



Historic England

Mr Jonathan McClue
London Borough of Camden
Town Hall,
Camden Town Hall Extension,
Argyle Street,
Camden,
London,
WC1H 8ND

Your Ref: 2020/5774/P
Our Ref: CLO32709
Contact: Laura O’Gorman
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21 December 2020

Dear Mr McClue,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2019**

Murphy's Yard Kentish Town NW5

Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development comprising 17 development plots with circa 750-825 homes (including a proportion of affordable housing), circa 95,000sqm of commercial floorspace including up to approximately: 40,700sqm industry (Classes B2, B8 and E(g)(i)); 38,000sqm flexible office and research and development (Classes E(g)(i) and (ii)); 20,000sqm research and development (Class E(g)(ii)); 6,000sqm of retail/leisure (Classes E(a), (b), (d) and Sui Generis); 16,000sqm residential institution (Class C2) and 1,230sqm community uses (Class F1/F2).

Recommend Archaeological Condition(s)

Thank you for your consultation dated 11 December 2020.

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 Draft London Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and 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.



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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.

The site does not lie within an archaeological priority area, and the evidence indicates that the site has a relatively low potential for remains of regional or national significance. Any archaeology would most likely comprise remains of the 19th century railway and industrial development and any geoarchaeological deposits potentially associated with the Fleet River which is believed to have been located in the eastern part of the site. It is likely however that any remains and deposits which pre-date the 19th century will have been significantly compromised by the railway and industrial development. Any archaeological remains or deposits will most likely be of local significance.

Having reviewed the submitted archaeological desk based assessment (DBA), I am inclined to agree with the scoping report which states that Archaeology should be scoped out of the EIA.

I also agree with the recommendations set out within the DBA: that given the scale of the site and the lack of past investigations having been carried out within the site's boundary, a programme of archaeological investigation should be carried out in accordance with a planning condition. This could initially comprise the monitoring of any geotechnical investigation in order to identify areas of good archaeological survival. Alternatively the first phase of archaeological investigation would comprise evaluation trenches. The aim of the initial phase of investigation should be to determine the level of archaeological survival and the nature and significance of those remains. This would help to identify the need for any targeted archaeological mitigation.

I therefore recommend 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. Where appropriate, details of a programme for delivering related positive public benefits.
 - C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the



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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.

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 precommencement 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.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

Archaeological monitoring of geotechnical pits and boreholes can provide a costeffective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk-based assessment or field evaluation.

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.

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 Advice Team on statutory matters.

Yours sincerely

Laura O'Gorman

**Assistant Archaeology Advisor
Greater London Archaeological Advisory Service
Planning Group: London**



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