



## O2 MASTERPLAN Finchley Road London NW3 6LU

London Borough of Camden

Addendum: Archaeological Desk-Based Assessment

January 2025



**O2 Centre  
Finchley Road  
Camden  
London  
NW3 6LU**

## **Archaeological Desk Based Assessment Addendum**

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### Sign-off history

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# Executive summary

*LS (Finchley Road) Limited has commissioned MOLA to produce an Addendum for the 2022 Archaeological Desk-Based Assessment ahead of proposed development at the O2 Centre, Finchley Road, in the London Borough of Camden. The Desk-Based Assessment issued in January 2022 provided the baseline archaeological data for the Site and an assessment of impact of the proposed development on archaeological remains. This Addendum supports a Section 73 application which seeks to vary planning permission ref. 2022/0528/P, granted on 20 December 2023, in respect of the O2 Masterplan Site. This Addendum also assesses the impacts of proposed severability of Plot S8, which is not currently owned by the applicant.*

*The proposed amendments to the consented scheme comprise additional height to a number of the blocks; reduction of typical floor to floor heights; reconfiguration of N4 and N5 leading to a smaller N4 building footprint and removal of N4D; new mix for affordable units in N4; market rent tenure is consolidated to buildings N5 and N3E only; an increase in total residential units within Phase 1 and associated increase in affordable units.*

*There is no change to the archaeological potential of the Site or the impact of proposals on buried heritage assets presented in the 2022 Desk-Based Assessment. Historically, the Site was located away from any settlement and within either woodland or farmland. Given the relatively shallow depth of the underlying natural geology, it is likely that development in the Site from the late 19th century onwards will have removed or severely truncated any earlier archaeological remains, and there is considered to be a low potential for remains of all periods other than the early/mid-20th century.*

*The main impact of the scheme is likely to be from the demolition of the existing buildings where this extends below ground; basement excavation; and new piled foundations. These works would completely remove any archaeological remains within the footprint of the basements and each pile. Excavation for all associated foundations, e.g. floor slab, pile caps, ground beams, and utilities is also likely to have a substantial impact on any surviving archaeological remains.*

*The proposed Section 73 scheme introduces no new or additional impacts compared with the consented scheme. Further, the severance of S8 would also introduce no new or additional impacts. Thus, given that no conditions regarding archaeology were attached to the 2023 permission and that the revised scheme introduces no new or additional impacts, it is anticipated that no conditions regarding archaeology would be attached to a grant of consent for this application.*



