

Council for British Archaeology

A National Amenity Society

Kate Henry
By email: planning@camden.gov.uk

22nd February 2017
Your ref: 2017/0414/P

Dear Ms Henry,

Re: Middlesex Hospital Annex, 44 Cleveland Street, London W1T 4JT

Thank you for consulting the Council for British Archaeology (CBA) on the above case. We have considered the application and I now write to you with our comments.

CBA comment summary

The buildings on the site of the former Middlesex Hospital Annex span the development of health and welfare provisions from the Old Poor Law, through the New Poor Law, to the establishment and development of the NHS. There has been longstanding interest in redeveloping the site and the CBA recognises that redevelopment is a complex undertaking. Whilst redevelopment of the site is acceptable in principle, the CBA **objects** to the demolition of the pavilion hospital wings to the rear of the Grade II Listed Building. Further work should be undertaken to make these proposals appropriate for the sensitivities and significance of the former Middlesex Hospital Annex as a heritage asset. We make the following points:

- The application causes harm to the Grade II Listed Building through loss of the historic hospital wings.
- The applicant has not provided “*clear and convincing justification*” for the loss of the hospital wings and is therefore contra to the NPPF paragraph 132.
- The CBA has concerns that the current application is not taking the right approach to archaeological mitigation strategies, especially given the high potential for encountering human remains.
- The CBA propose a programme of historic building recording of the hospital wings and South House pre-determination of this application.

Proposal comments

This ambitious proposal would see the redevelopment of the former Middlesex Hospital Annex. The proposed development would include: the retention and renovation of the designated later 18th century workhouse building and North House; part demolition and part redevelopment of the South House; and, the demolition of the two later-19th century pavilion hospital wings. The CBA supports the principle of securing a sustainable long-term future for the Grade II Listed Building but **objects** the demolition of the pavilion hospital wings, which reflect the development and use of the site as an infirmary for the Central London Sick Asylum District.

In accordance with the National Planning Policy Framework (NPPF, 2012) paragraph 131, “*local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets*”. “*Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting*” (NPPF paragraph 132).

Council for British Archaeology
Beatrice de Cardif House, 66 Bootham
York YO30 7BZ
Tel: 01904 671417

Archaeology for all
Email: info@archaeologyUK.org
www.archaeologyUK.org

Registered charity in England and Wales (287815)
and a charity registered in Scotland (SC041971).
Company Limited by Guarantee (1760254)
Patron: HRH The Prince of Wales

Council for British Archaeology

Although these buildings are exempt from listing and are not early examples of an infirmary constructed to a pavilion plan, the CBA argues that the permanent loss of the hospital wings would cause harm to the significance of the Grade II Listed Building. The use and development of the site is closely connected to the changing nature of health and welfare institutions in the 18th and 19th centuries. In this instance, the development of the rear of the workhouse, construction of the infirmary blocks and redevelopment of these wings in the later 19th century provides tangible evidence for the tensions between the ideologies behind, and implementation of, the New Poor Law in England. As noted in the Heritage Statement (2017, paragraph 3.1.6) submitted by the applicant, these buildings reflect an important phase in the development of this site. The hospital wings are associated with wider longstanding concerns regarding the treatment of the poor and the actions of lead 19th century campaigning figures, such as Dr Joseph Rogers and Lousia Twining, who sought to reform daily living conditions for 'infirm' and 'lunatic' classes of pauper inmates. Their loss would remove an important phase in the narrative of this site and would reduce the legibility of the complex as being a site of continuous health and welfare provision between 1775 and 2006. Your authority should be confident that these proposals sustain the significance of the former workhouse complex. The CBA would suggest that they do not.

The NPPF paragraph 132 states that "*As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification*". The CBA would suggest that clear and convincing justification has not been provided. The applicant's argument that the pavilion hospital wings are not suitable for residential development is predicated on the density of housing the applicant wishes to pursue. Pavilion plan hospital wings in urban settings have been successfully redeveloped into residential units in a number of examples throughout England, and a reduced density of housing could lead to a similarly successful scheme in this instance. As the proposals would result in harm to heritage assets, in accordance with the NPPF paragraph 134, the council should be confident that the proposals represent "*optimum viable use*". The CBA strongly urges the applicant to revise their design to include a more heritage-led approach which would allow for the retention of the existing hospital wings.

The documented presence of a pauper burial ground attached to the Workhouse and in use between 1775 and 1853, has been noted in the Heritage Statement (2017, paragraph 2.3). However, the impact of the proposals on the burial ground, and level of archaeological potential have not been addressed by the applicant in the application documents. Whilst the CBA acknowledges that previous development has disturbed archaeological remains, the applicant has not comprehensively demonstrated that there are no surviving below-ground archaeological features within the application site boundary. In addition, the current application does not provide evidence of any archaeological investigation having taken place within the application site. Given written accounts of pauper graves being disturbed during the construction of the pavilion wings in the 19th century, the potential for the proposed works to encounter human burials remains high. The CBA strongly recommends a programme of targeted archaeological investigation to identify the archaeological potential of the site. This is recommended pre-determination of this application in order to inform the applicant and reduce risk.

The CBA strongly recommends a programme of historic building recording of the hospital wings and South House pre-determination of this application. In this instance the CBA recommends that a recording takes place to at least Historic England Level 3 (*Understanding Historic Buildings; A guide to good recording practice, 2016*) with the information deposited as a publically accessible resource, as according to paragraph 141 of the NPPF. This would ensure the appropriate analysis of the whole of the site to a consistent standard and would provide a comprehensive piece of work which reflects the significance of these structures as heritage assets.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Council for British Archaeology
Beatrice de Cardi House, 66 Bootham
York YO30 7BZ
Tel: 01904 671417

Archaeology for all
Email: info@archaeologyUK.org
www.archaeologyUK.org

Registered charity in England and Wales (287815)
and a charity registered in Scotland (SC041971),
Company Limited by Guarantee (1760254)
Patron: HRH The Prince of Wales

Council for British Archaeology

Yours sincerely,



Dr Suzanne Lilley
Listed Buildings Caseworker for England

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in ODPM Circular 09/2005 and in Welsh Office Circulars 61/96 & 1/98.

Council for British Archaeology
Beatrice de Cardi House, 66 Bootham
York YO30 7BZ
Tel: 01904 671417

Archaeology for all
Email: info@archaeologyUK.org
www.archaeologyUK.org

Registered charity in England and Wales (287815)
and a charity registered in Scotland (SC041971).
Company Limited by Guarantee (1760254)
Patron: HRH The Prince of Wales