derived from a search area extending up to 250m from its boundary, hereafter known as the 'study area', to allow for additional contextual information regarding its archaeological interest or potential to be gathered.
- 5.4** The report concludes with (2) an assessment of the site's likely archaeological potential, made with regard to current best practice guidelines, and (2) an assessment of the likely effects of the proposed development upon designated and undesignated archaeological assets, whether direct or indirect.

### Assessment of Heritage Significance and Importance

- 5.5** Heritage assets are assessed in terms of their significance and importance, following the requirement in NPPF paragraph 189, and taking account of Historic England's guidance in *Managing Significance in Decision-Taking in the Historic Environment* (GPA2). Significance, in relation to heritage policy, is defined by the NPPF as

*"the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic."*

*Significance derives not only from a heritage asset's physical presence, but also from its setting."*

**5.6** As noted above, setting is defined in Annex 2 of the NPPF as:

*"the surroundings in which an asset is experienced. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral."*

**5.7** The importance of a heritage asset is the overall value assigned to it based on its heritage significance, reflecting its statutory designation or, in the case of undesignated assets, the professional judgement of the assessor (Table 1). Historic England guidance also refers to an asset's 'level of significance' (GPA2, paragraph 10), which in this usage has the same meaning as importance. Nationally and internationally designated assets are assigned to the highest two levels of importance. Grade II Listed Buildings and Grade II Registered Parks & Gardens are considered of medium importance, reflecting the lower level of policy protection provided by the NPPF (paragraph 194). Conservation Areas are not assigned to either level of importance by the NPPF but their status as local designations and their omission from the National Heritage List justifies their classification here as assets of medium importance. Other non-designated assets which are considered of local importance only are assigned to a low level of importance. Following the NPPF (Annex 2), a historic feature which lacks 'a degree of significance meriting consideration in planning decisions, because of its heritage interest' is not considered to be a heritage asset; it may also be said to have negligible heritage importance.

Table 1: Criteria for Assessing the Importance of Heritage Assets

Importance of the asset	Criteria
Very high	World Heritage Sites and other assets of equal international importance

High	Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Grade I and II* Listed Buildings, and undesignated heritage assets of equal importance
Medium	Conservation Areas, Grade II Registered Parks and Gardens, Grade II Listed Buildings, heritage assets on local lists and undesignated assets of equal importance
Low	Undesignated heritage assets of lesser importance

## Potential for unknown heritage assets

### 5.8

Archaeological features are often impossible to identify through desk-based assessment. The likelihood that significant undiscovered heritage assets may be present within the application site is referred to as archaeological potential. Overall levels of potential can be assigned to different landscape zones, following the criteria in Table 2, while recognising that the archaeological potential of any zone will relate to particular historical periods and types of evidence. The following factors are considered in assessing archaeological potential:

- The distribution and character of known archaeological remains in the vicinity, based principally on an appraisal of data in the [HER];
- The history of archaeological fieldwork and research in the surrounding area, which may give an indication of the reliability and completeness of existing records;
- Environmental factors such as geology, topography and soil quality, which would have influenced land-use in the past and can therefore be used to predict the distribution of archaeological remains;
- Land-use factors affecting the survival of archaeological remains, such as ploughing or commercial forestry planting; and
- Factors affecting the visibility of archaeological remains, which may relate to both environment and land-use, such as soils and geology (which may be more or less conducive to formation of cropmarks), arable cultivation (which has potential to show cropmarks and create surface artefact scatters), vegetation,

which can conceal upstanding features, and superficial deposits such as peat and alluvium which can mask archaeological features.

**5.9** In light of the above, the assessment of heritage significant heritage within Sections 2 and 3 of this report has been prepared in a robust manner, employing current best practice professional guidance and giving due regard to the methodology detailed above.

