



**Middlesex Hospital Annexe
Cleveland Street
London W1T**

London Borough of Camden

Historic environment assessment

February 2017



**MIDDLESEX HOSPITAL ANNEXE
44 Cleveland Street
London W1T**

Historic environment assessment

NGR 529272 181822

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Executive summary

Aecom has commissioned MOLA to carry out a historic environment assessment in advance of proposed development at the Middlesex Hospital Annexe, Cleveland Street, in the London Borough of Camden. The scheme comprises the redevelopment and refurbishment of the site to create a mixed use office and residential scheme. The late 18th century Grade II listed former Strand Union Workhouse building, along with the late 19th century north/south buildings are to be retained and refurbished with an eastwards extension of the existing basement (which covers c 40% of the site). In the east of the site, the existing late 19th century ward extensions are to be demolished and a new multi-storey office building constructed, with a new single basement across an additional c 40% of the site, and piled foundations. The site lies within the Charlotte Street Conservation Area; it is not within an archaeological priority area. There has been one past archaeological investigation within the site; a watching brief in 2014. This monitored the excavation of five test pits and identified a number of buried structural remains relating to former phases of the workhouse. Only one test pit revealed human remains, in a brick feature containing disarticulated bone. No intact burials were found.

This desk-based study assesses the impact on buried heritage assets (archaeological remains). Although above ground heritage assets (historic structures) are not discussed in detail, they have been noted where they assist in the archaeological interpretation of the site. Buried heritage assets that may be affected by the proposals comprise:

- **Post-medieval burials** dating from the late 18th century to the mid 19th century (moderate potential for intact burials, high potential for disarticulated remains) of medium or high heritage significance;
- **Late 18th to mid 19th century structural remains** associated with former workhouse buildings in the site (high potential), of low to medium heritage significance.

The site has a low potential for remains of the Roman and medieval periods, when it was probably in open fields. There is a low potential for prehistoric remains as later ground disturbance is likely to have removed evidence for this period.

The survival of buried heritage assets is predicted to be varied and localised across the site. The foundations of earlier structures will have been truncated by more recent developments. Burials are unlikely to be located beneath the late 18th century workhouse, but may be present beneath later additions, including any basements, where the bases of other deeply cut features such as quarry pits or wells may also survive. There is a greater potential for survival in the eastern part of the site where impact levels are not as deep and where the earlier burial ground is most likely to have been located.

The excavation of the proposed basement would entirely remove any archaeological remains within its footprint to its formation level, with the exception of any deep burials, foundations, pits and wells. Piled foundations would remove any buried archaeological assets entirely within each pile footprint and, if particularly dense, make surviving remains preserved between piles inaccessible for future archaeological investigation. There would be additional impacts from pile caps beneath the slab formation level, lift pits and possibly also from demolition and new service and drainage trenches.

It is considered unlikely that the local planning authority would require field evaluation prior to the determination of planning consent. However in view of the uncertainty regarding the survival of human remains on the site and the large area which would be affected by the construction of the new basement, targeted field evaluation following consent is recommended in order to clarify the extent and condition of burials, and the likely impacts of the development. The results of the evaluation would allow an informed decision to be made in respect of an appropriate mitigation strategy for assets. Appropriate excavation would be required for any human remains that would be disturbed by the proposed development (i.e. full excavation for articulated remains). For disarticulated human remains full excavation may not be required and could be removed by an exhumation contractor under a watching brief. Mitigation for any other remains, if required, could comprise targeted archaeological excavation and recording in advance of construction, and/or a watching brief during the groundworks for remains of lesser significance. Any archaeological work would need to be undertaken in accordance with an approved archaeological Written Scheme of Investigation. Disturbance of human remains on land which is not subject to the Church of England's jurisdiction requires a licence from the Secretary of State, under Section 25 of the Burial Act 1857 as amended by the Church of England (Miscellaneous Provisions) Measure 2014.