# 1 Introduction

## 1.1 Origin and scope of the report

- 1.1.1 This Archaeological Desk-Based Assessment (DBA) Addendum has been prepared by MOLA on behalf of LS (Finchley Road) Limited (“the Applicant”), to support a Section 73 application which seeks to vary planning permission ref. 2022/0528/P, granted on 20 December 2023, in respect of the O2 Masterplan Site (“the Site”) within the London Borough of Camden (“LBC”) (Fig 1). Whilst the Section 73 application will grant a new planning permission for the entire Site, amendments are only proposed to the Detailed Element. The Outline Elements will be unaffected by the proposed changes except for a reduction in the maximum residential floor area proposed.
- 1.1.2 The Site is subdivided into 10 Development Plots (N1, N2, N3, N3-E, N4, N5, N6, N7, S1 and S8). These are identified on Parameter Plan ref. 19066\_X\_(02)\_102. The 10 plots sit within three indicative phases.
- 1.1.3 The proposed Section 73 amendments relate to Development Plots N3E, N4 and N5 (Fig 2– Fig 8), and the associated landscaping, access roads and infrastructure. These plots are located in the centre of the Site and are approved in detail as they form the first phase of the development – the “Detailed Element”. The Detailed Element of the Site extends to 1.79ha.
- 1.1.4 Development Plots S8, N7 and N6 located in the west of the Site are approved in outline and form “Outline Element West”. Development Plots N3, N2, N1 and S1 located in the east of the Site are approved in outline and form “Outline Element East”. These plots together are referred to as the “Outline Elements.” The Outline Elements are not affected by the amendments proposed as part of this Section 73 application except for a reduction in the maximum residential floor area proposed.
- 1.1.5 The amendments proposed as part of this Section 73 application are herein referred to as the “Proposed Development”.
- 1.1.6 In summary, the Section 73 design amendments relate principally to the Detailed Element and involve adjustments to the height, massing and footprints of the buildings; the replacement of Block N4D with a two storey community centre; new landscaping and additional public realm; revisions to architecture; and revisions to unit mix and internal layouts. Overall, there is an increase in floorspace of 5,766 sqm (GIA) for the Detailed Element compared with the Approved scheme, an increase of 42 residential units, an increase in the size of the community centre and a slight reduction in commercial floorspace (-8 sqm GIA). The affordable housing provision remains the same at 36% of the floorspace (GIA).
- 1.1.7 While there is an increase in the floorspace proposed in the Detailed Element, there is a corresponding reduction in floorspace in the Outline Elements such that overall, there is no change proposed to the total floorspace permitted for the O2 Masterplan as a whole, apart from an 8sqm (GIA) reduction in commercial floorspace from the Detailed Element.
- 1.1.8 While there is an increase in the floorspace proposed in the Detailed Element, there is no change proposed to the total floorspace permitted for the O2 Masterplan as a whole.
- 1.1.9 The Proposed Description of development is as follows:  
*“Application under Section 73 of the Town and Country Planning Act 1990 (as amended) to vary Conditions I4 (Severability Condition), AD1 (Approved Drawings - Masterplan), AD2 (Approved Drawings - Reserved Matters), AD3 (Approved Drawings - Phase 1), RM1 (Parameter Plans and Development Specification), RM6 (Phasing Plan), RM11 (Reserved Matters – Access Statement), RM21 (Reserved Matters – Total floorspace), D20 (Photo-voltaic Cells), D21 (Phase 1 Long Stay Cycle Parking), D22 (Phase 2 Short Stay Cycle Parking), D24 (Phase 1 Disabled Car Parking), D26 (Phase 1 Fire Safety Implementation of Approved Measures), and M28 (Phase-Wide Lighting Strategy) and the removal of Conditions M6 (Enabling Works) and M7 (Major Utilities Infrastructure) of planning permission ref. 2022/0528/P dated 20 December 2023 for ‘Detailed planning permission for Development Plots N3-E, N4, and N5 and Outline planning permission for Development Plots N1, N2, N3, N6, N7, S1 and S8, including demolition of all existing structures and associated works, and redevelopment to include residential development (Class C3), commercial, business and service uses (Class E), local community uses (Class F2), and Sui Generis leisure uses (including cinema and drinking establishments) together with all landscaping, public realm, cycle parking and disabled car parking, highway works and*

*infrastructure within and associated with those Development Plots, in accordance with the Development Specification. For the avoidance of doubt, the Detailed and Outline planning permission are separate and severable for each of the Plots shown on plan P011 and the description of development on any decision notice issued pursuant to the application would reflect that', to allow for amendments to the Detailed Element (Plots N3-E, N4 and N5) including additional height, alterations to the design, massing and footprint of the buildings; the replacement of Block N4D with the relocated community centre; additional residential floorspace (and corresponding reduction in floorspace within Outline Elements); revisions to unit mix and internal layouts; additional community (Class F2) floorspace, reduction in retail (Class E,a) floorspace, reduction in professional services (Class E,c) floorspace, additional blue badge parking and cycle parking; revised landscaping and additional public realm; and associated works”.*