Table 2: Archaeological Potential

Potential	Definition
High	Undiscovered heritage assets of high or medium importance are likely to be present.
Medium	Undiscovered heritage assets of low importance are likely to be present; and it is possible, though unlikely, that assets of high or medium importance may also be present.
Low	The study area may contain undiscovered heritage assets, but these are unlikely to be numerous and are highly unlikely to include assets of high or medium importance.
Negligible	The study area is highly unlikely to contain undiscovered heritage assets of any level of importance.
Nil	There is no possibility of undiscovered heritage assets existing within the study area.



# 6.0

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## 6. Legislation and Planning Framework

### Introduction

- 6.1** This section sets out existing legislation and planning policy, governing the conservation and management of the historic environment, of relevance to this application.
- 6.2** In terms of “*effects on the historic environment*”, the following paragraphs summarise the principal legislative instruments and planning policy framework.

### National Planning Policy Framework (NPPF)

- 6.3** The NPPF sets out the government’s approach to the conservation and management of the historic environment, through the planning process, with the opening paragraph of Section 16 [54] emphasising the need for local authorities to set out a clear strategy for the conservation and enjoyment of the historic environment, where heritage assets are recognised as an irreplaceable resource, to be preserved in a manner appropriate to their significance.
- 6.4** Paragraph 189 concerns planning applications, stating that:
- “...local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation”.*
- 6.5** Designated assets are addressed in Paragraph 193, which states that:
- “...when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.*

*The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

## 6.6

With regard to the decision-making process, paragraphs 195 and 196 are of relevance. Paragraph 195 states that:

*"Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use."*

## 6.7

Paragraph 196 states that:

*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."*

## 6.8

The threshold between substantial and less than substantial harm has been clarified in the courts. Whilst the judgement cited relates specifically to the impact of development proposals on a listed building, Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government* [2013] EWHC 2847<sup>13</sup> remain of relevance here in the way they outline the assessment of 'harm' for heritage assets:

<sup>13</sup> Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government* [2013] EWHC 2847



*"What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away.*

**6.9** Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either *"vitiating altogether [i.e. destroyed] or very much reduced"*.

In other words, for the 'harm' to be 'substantial' – and therefore require consideration against the more stringent requirements of Paragraph 195 of the NPPF compared with Paragraph 196; the proposal would need to result in the asset's significance either being

*"vitiating altogether or very much reduced".<sup>14</sup> Quite evidently, this represents a very high threshold to be reached.*

**6.10** Paragraph 200 advises that:

*"...local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably."*

**6.11** With regard to non-designated heritage assets, Paragraph 197 states that:

*"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

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<sup>14</sup> Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government [2013] EWHC 2847*

## Local Policies

**6.12** There are no policies set out in the 2017 Camden Local Plan relating to archaeology however those policies set out in the London Plan 2016 are relevant to this assessment

### **The London Plan 2016**

#### Policy 7.8 Heritage Assets and Archaeology

- A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.
- C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.
- G. Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate

policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

# 7.0

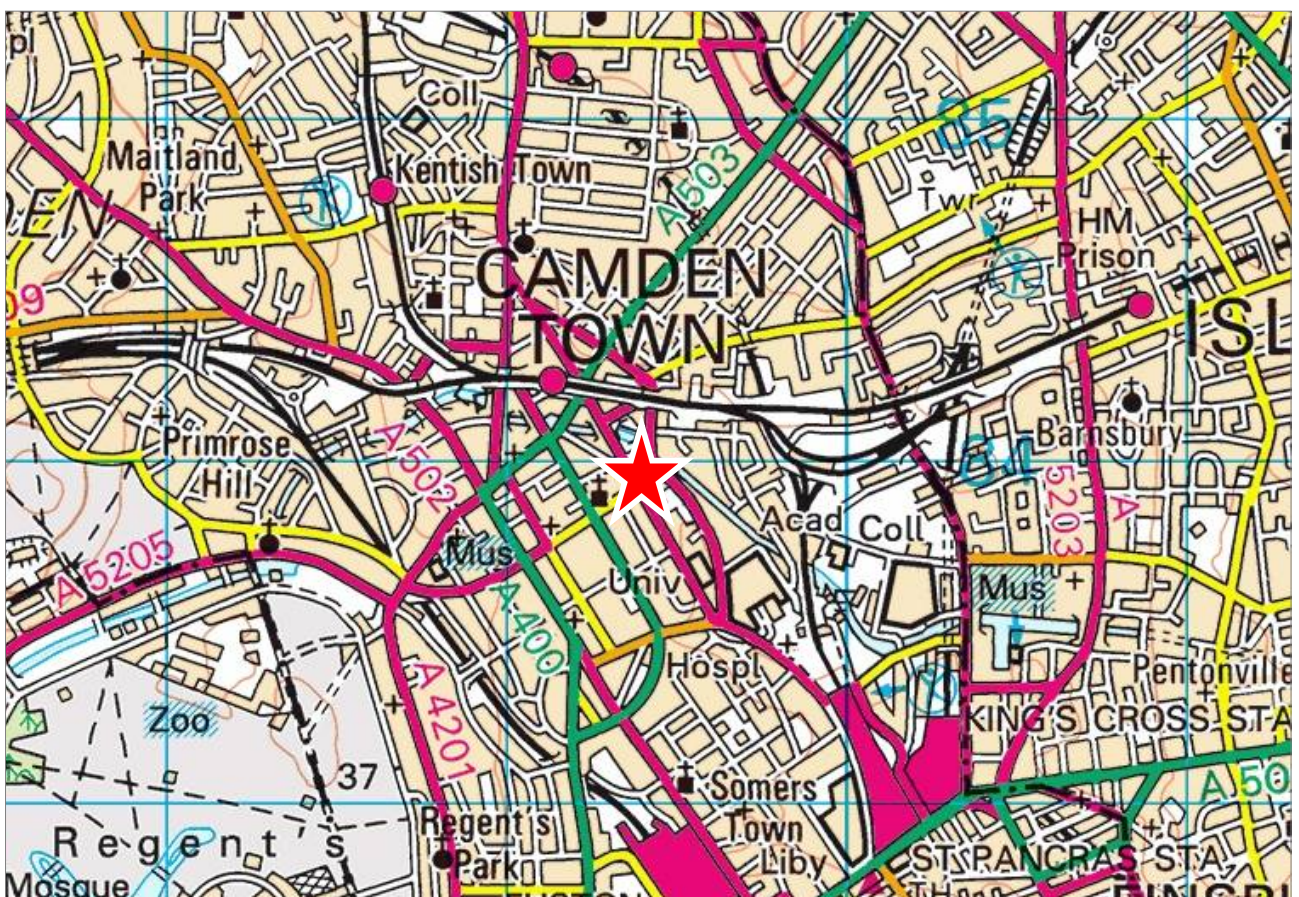
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## 7. Appendix 1 – Site Location





