

Response on the Archaeological Assessment for application 2020/5593/P

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The Assessment ratings of 'low' for pre-history and Roman potential are contestable.

1. The Site was not marshland: it was formerly pasture beside the River Fleet. Barton's current (2016) book on London's 'lost' rivers does not mention a 'marshy landscape'. Although the land at the bridge / ford (Battle Bridge) was/is relatively flat, allowing the crossing but also risking floods, the geographical contours and Roque's mid eighteenth-century map show the Site above the river, sloping east towards it.



(Layers of London, London Metropolitan Archives / Archaeological Assessment 2020)

2. The Assessment recognises that there have been Roman findings in nearby Holborn, and yet ignores the equally extensive late Palaeolithic findings – at least a dozen sites for stone axes and fragments in GLHER. The first axe ever recorded, now treasured by the British Museum, was found in 1670s during works on the Fleet.

"The Gray's Inn Lane handaxe is important in the history of British archaeology as it the first known record with a published illustration of such an implement. It was also important in the discovery of the length of human antiquity."
https://www.britishmuseum.org/collection/object/H_SLAntiq-246

Fiona Haughey's *'People and Water'* (PhD UCL, 2009) show how significant Thames rivers were for pre-Roman human activities, economic and symbolic. There is a gap in the record for the Fleet.

3. To say that the Site was 'not a location favourable for settlement' is at odds with the local histories of Saxon settlements at both St Pancras and Battle Bridge. St Pancras and Bagnigge Wells were notable medicinal spas – fresh drinking water from springs.

4. The Assessment does not indicate how many local ('within the circle') investigations in the past three decades on non-Railway disturbed land have looked actively for Neolithic and Roman findings: but implies that none have.

Absence of evidence is not evidence of absence. This is a site of national significance. An archaeological investigation should assess the Pleistocene record from bore-holes, dig trenches for the Palaeolithic and investigate Roman and Saxon settlement.