1 Introduction

1.1 Origin and scope of the report

- 1.1.1 Aecom has commissioned MOLA (Museum of London Archaeology) to carry out a historic environment assessment in advance of proposed development at the Middlesex Hospital Annexe (the former Strand Union Workhouse), Cleveland Street W1T, in the London Borough of Camden (National Grid Reference 529272, 181822 : Fig 1). The scheme comprises the redevelopment and refurbishment of the site to create a mixed use office and residential scheme. The listed 18th century workhouse building along with the north/south buildings (19th century) are to be retained and refurbished with an extension of the existing basement to the east. In the east of the site the existing early 19th century ward extensions are to be demolished in advance of construction of a new multi-storey office building with a single level basement floor across 80% of the site.
- 1.1.2 This desk-based study assesses the impact of the scheme on buried heritage assets (archaeological remains). It forms an initial stage of investigation of the area of proposed development (hereafter referred to as the 'site') and may be required in relation to the planning process in order that the local planning authority (LPA) can formulate an appropriate response in the light of the impact upon any known or possible heritage assets. These are parts of the historic environment which are considered to be significant because of their historic, evidential, aesthetic and/or communal interest.
- 1.1.3 This report deals solely with the archaeological implications of the development and does not cover possible built heritage issues, except where buried parts of historic fabric are likely to be affected. Above ground assets (i.e., designated and undesignated historic structures and conservation areas) on the site or in the vicinity that are relevant to the archaeological interpretation of the site are discussed. Whilst the significance of above ground assets is not assessed in this archaeological report, direct physical impacts upon such arising from the development proposals are noted. The report does not assess issues in relation to the setting of above ground assets (e.g. visible changes to historic character and views). This archaeological report is not intended to support an application for Listed Building Consent or Conservation Area Consent.
- 1.1.4 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG, 2012, 2014; see section 10 of this report) and to standards specified by the Chartered Institute for Archaeologists (CIfA, 2014a, 2014b), Historic England (EH, 2008; HE, 2015), and the Greater London Archaeological Advisory Service (GLAAS, 2015). Under the 'Copyright, Designs and Patents Act' 1988 MOLA retains the copyright to this document.
- 1.1.5 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 Designated heritage assets

- 1.2.1 The site contains the Grade II listed late 18th century former Strand Union Workhouse (Middlesex Hospital Annexe). The site does not contain any scheduled monuments or registered parks and gardens. A Certificate of Immunity from Listing (No 1434178) was issued by the Secretary of State for Culture, Media and Sport on the 12th of May 2016 for the former Middlesex Hospital Annexe buildings to the north, south and rear of the Grade II listed frontage block.
- 1.2.2 The former Strand Union Workhouse (**HEA 1** on Fig 2) is designated for the following principal reasons:
- “Historic interest: for associations with renowned figures in mid-C19 workhouse reform, most notably Dr Joseph Rogers, whose direct experience here as Chief Medical Officer launched

him into the vanguard of the movement to reform Poor Law healthcare provision, a significant step towards the socialisation of medical care in Britain. It may also have provided inspiration for workhouses portrayed by Dickens in 'Oliver Twist' and later works * Rarity: as a survival of an C18 London parish workhouse, one of only three to remain * Architectural interest: while much altered internally, it remains clearly legible as a late-C18 Poor Law institution, whose austere yet imposing exterior eloquently announces its original purpose" (Historic England Listing 1242917)

- 1.2.3 The site does not lie within an archaeological priority area (APA), as designated by the local planning authority. The site is within the Charlotte Street Conservation Area, which was designated in 1974 and extended in 1981, 1985 and 1999. The area is cited as an important example of development in the Georgian period as a residential suburb and the subsequent social and economic changes that have affected patterns of use and occupation of the buildings (Camden Council, 2008).
- 1.2.4 GLAAS is currently re-assessing APAs throughout the London boroughs in line with new guidelines to link archaeological sensitivity tiers to specific thresholds for triggering archaeological advice and assessment. The London Borough of Camden's APAs are due to be reviewed this year (historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/).
- 1.2.5 The site is on land which was acquired by the parish of St Paul, Covent Garden in the late 18th century for use as a burial ground, and was consecrated (MoLAS 2008, 9). Since the site has been developed, it is likely that the legal effects of consecration (i.e. faculty jurisdiction) would be held to have expired, but this should be clarified with the Ministry of Justice before any development takes place. Disturbance of human remains on land which is not subject to the Church of England's jurisdiction requires a licence from the Secretary of State, under Section 25 of *the Burial Act 1857* as amended by the *Church of England (Miscellaneous Provisions) Measure 2014*.