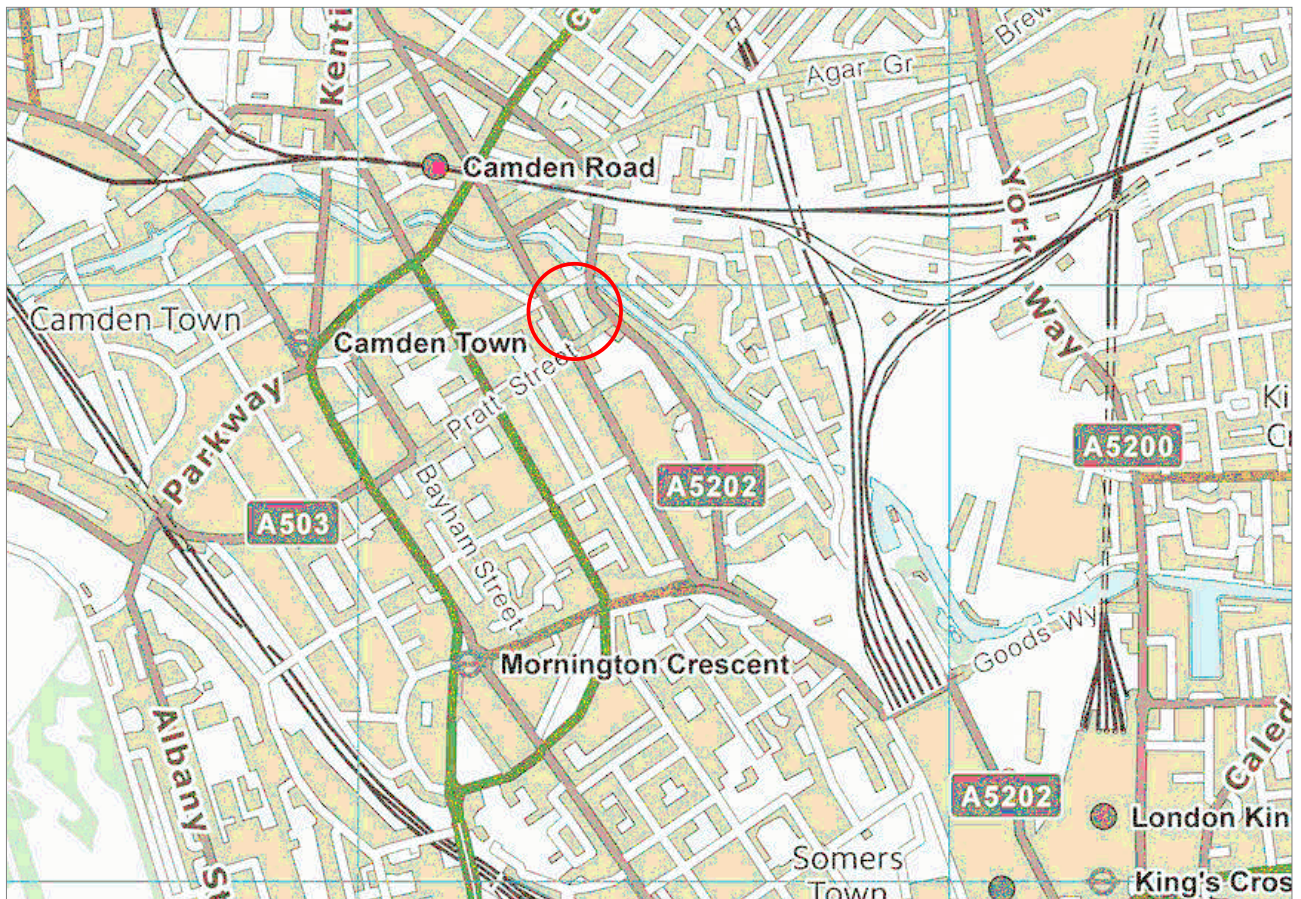
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