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Mr David Fowler

London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

Your Ref: 2023/2653/L

Our Ref: 215343

Contact:

Louise Davies

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2023-07-17

Dear Mr Fowler,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)**

**NATIONAL PLANNING POLICY FRAMEWORK 2021**

**Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London WC1A 1JR**

*Alterations, including part-demolition, to 10-12 Museum Street and 35 and 37 New Oxford Street, to provide flats and townhouses. Demolition of closet wing to 10 Museum Street, infill of door openings. Demolition of modern rear extension to 11-12 Museum Street from ground to third floors, rebuilding of rear wall. Removal of non-original staircase and internal walls to 11-12 Museum Street along with new layouts and thermal upgrades including internal wall insulation, to facilitate new flats. New bridge links to 12 Museum Street from 16a-18 West Central Street. Removal of non-original partition walls to 35 and 37 New Oxford Street, reinstatement of historic room layouts, thermal upgrades. Across listed buildings: New kitchens, bathrooms and sanitaryware; Introduction of slimline double-glazed retrofit vacuum glazing to existing window joinery, limited replacement frames; New internal and external doors; Facade refurbishment works; Conservation and restoration of historic joinery, plasterwork, fireplaces and other features of heritage importance. Courtyard garden linking buildings at first floor level above ground floor shared services, with new and amended openings to listed buildings to provide access. New and restored retail frontages to all buildings.*

**Recommend Archaeology Condition**

Thank you for your consultation received on 2023-06-27.

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.

Assessment of Significance and Impact

The proposed development site lies in an Archaeological Priority Area.

No historic building recording work is recommended, however in line with application 2023/2510/P I recommend that any below ground works on this site in areas of low-moderate archaeological potential be undertaken alongside an archaeological watching brief.

Planning Policies

NPPF Section 16 and the London Plan (2021 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 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

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.

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.

Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

I therefore recommend attaching a condition as follows:

Condition No demolition or development shall take place until a 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, which shall include the statement of significance and research objectives, and

1. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
2. Where appropriate, details of a programme for delivering related positive public benefits
3. 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 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:

**Watching Brief**  
  
An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England’s Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Louise Davies

Archaeology Adviser

Greater London Archaeological Advisory Service

London and South East Region