

Delegated Report		Analysis sheet		Expiry Date:		02/01/2023	
		N/A / attached		Consultation Expiry Date:		20/04/2023	
Officer				Application Number(s)			
Elaine Quigley				2022/4847/P			
Application Address				Drawing Numbers			
150 Holborn London EC1N 2NS				See draft decision notice			
PO 3/4		Area Team Signature		C&UD		Authorised Officer Signature	
Proposal(s)							
Details of post-excavation assessment/analysis as part of the Written Scheme of Investigation to discharge Condition 37b of planning permission 2016/2094/P dated 25/06/18 for demolition of existing buildings and redevelopment for mixed use development up to nine storeys in height.							
Recommendation(s):		Refuse approval of details					
Application Type:		Approval of Details					
Conditions or Reasons for Refusal:		Refer to Draft Decision Notice					
Informatives:							
Consultations							
Adjoining Occupiers:		No. notified	00	No. of responses	00	No. of objections	00
				No. electronic	00		
Summary of consultation responses:		No requirement to consult. No consultation responses received.					
CAAC/Local groups* comments: *Please Specify		No requirement to consult. No consultation responses received.					

Site Description

The site is located on the west side of Gray's Inn Road on the junction with Holborn to the south and Brooke Street to the east. It comprises a mixed use development with a 9 storey building comprising commercial uses fronting Holborn and a 5 storey building comprising 13 residential flats that fronts Brooke Street. The development appears to be almost complete.

The building is not listed and does not fall within the conservation area.

Relevant History

Planning permission was granted on 25/06/2018 for demolition of existing buildings and redevelopment for mixed use development up to nine storeys in height comprising 12,862 sqm GIA office floorspace (Use Class B1), 1,480 sqm GIA retail floorspace (Use Class A1-A3), 13 residential units (Use Class C3), improvements to the public realm and all other necessary enabling works.

The majority of the conditions associated with the development have been discharged. The relevant conditions are listed below:

Approval of details application was **granted** on 15/11/2018 (ref 2018/3817/P) for details of cycle storage (condition 17), SUDS (condition 32a), written scheme of investigation (partial discharge condition 37) and bat survey (condition 42) of planning permission 2016/2094/P granted on 25th June 2018 for redevelopment for mixed use development of commercial, residential and retail floorspace. This part of the condition required a watching brief to be submitted setting out the programme and methodology of site evaluation.

An informative was attached to the decision reminding the application that condition 37b (post investigation WSI) was outstanding and required details to be submitted.

Relevant policies

Planning Policies

Camden Local Plan 2017
D2 Heritage

Assessment

BACKGROUND

Planning permission was granted on 25/06/2018 for demolition of existing buildings and redevelopment for mixed use development up to nine storeys in height comprising 12,862 sqm GIA office floorspace (Use Class B1), 1,480 sqm GIA retail floorspace (Use Class A1-A3), 13 residential units (Use Class C3), improvements to the public realm and all other necessary enabling works. As part of the planning permission a number of pre-commencement and compliance conditions were secured. Condition 37 required the following:

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:

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. 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

Reason: Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF and in order to ensure the identification of and minimise damage to important archaeological remains which may exist on this site, in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

A Written Scheme of Investigation (WSI) was submitted as part of approval of details application ref 2018/3817/P to partially discharge condition 37 that was granted on 15/11/2018. This set out the programme and methodology of site evaluation as required by condition 37a. The Watching Brief was prepared in accordance with all relevant guidelines, including those set out by the Chartered Institute for Archaeologists (CIfA 2014) and Greater London Archaeological Advisory Service (GLAAS 2015). GLAAS confirmed by way of a formal letter that having considered the submitted details, the WSI accorded with relevant standards and guidance and was in compliance with the planning condition. It was advised that the start date was required to be communicated to GLAAS, who would then conduct monitoring visits. It was confirmed that the archaeological condition would not be fully satisfied until all works were completed, including any post-excavation assessment/analysis leading to publication. Therefore this condition was partially discharged and condition 37b was still outstanding.

PROPOSAL

Approval of details application was submitted for details of post-excavation assessment/analysis as part of the Written Scheme of Investigation to discharge Condition 37b of planning permission 2016/2094/P dated 25/06/18 for demolition of existing buildings and redevelopment for mixed use development up to nine storeys in height.

ASSESSMENT

The wording of condition 37b is as follows:

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:

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

The applicant submitted an archaeological watching brief prepared by MOLA dated 2018. This confirmed that 2 test pits and 3 ground beam test pits were excavated in the north western part of the

site. The test pits revealed that archaeological remains were observed in the higher basement level where 2 – 3 pits of Roman date were recorded. It was confirmed that no archaeological features were exposed in the lower level basement.

Consultation response

GLAAS were consulted about the application. They confirmed that they had no correspondence about the site since August 2018 when the 2018 approval of details was partially discharged.

GLAAS advised that the approved WSI states the requirement for archaeological monitoring of *“removal of existing pile caps, proposed basement extension and deepening, excavations associated with the insertion of 5 lift pits and new pile caps and any other ground work with the potential to impact on archaeological remains.”*

The only activities that appeared to have been monitored were the excavation of 5 test pits; 2 of the pits showed potential for Roman archaeological remains to survive in the part of the site where the basement slab is shallowed; this is along the western part of the site. GLAAS confirmed that the archaeological work on site was not complete, and any further excavation in the western part of the site should be monitored under archaeological watching brief conditions in accordance with the approved WSI.

Following discussions with the applicant an updated archaeological report was submitted by the applicant on 15/04/2024 which was prepared by MOLA dated December 2023. This advised that a watching brief has been carried out on the site between 13/08/2019 and 11/12/2019. In total 12 visits were carried out by MOLA however no records of the visits were available as the information appeared to have been lost. It advised that, as the majority of visits appeared to last under half a day, this suggested that little if anything was present to be recorded and MOLA ceased attending visits following a request from the contractors in early December 2019.

Given the original concerns raised by GLAAS and the fact that the revised report does not provide any further required information, it is considered that the details do not adequately address the wording of the condition. As it is no longer possible to carry out any further archaeological investigation on the site it is not possible to discharge this condition.

It is therefore recommended to refuse the condition.