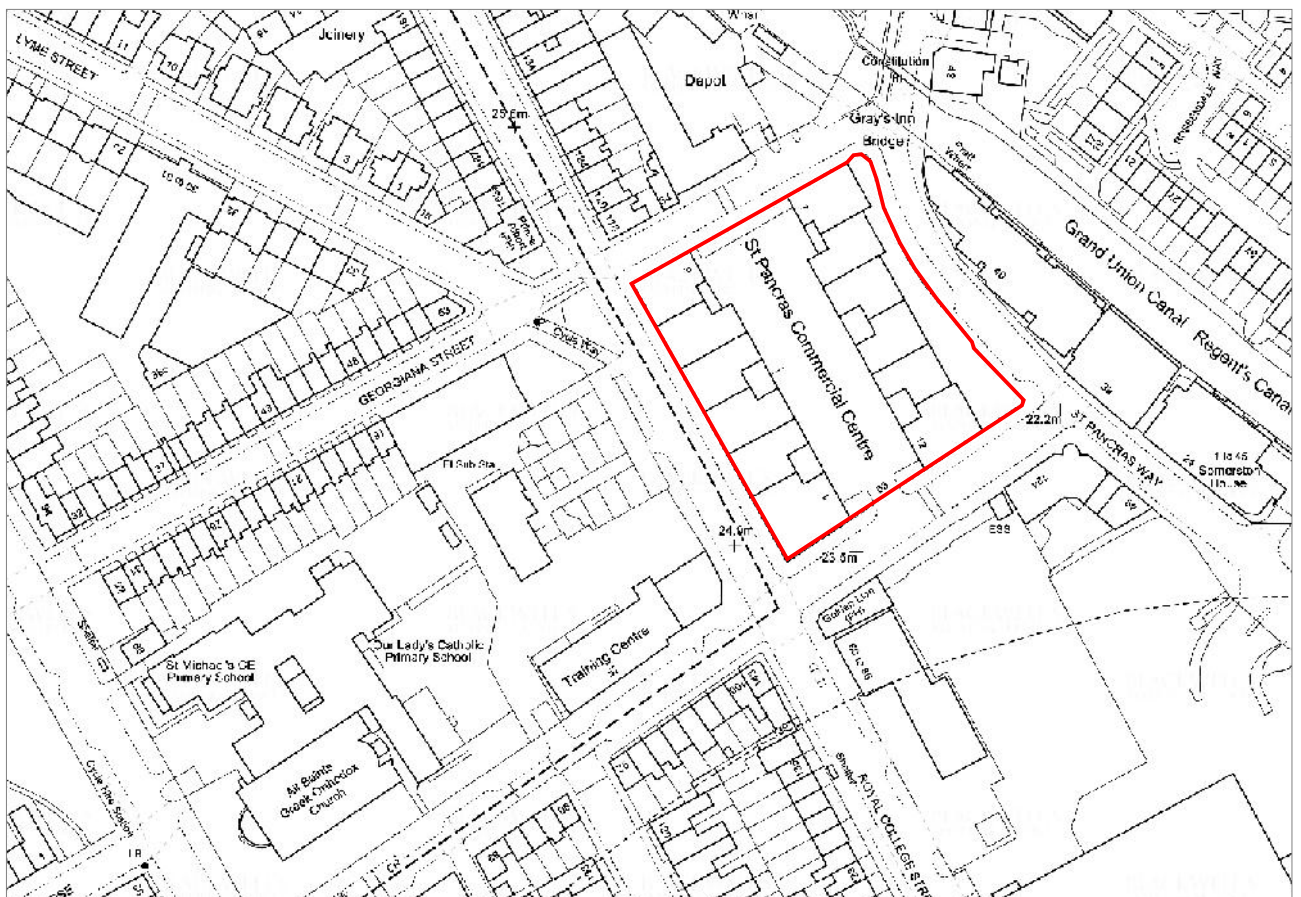
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**Figure 1.1:** Site Location.





