



ENGLISH HERITAGE

Development Planning
London Borough of Camden

Your Ref: 2013/3880/P

Our Ref: CLO11677

Contact: Sandy Kidd
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01 August 2013

f.a.o. Conor McDonagh

Dear Sir/Madam,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) NATIONAL PLANNING POLICY FRAMEWORK 2012

251-258 Tottenham Court Road

Erection of an eight storey building plus basement level for a mixed use development comprising retail use (Class A1) at part basement and ground floor levels and office use (Class B1) at part ground and first to seventh floor levels with associated plant in basement and roof, following complete demolition of existing retail/office buildings at 1 Bedford Avenue and 251-258 Tottenham Court Road.

Recommend Pre-Determination Archaeological Assessment/Evaluation

The above planning application has been noted by the Greater London Archaeological Advisory Service (GLAAS) as potentially affecting a heritage asset of archaeological interest.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision.

Appraisal of this planning application using the Greater London Historic Environment Record and information submitted with the application indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest.

I note that the applicant's 'buried heritage desk-based assessment' considers that the development of the site will have no impacts on buried heritage assets. However, the applicant's consultant was apparently unaware of an excavation carried out by

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Pre-Construct Archaeology at the British Museum in 2010 which located London's English Civil War defensive ditch on an alignment which if projected for just over 200m would bring it very close to or within the northern part of this site. Moreover there is documentary evidence for a fort or gun battery in this general area shown on Virtue's map of 1739. The Civil War defences are substantial and cannot be assumed to have been entirely destroyed by subsequent development. I therefore recommend that the DBA be revised to reconsider evidence for the English Civil war Defences and identify appropriate mitigation.

The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer appointed archaeological practice before any decision on the planning application is taken. The consultant's report will need to establish the significance of the site and the impact of the proposed development. Once the archaeological impact of the proposal has been defined a recommendation will be made by GLAAS.

The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation.

If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development. If planning permission is to be refused without the provision of a satisfactory archaeological assessment/evaluation then we recommend that the failure of the applicant to provide an adequate archaeological assessment be cited as a reason for refusal.

Further information on archaeology and planning in Greater London is available at: <http://www.english-heritage.org.uk/professional/advice/our-planning-role/greater-london-archaeology-advisory-service/about-glaas/>

Please note that this response relates solely to archaeological considerations. If necessary my Inspector of Historic Buildings and Areas colleagues should be consulted separately regarding statutory matters or Borough Conservation Officer as appropriate.

Yours sincerely

[REDACTED]

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