1.3 Aims and objectives

- 1.3.1 The aim of the assessment is to:
- identify the presence of any known or potential buried heritage assets that may be affected by the proposals;
 - describe the significance of such assets, as required by national planning policy (see section 9 for planning framework and section 10 for methodology used to determine significance);
 - assess the likely impacts upon the significance of the assets arising from the proposals; and
 - provide recommendations for further assessment where necessary 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 Methodology and sources consulted

- 2.1.1 For the purposes of this report the documentary and cartographic sources, including results from any archaeological investigations in the site and a study area around it were examined in order to determine the likely nature, extent, preservation and significance of any buried heritage assets that may be present within the site or its immediate vicinity. This information has been used to determine the potential for previously unrecorded heritage assets of any specific chronological period to be present within the site.
- 2.1.2 In order to set the site into its full archaeological and historical context, information was collected on the known historic environment features within a 500m-radius study area around it, as held by the primary repositories of such information within Greater London. These comprise the Greater London Historic Environment Record (GLHER) and the Museum of London Archaeological Archive (MoL Archaeological Archive). The GLHER is managed by Historic England and includes information from past investigations, local knowledge, find spots, and documentary and cartographic sources. The MoL Archaeological Archive includes a public archive of past investigations and is managed by the Museum of London. The study area was considered through professional judgement to be appropriate to characterise the historic environment of the site. Occasionally there may be reference to assets beyond this study area, where appropriate, e.g., where such assets are particularly significant and/or where they contribute to current understanding of the historic environment.
- 2.1.3 In 2008, in advance of the designation of the 18th-century building by English Heritage (now Historic England), the Museum of London Archaeology Service (MoLAS, now MOLA) undertook an assessment of the buildings on the site in order to provide a statement of their architectural and historic interest (MoLAS, 2008). This included an account of the history of the site and buildings drawn from documentary sources, which has provided much of the background used in this report.
- 2.1.4 Adrian Miles (MOLA burials specialist) was consulted regarding burial research and the likely depth of human remains; his view was that the presence of human burials on the site would not be clarified by the Parish Records, as in most cases the place of burial is not specified. The measurement of the area of consecrated ground was provided in R. Richardson 2012, which is based on an undated plan of the original site and adjacent ownership. In addition, E. Brown's 1902 '*Saint Pancras Open Spaces and Disused Burial Grounds*' were consulted along with Mrs Basil Holmes's 1896 list of burial grounds.
- 2.1.5 In addition, the following sources were consulted:
- MOLA – in-house Geographical Information System (GIS) with statutory designations GIS data, the locations of all key indicators of known prehistoric and Roman activity across Greater London, past investigation locations, projected Roman roads and burial grounds from the Holmes burial ground survey of 1896; georeferenced published historic maps; Defence of Britain survey data, in-house archaeological deposit survival archive; and archaeological publications;
 - Pre-Construct Archaeology Ltd (PCA) – Archaeological watching brief report (Former Middlesex Hospital Annex)
 - Historic England – information on statutory designations including scheduled monuments and listed buildings, along with identified Heritage at Risk;
 - London Metropolitan Archives – historic maps and published histories;
 - Camden Local Studies Archive – historic maps and published histories;
 - Ancestry.com – parish burial records, London workhouse admission and discharge records (1738–1930);
 - Groundsure – historic Ordnance Survey maps from the first edition (1860–70s) to the present day;
 - British Geological Survey (BGS) – solid and drift geology digital map; online BGS geological borehole record data;
 - Aecom – architectural drawings (Llewelyn Davies, January 2017), engineering drawings (Aecom, 2016), existing site survey (Greenhatch group, /17-06-2010);

- Internet – web-published material including the LPA local plan, and information on conservation areas and locally listed buildings.