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**Figure 1.2:** Detailed Site Location.

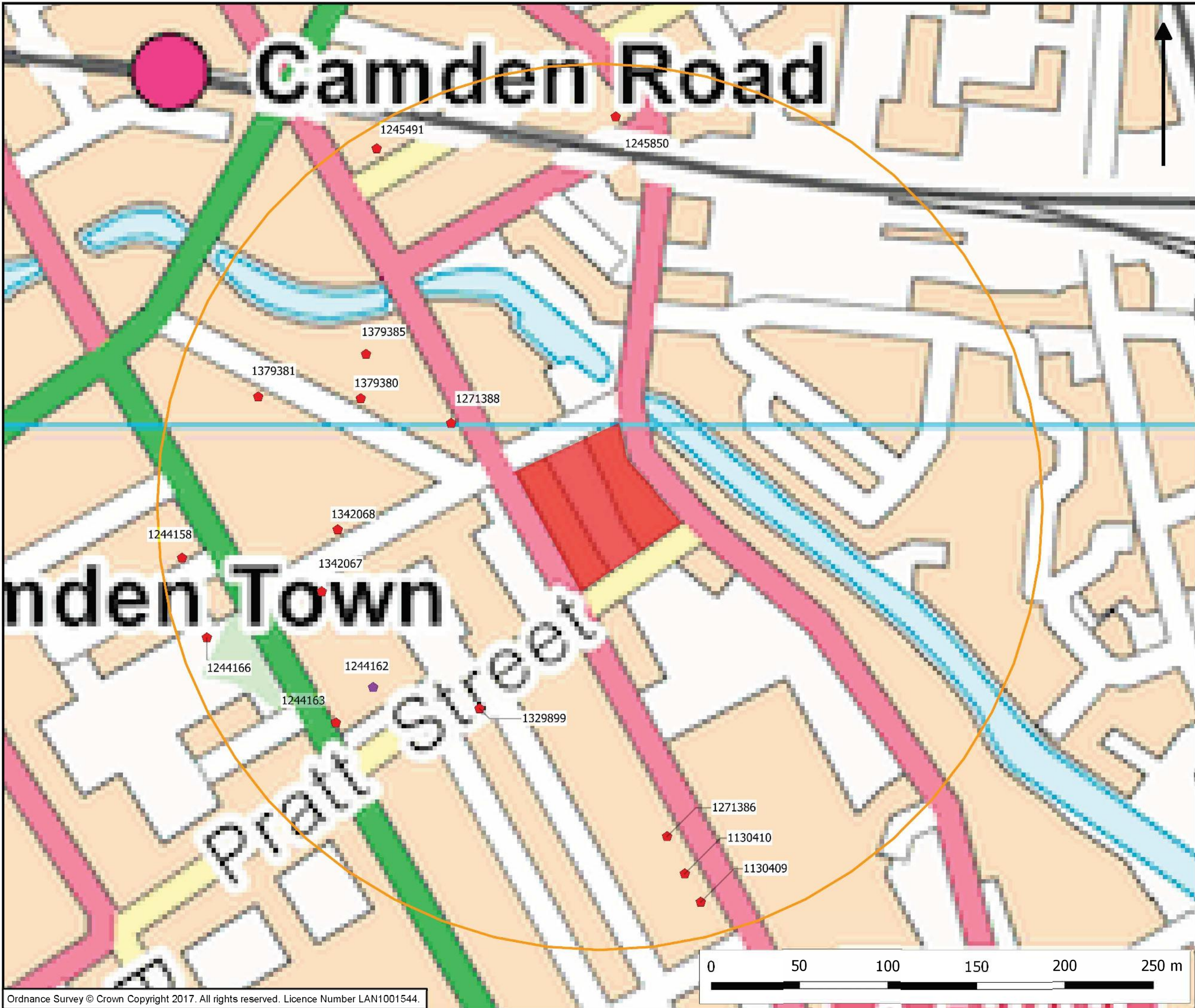


# 8.0

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## 8. Appendix 2 – Figures showing locations of Heritage Assets





