



Historic England

Mr Jonathan McClue
London Borough of Camden
Town Hall,
Camden Town Hall Extension,
Argyle Street,
Camden,
London,
WC1H 8ND

Our ref: CLO18701
Your ref: 2015/6955/P
Telephone 0207 973 3242
Email laura.o'gorman@HistoricEngland.org.uk

07 January 2016

Dear Mr McClue

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

**Panther House, 38 Mount Pleasant, The Brain Yard, 156-164 Gray's Inn Road,
London WC1X**

Redevelopment of existing buildings to provide part 4 storey and part 7 storey building following partial demolition of existing Panther House and Brain Yard buildings for a mix of Class B1a (office), A1 (retail) and A3 (restaurant/cafe) uses, provision of new 7 storey building at 156-164 Gray's Inn Road behind retained facade from existing building at 160-164 Gray's Inn Road to provide flexible Class A1/A3 (retail/restaurant) use at ground and basement levels and 13 self-contained residential units (C3) (4 x 1-bed, 7 x 2-bed and 2 x 3-bed) at upper floor levels.

Recommend Archaeological Condition(s)

Thank you for your consultation received on 18 December 2015.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter.

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 submit desk-based



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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. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.

The applicant has commissioned a Historic Environment Assessment (MOLA, December 2015) and a Heritage and Townscape appraisal (KM Heritage, December 2015) which have been submitted with the application. The documents indicate that the primary potential is for remains associated with the mid-18th century and later Holborn Union Workhouse, parts of which are still extant and are designated as a locally listed building as a result of its historical evidence. The site also lies close to the line of a Roman road, meaning that there is some potential for remains of Roman roadside activity.

Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a two-stage process of archaeological investigation comprising: first, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. The archaeological interest should therefore be conserved by attaching a condition as follows:

Condition No demolition or development shall take place until a stage 1 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, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, 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



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of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Then depending on the results of the evaluation either...

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

...Or...

Watching Brief

A watching brief involves the proactive engagement with the development groundworks to permit investigation and recording of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

Condition Building Recording

I also recommend that the following condition is applied...

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.

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



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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

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.

Further information on archaeology and planning in Greater London including Archaeological Priority Areas is available on the Historic England website.

Please do not hesitate to contact me should you require further information or assistance. I would be grateful to be kept informed of the progress of this application.

Please note that this response relates solely to archaeological considerations. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

Yours sincerely



Laura O'Gorman
Archaeology Advisor
Greater London Archaeological Advisory Service
Planning Group: London



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