- 2.1.6 A site visit was not considered necessary for the purposes of this report, which focusses on below ground archaeological remains. Plans of the existing building were available, and the street frontages were viewed via Google Streetview. The standing building assessment made in June 2008 by MoLAS included photos of the buildings (exterior/interior).
- 2.1.7 Fig 2 shows the location of known historic environment features within the study area. These have been allocated a unique historic environment assessment reference number (**HEA 1, 2, etc**), which is listed in a gazetteer at the back of this report and is referred to in the text. Where there are a considerable number of listed buildings in the study area, only those within the vicinity of the site (i.e. within 50m) are included, unless their inclusion is considered relevant to the study. Conservation areas and archaeological priority areas are not shown. All distances quoted in the text are approximate (within 5m).
- 2.1.8 Section 10 sets out the criteria used to determine the significance of heritage assets. This is based on four values set out in Historic England's *Conservation principles, policies and guidance* (EH 2008), and comprise evidential, historical, aesthetic and communal value. The report assesses the likely presence of such assets within (and beyond) the site, factors which may have compromised buried asset survival (i.e. present and previous land use), as well as possible significance.
- 2.1.9 Section 11 includes non-archaeological constraints. Section 12 contains a glossary of technical terms. A full bibliography and list of sources consulted may be found in section 13 with a list of existing site survey data obtained as part of the assessment.

3 Site location, topography and geology

3.1 Site location

- 3.1.1 The site is located at 44 Cleveland Street W1T (NGR 529272 181822: Fig 1). The site is bounded by Cleveland Street to the west, Middlesex House to the south, 38–40 Cleveland Street to the north and Astor College to the east. The site falls within the historic parish of St Pancras, and lay within the county of Middlesex prior to being absorbed into the administration of the Greater London Borough of Camden.
- 3.1.2 The site is 1.8km north-west of the modern bank of the River Thames, between two of its tributaries, the Tyburn, 930m to the west, and the Fleet 1.7km to the north-east. Both are now culverted underground. A small stream, which formerly rose 300m north-east of the site, flowed north-east into the Fleet (Barton 2016).

3.2 Topography

- 3.2.1 Topography can provide an indication of suitability for settlement, and ground levels can indicate whether the ground has been built up or truncated, which can have implications for archaeological survival (see section 5.2).
- 3.2.2 The general topography of the area is flat. A nearby Ordnance Survey spot height on Cleveland Street, 50m from the north-west boundary of the site is recorded at 27.2m above Ordnance Datum (OD), while 170m from the south-western corner of the site a spot height of 27.1m OD is recorded, again on Cleveland Street.
- 3.2.3 Within the site, existing ground levels are between 26.7–27.8m OD, slightly higher in the western part of the site than the east. Pavement level adjacent to the western side of the site is 27.4–27.8 (Greenhatch group, Topographical Survey, drwg no. 13514_11_P, rev A, dated June 2010 & Fig 13).

3.3 Geology

- 3.3.1 Geology can provide an indication of suitability for early settlement, and potential depth of remains.
- 3.3.2 The site is within the Thames Basin, a broad syncline (depression) of chalk filled in the centre with sands and clays. Above these lie the fluvial deposits of the Thames arranged in flights of gravel terraces, representing the remains of the river's former floodplains.
- 3.3.3 BGS digital data shows the geology of the site comprises Thames River Terrace Gravels of the Lynch Hill Terrace, overlying London Clay. The Lynch Hill Terrace runs in an east-west direction at c 20.0m OD or higher, and lies beneath much of Soho and the West End. It probably dates from the Wolstonian glaciation, c 250,000–150,000 years ago. In places the Gravels are capped by a fine-grained silt known in London as Langley Silt Complex ('Brickearth'), which was laid down as alluvium and/or wind-blown deposits during the last glaciation around 17,000 BC. This produced fertile soils but was often exploited for the manufacture of bricks and much has been removed by quarrying or by subsequent building development.
- 3.3.4 No geotechnical data were available for the site; consequently the estimated levels of natural on the site are based on BGS boreholes and past archaeological investigations in the vicinity, as outlined in Table 1. The closest boreholes were located at a distance of 60m north-west of the site centre (TQ28SE226/A, TQ28SE226/A-G). Although an archaeological watching brief was conducted within the site in 2014 (**HEA 1a**), none of the test pits (excavated to depths of 1.0–2.0mbgl) reached natural geology, so the next nearest investigation (**HEA 6**), at the former Middlesex Hospital 160m south of the site, was consulted. Table 1 differentiates between modern made ground, containing identifiably modern inclusion such as concrete and plastic, and undated made ground, which may potentially contain deposits of archaeological interest. In the case of the BGS borehole data this is an interpretation since they were commissioned

for engineering purposes and not archaeologically monitored.