Legend

- Application Site
- 250m Study Area

Designated Assets

Listed Buildings

- Grade I
- Grade II

Site Name:  
ST PANCRAS COMMERCIAL CENTRE

Scale @ A3:  
1:2,000

On Behalf of:  
CAMDEN PROPERTY HOLDINGS

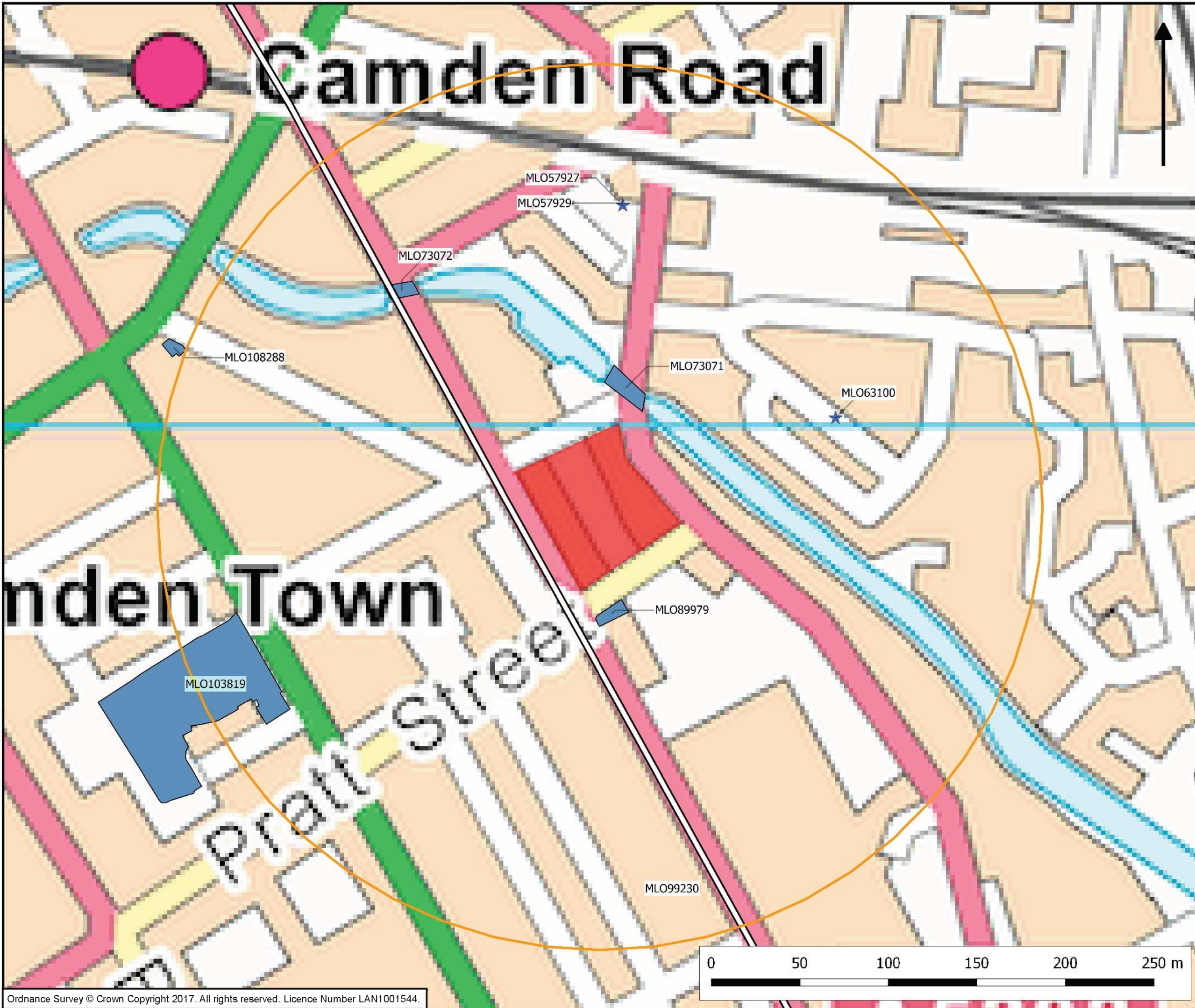
**Archaeology Collective**  
charlotte@archaeologycollective.co.uk  
www.archaeologycollective.co.uk

