



Historic England

Alex Kresovic  
London Borough of Camden

Your Ref: 2024/0993/P  
Our Ref: 220450

Contact: Greer Dewdney  
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16 April 2024

Dear Alex,

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

**135-149 Shaftesbury Avenue London WC2H 8AH**

*Part demolition, restoration and refurbishment of the existing Grade II listed building, roof extension, and excavation of basement space, to provide a theatre at lower levels, with ancillary restaurant / bar space (Sui Generis) at ground floor level; and hotel (Class C1) at upper levels; provision of ancillary cycle parking, servicing and rooftop plant, and other associated works.*

**Recommend Archaeological Historic Building Recording Condition**

Thank you for your consultation received on 28 March 2024.

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**

It is clear from the submitted Archaeological Desk Based Assessment (RPS, Jan 24) that the existing double basement will have removed any archaeological remains from within the site footprint. No further archaeological works are required. The proposals will however impact



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the former Saville Theatre which was constructed in the 1930s and is grade II listed. The Heritage and Townscape Assessment (Montagu Evans, Jan 24) identifies that the significance of the building primarily lies in the buildings facades and historic association with Brian Epstein, The Beatles and Jimi Hendrix. The significance of the internal structure appears to have been somewhat diminished as a result of various phases of alterations. The assessment does however identify isolated areas of survival of the historic fabric. Further proposals for alteration are being proposed and in light of the significance of the building, and if the borough is minded to grant consent, then a programme of Level 2 Historic Building Recording should be carried out both prior to and during the works in order to record any currently hidden surviving elements of the historic structure.

### 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 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. Some historic buildings are of archaeological interest and this interest can be harmed by the loss of historic fabric.

If you grant planning consent, paragraph 211 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

I advise that the development could cause harm to the archaeological interest of the building(s). I therefore recommend the following condition on any consent:

- 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



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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.

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 211.

The archaeological work should include:

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

**Greer Dewdney**

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



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