- 1.1.10 Full details and scope of the Section 73 application are described in the submitted Planning Statement Addendum, prepared by Gerald Eve LLP and the Design and Access Statement prepared by GRID.
- 1.1.11 Plot S8 (Builder’s Yard, Fig 1) is not currently owned by the applicant and a proposed severability plan has therefore been produced in the event that this plot is severed from the wider planning permission.
- 1.1.12 This document forms an addendum to the Archaeological DBA of O2 Centre, Finchley Road NW3 (National Grid Reference: TQ260847), which was issued by MOLA in relation to the application for the proposed scheme in January 2022 (MOLA 2022, hereafter referred to as “the 2022 DBA”). The addendum considers the Proposed Amendments for this development which comprise:
- Additional height to a number of the blocks;
  - Reduction of typical floor to floor heights from 3250mm to 3150mm;
  - Reconfiguration of N4 and N5 for improved design rationalisation, leading to a smaller N4 building footprint and removal of N4D;
  - New mix for affordable units in N4, which works better with the site limitations and has a higher portion of three bed apartments to match LBC preference/requirements;
  - Market rent tenure is consolidated to buildings N5 and N3E only. Removal of market rent tenure from N4 allows this block to become fully affordable;
  - An increase in total residential units within Phase 1 and associated increase in affordable units.
- 1.1.13 The Addendum also assesses any new information which has come to light which would affect the archaeological baseline and impact assessment produced for the 2022 DBA. The Addendum deals solely with the archaeological implications of the proposed development and does not cover possible built heritage issues (e.g. listed buildings or their setting), except where buried parts of historic fabric are likely to be affected.
- 1.1.14 Permission for the Proposed Development was granted in December 2023 and did not include any conditions relating to archaeology.
- 1.1.15 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (MHCLG 2024; see section 2 of this report) and relevant local planning policies. It conforms to standards and guidance by the Chartered Institute for Archaeologists (CIfA 2020), Historic England (EH 2008, HE 2015, 2017, 2019), the Greater London Archaeological Advisory Service (GLAAS 2015); and to online guidance on enhancing and conserving the historic environment (DCLG 2014 and DLUHC 2019. Under the ‘Copyright, Designs and Patents Act’ 1988 MOLA retains the copyright to this document.
- 1.1.16 Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author and MOLA, correct at the time of writing. Further archaeological investigation, more information about the nature of the present buildings, and/or more detailed proposals for redevelopment may require changes to all or parts of the document.

## 1.2 Aims and objectives

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- 1.2.1 The aim of the assessment is to:
- identify the presence of new known or potential buried heritage assets that may be affected by the proposals; and

- assess the likely impacts upon the significance of the assets arising from the amended proposals; and
- update the legislative context of the report in line with current planning policy; and
- where considered necessary, provide revised recommendations for further assessment of the historic assets affected, and/or mitigation aimed at reducing or removing completely any adverse impacts upon buried heritage assets and/or their setting.

## 2 Baseline information

### 2.1 Methodology

2.1.1 The methods used to produce the 2022 DBA were repeated as necessary for this Addendum.

### 2.2 Archaeological data

2.2.1 Results of a new search of the Greater London Historic Environment Record (GLHER) were received on the 14/01/2025 (GLHER ref. 18942) and contained no newly recorded monuments, findspots, or investigations within the 1km-radius study area used for the 2022 DBA.

### 2.3 Planning policy

#### *National Planning Policy Framework*

2.3.1 Since the 2022 DBA was issued, the National Planning Policy Framework (NPPF) was revised in response to the *Proposed reforms to the National Planning Policy Framework* and other changes to the Planning system consultation and was published by the Ministry of Housing, Communities & Local Government on the 12th December 2024. It sets out the government's planning policies for England and how these are expected to be applied. This revised framework replaces the previous NPPF first published in March 2012 and last revised in December 2023.

#### Conserving and enhancing the historic environment

2.3.2 The NPPF section 16, "Conserving and enhancing the historic environment" (NPPF paragraphs 202–221) is reproduced in full below:

**202.** Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

**203.** Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

**204.** When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

**205.** Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.



**206.** Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

### **Proposals affecting heritage assets**

**207.** In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

**208.** Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

**209.** Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

**210.** In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

**211.** In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

### **Considering potential impacts**

**212.** When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

**213.** Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

**214.** Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

**215.** Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

**216.** The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

**217.** Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

**218.** Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

**219.** Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

**220.** Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

**221.** Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

### *Camden Local Plan*

- 2.3.3 The draft new Camden Local Plan is in the final stages of consultation, and while the Policy number will change there will be no material policy changes relating to heritage. However, given that the draft Plan has been open to public consultation, it is a material consideration in planning applications.

### *Implications for the Proposed Development*

- 2.3.4 Neither the revised NPPF nor the draft new Camden Local Plan include any changes which would affect the conclusions of the 2022 DBA.