**RPS Comments on archaeology at 628-634 Commercial Rd Appeal Ref PP/E5900/W/20/3250665**

These comments are provided by RPS Group who provided an Archaeological Desk-Based Assessment (DBA) for the development site. The qualifications and professional accreditations of the authors are provided in that document. It is on this document and following consultation with GLAAS who advise the LPA on archaeological matters on which these comments are based.

**RPS Summary**

No evidence has currently been found to suggest a burial ground was present on the site. No such burial ground is shown on historic mapping or recorded in the London Metropolitan Archives. Further information held at the Tower Hamlet Archives is yet to be researched owing to Covid restrictions.

There is then only a perceived potential for remains to be present on site and a hypothetical significance should these remains be present.

If present remains could be considered of up to Regional significance if well preserved. Two phases of residential development at the site are considered likely to have impacted any remains which may have been present.

Any remains present are therefore considered unlikely to be in a well-preserved state and therefore unlikely to be considered of Regional significance.

On this basis we have previously recommended that the archaeological interest of the site would be afforded proportionate protection by the staged GLAAS standard worded planning condition secured to any planning consent.

**Significance**

The GLAAS statement on archaeology draws from the DBA that the site was occupied during the nineteenth century by a Congregationalist Chapel (Coverdale Chapel) and that it is not clear from the research so far whether or not the chapel had an associated burial ground.

The statement goes on to identify that if a complete and well-preserved cemetery was present that it could be assessed to be of Regional significance as at the comparable example at the Philpot Street Congregationalist burial ground near the Royal London Hospital at Whitechapel.

Non-designated archaeological remains of potentially regional significance can be considered worthy of preservation in-situ and if present a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Current research however has identified there are no maps showing a burial ground at the chapel and there are no burial records held by the London Metropolitan Archives for the chapel.

**Impact**

The GLAAS statement concludes a new basement that would likely remove all archaeological remains at the site, including any burials.

This is likely true however the statement fails to acknowledge any impacts likely to have been caused by the existing development which occupies the site. Preparation of the site, foundations, drainage and other services for a three-storey residential building would also be expected to have already had a severe impact on any below ground archaeological assets if present.

**Position**

GLAAS’ have asked for further research to determine whether or not the chapel had an

associated cemetery. This comprises dedicated archive research from the Tower Hamlets Local Archive (THA) to identify any records of burial use.

GLAAS have expressed they would be pleased to examine and comment on an updated archaeological desk-based assessment that includes the appropriate archive research on burials. An alternative approach, or if the archive work is inconclusive, would be to agree light touch test pitting at the site to directly look

for burials.

It has been confirmed that the THA does hold congregation records and minutes for the Chapel which we would anticipate would mention burials if any were interred at the chapel itself. Owing to lockdowns in respect of Covid, Christmas Close down and subsequent Covid lockdowns the THA has not been open for the latter part of last year and early this to access any records. A thorough search of the records will take place as soon as this is possible.

In regard to light touch test pitting we do not consider this a suitable approach to understanding the presence/absence of human remains at the site. The site is a residential premise currently in use. Almost all the redline boundary is covered by the existing residential building except a small area along the frontage of the property onto Commercial Road. This area is narrow and could at best only facilitate two small pits. This area is likely to be full of services linking the property to the street.

Archaeologically two small test pits would not be sufficient in proving the presence/absence of human remains at the site. Test pits in such low frequency are probably not the appropriate methodology for encountering burials, especially in an area likely to be as disturbed as this. It is likely the pits would provide ambiguous results or an absence of evidence. A negative from two test pits is unlikely to change the position of GLAAS as 95% of the site will remain untested. This will also not provide sufficient information to inform the current appeal process, as the likelihood is this work will not prove/deny the archaeological potential in any way.

**RPS View**

The appropriate way to investigate this site is through the records as the scope of current physical interventions would not provide sufficient information to inform the process.

Although it cannot be ruled out the likelihood of a well-preserved Congregational Cemetery of Regional significance at the site on balance is considered as low. Not all such Chapels had an associated burial ground. Based on current evidence any attached burial ground would have been active from when the Chapel was built (1841), the Burial Act 1852 when it would be thought this would stop, and 1875 when residential development is shown abutting the chapel on all sides. That the Chapel, still present in 1875, would hand over any associated burial ground to residential development at this time is also questionable.

If a burial ground was ever present cannot be ascertained for certain until the records are accessible. What condition a burial ground is likely to be in, if ever present, is also a valid question relating to potential significance. Adjacent residential development is first shown in 1875 abutting the site. By 1969 the site is shown as developed again for more substantial and concentrated residential living. Any remains present are therefore considered unlikely to be in a well-preserved state and therefore unlikely to be considered of Regional significance.

On this basis we have previously recommended that the archaeological interest of the site would be afforded proportionate protection by the staged GLAAS standard worded planning condition secured to any planning consent.

RPS January 2021