



Historic England

Sam Fitzpatrick
Planning
LB Camden

Your Ref: 2023/5103/P
Our Ref: 218860

Contact: Sandy Kidd
[REDACTED]
[REDACTED]

19 February 2024

Dear Mr Fitzpatrick,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023**

Chancery Station House 31-33 High Holborn London Camden WC1V 6AX

Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (F1), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Fumival Street; redevelopment of 40-41 Fumival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works.

Updated Archaeological Advice: Recommend Archaeological and Historic Building Recording Conditions

Thank you for sending the archaeological desk-based assessment. This response relates to archaeology in the Camden only and a separate response has been provided by GLAAS for the City of London.

The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

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 paragraphs 199 - 202 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 203). Conservation can mean design changes to preserve remains where they are.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.

Assessment of Significance and Impact

Kingsway Tunnels

I recommend that The Kingsway Tunnels themselves should be considered a non-designated heritage asset because of their historical interest documented in the Heritage Statement. I support their imaginative beneficial re-use including heritage interpretation.

For the works required within the tunnels it is recommended that historic building recording is carried out in advance of redevelopment. Historic building recording is an investigation to establish the character, history, dating, form and development of a historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes place. The outcome will be an archive and a report which may be published. The historic building recording should utilise the digital scans that have already been carried out for the site.

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. I therefore recommend the following condition:

Historic Building Recording

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 and structures 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



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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.

Buried Archaeology

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [78218] London Suburbs. Holborn originated as a Roman road with a cemetery and other urban fringe uses alongside it. In the medieval period Chancery Station House lay opposite the Bishop of Lincoln's Inn and the original headquarters of the Knights Templar in England. By the 16th century the north side of Holborn was developed with tenements and public houses. Construction of the existing shafts will have removed archaeological remains associated with pre-20th century occupation at least within their 'footprints' but the extent of new groundworks required to deliver the proposed scheme at Fulwood Place seem rather unclear at the present time. I therefore recommend a precautionary condition for archaeological investigation which need not be engaged if in the final design groundworks are negligible.

Archaeological Investigation condition

No demolition or groundworks shall take place within 31-33 High Holborn until an archaeological impact assessment has been submitted and, if necessary, a written scheme of investigation (WSI) has been approved by the local planning authority in writing. For land that is included within the WSI, no demolition or groundworks 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 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 elements have been fulfilled in accordance with the programme set out in the WSI

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



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

Yours sincerely

Sandy Kidd

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



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