**Figure 2.1:**  
Designated Heritage Assets within the 250m Study Area

Date:  
August 2018

Revision:  
v.1





#### Legend

Application Site

250m Study Area

#### Non-designated Assets



Site Name:  
ST PANCRASCOMMERCIAL CENTRE

Scale @ A3:  
1:2,000

On Behalf of:  
CAMDEN PROPERTY HOLDINGS

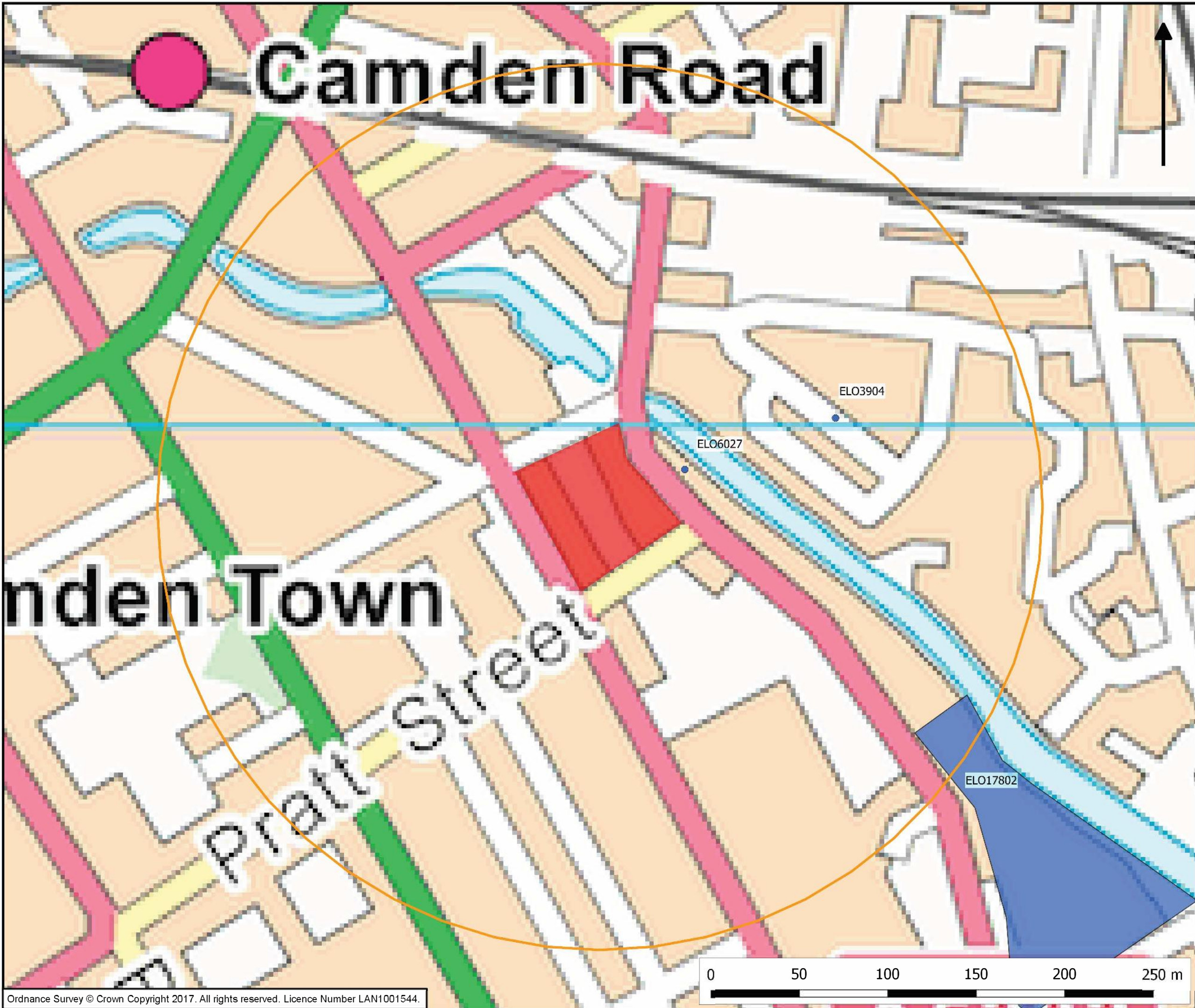
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**Figure 2.2:**  
Non-designated Heritage Assets within  
the 250m Study Area

Date:  
August 2018

Revision:  
v.1





#### Legend

Application Site

250m Study Area

#### Archaeological Investigations



Site Name:

ST PANCRA'S COMMERCIAL CENTRE

Scale @ A3:

1:2,000

On Behalf of:

CAMDEN PROPERTY HOLDINGS

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charlotte@archaeologycollective.co.uk  
www.archaeologycollective.co.uk

#### Figure 2.3:

Archaeological Investigations within  
the 250m Study Area

Date:

August 2018

Revision:

v.1