



Historic England

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

Your Ref: 2021/3225/P
Our Ref: CLO34834
Contact: Helen Hawkins
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17 January 2022

Dear Mr McClue

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) NATIONAL PLANNING POLICY FRAMEWORK 2021

Land to the south of Gordon House Road bounded by railway lines to the east west and south and accessed from Gordon House Road

Outline planning permission with all matters reserved for the demolition of existing buildings and structures and redevelopment to be carried out in phases (with each phase being an independent act of development) comprising 18 development plots (for the purposes of consultation: including buildings with a maximum height of 113.45m AOD) for the following mix of uses: [750-825] residential units (Use Class C3), [up to 8,000sqm GEA] residential institution floorspace (Use Class C2), [a minimum of 40,461sqm GEA] industrial floorspace within Use Classes E(g)(iii), B2 and B8 and [up to 8,150sqm] general industrial and/or storage floorspace [Use Class B2 and/or B8], commercial floorspace (Class E) including [up to 36,043sqm GEA] light industrial floorspace (Class E(g)(iii)), [up to 34,500sqm GEA] office floorspace, [up to 36,000sqm GEA] research and development floorspace (Class E(g)(ii)), and [up to 16,000sqm] healthcare floorspace (Class E(e)), [1,300-3,650sqm GEA] flexible commercial and sui generis floorspace (Use Class E and/or Sui Generis Use), [300-1,300sqm GEA] community floorspace (F1 and/or F2), [up

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to 1,500sqm] flexible mixed-use space (Class Sui Generis), and cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space, landscape and public realm improvements including new pedestrian and cycle routes, and all associated works [for the purposes of consultation].

Recommend Archaeological Conditions

Thank you for your consultation received on 04 January 2022.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

The planning application lies in an area of archaeological interest.

If you grant planning consent, paragraph 205 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 provided in the DBA (RPS 2021) 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.

The locally listed former locomotive sheds are discussed in detail in the Built Heritage Statement (RPS 2021). The sheds are of interest as they represent the remains of the Midlands railway depot dating from the later 19th century. Turntables and radial pits for maintenance are also noted to be present in the Built Heritage Statement.

The main significance of the site therefore comprises three main elements; the Fleet river deposits, the below ground remains of railway features of interest and



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the upstanding locally listed railway buildings. Impacts on the railway features are likely to be high as they will be located directly below ground level. The locally listed buildings are to be retained but will be impacted by alterations required by their reuse.

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 and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

I therefore recommend attaching a condition as follows:

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 condition shall not be discharged until these

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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 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 205.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

Archaeological monitoring of geotechnical pits and boreholes can provide a cost-effective 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.

If geotechnical investigations are to be carried out in the former Fleet river area, these could be used to also investigate the former river deposits.

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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.

The archaeological evaluation should consider the remains of the 19th century railway infrastructure such as the turntables and maintenance pits as well as the deposits associated with the Fleet river.

Condition Building Recording

I also recommend that the following condition is applied:

Reason: Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF.

Condition: No demolition shall take place until a written scheme of historic building investigation (WSI) has been submitted to and approved by the local planning authority in writing. For buildings that are 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 historic building 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 professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

Historic building recording to Historic England Level 3 should be carried out for the locomotive sheds on the site. Documentary and archive work should be carried out. Existing drawn plans can be annotated as long as they are checked on site for accuracy.

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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

H Hawkins

Helen Hawkins

Archaeology Adviser

Greater London Archaeological Advisory Service

London and South East Region



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