- 3.3.5 No brickearth deposits were encountered during the borehole investigations or archaeological investigation. The highest Gravel deposits were encountered at 1.2m below ground level/bgl (26m OD) in borehole TQ28SE226/A–G, 60m north-west of the site, and between 2.5–3.2mbgl (23.8–25.5m OD) at Middlesex Hospital, (HEA 6), 160m south of the site. The top of any untruncated natural Gravels on the site and therefore might be assumed to be at a similar level, i.e. c 1.2mbgl (25.4m OD) or higher, although later ground disturbance may have truncated this level. If any brickearth has survived within the site, which seems unlikely, it would be encountered between the Gravel and the made ground.

*Table 1: summary of geotechnical data (BGS borehole data)
Levels are in metres below ground level (mbgl)*

BH/TP ref.	Modern made ground	Undated made ground	Top of natural (Gravel)
TQ28SE226 /A (60m NW)	-	<5.6	5.6 (21.6m OD)
TQ28SE226/A-G (60m NW)	-	<1.2	1.2 (26.0m OD)
TQ28SE981 (100m SW)	<2.1 (26.8m OD)	2.1–3.2 (24.7m OD)	3.2 (23.6m OD)
TQ28SE225/ AYQ28SE225	-	<5.8	5.8 (21.8m OD)

4 Archaeological and historical background

4.1 Overview of past investigations

4.1.1 There have relatively few investigations within the 500m study area; current understanding of area is therefore limited. The past investigations consist of eight watching briefs and two evaluations and recorded primarily post-medieval evidence.

4.1.2 One of these watching briefs was conducted within the site in 2014 (**HEA 1a**). It consisted of six trial pits, monitored archaeologically by Pre-Construct Archaeology Ltd and dug principally in order to determine the presence or absence of human remains on the site associated with the former 18th–19th century workhouse and parish burial ground, and to determine the depths of some existing foundations. The investigation did not record any remains for the prehistoric, Roman or medieval periods but did reveal post-medieval structural remains together with human bones found within a brick-lined feature. However, a test pit in the area where burials were reported in the mid 19th century during construction of the former wash-house/laundry found no evidence of burials. The watching brief did not encounter natural geology; a summary of the findings is presented below and the locations of the test pits can be seen in (**Fig 2a**) (PCA 2014).

- *Test Pit 1:* excavated to determine the depth of the footing for an existing basement. The earliest deposit was a layer of construction rubble thought to be related to the southwest wing of the hospital annexe during the last quarter of the 19th century. The layer was cut by a brick light well which had been built against the south-east wall of the hospital annexe. Three sides of the light well survived to a maximum height of approximately 26.7m OD (0.3mbgl). The concrete base of the light well was between 25.9m–26.2m OD (0.8–1.1mbgl).
- *Test Pit 2:* in the room at the north-east of the central wing outside of the area of the former 19th century washhouse. The test pit found the south-east corner of a brick building resting on a concrete footing (of unknown depth).
- *Test Pit 3:* excavated in the northern corner of the site within the lightwell between the central wings of the hospital. The earliest deposit recorded was a later of silty clay; encountered at a height of 25.4m OD (1.6mbgl). It is not stated in the original report whether this deposit represented natural geology. This was sealed by a 0.6m thick layer of sanding silt with frequent brick and tile flecks at a top level of 25.9m OD (1.1mbgl). This layer was cut by the construction cut for a brick floor at 25.9m OD (1.1mbgl) and walls at 26.2m OD (0.8mbgl).
- *Test Pit 4:* excavated to determine the nature and condition of the footing of the south-east wall of the central wing of the hospital annexe – due to the presence of the brick footing and extensive services, the test pit did not produce any archaeological data
- *Test pit 5:* excavated at the north-east end of the light well between the central and south-eastern wing of the hospital annexe. The earliest deposit was a layer of silty clay seen at 25.2m OD (1.8mbgl). It is not stated in the original report whether this deposit represented natural geology This was sealed by a layer of sandy silt encountered at 25.9m OD (1.1mbgl). Following the excavation of the test pit part of the south-west section of the pit collapsed revealing a 0.6m x0.5m north-west/south-east aligned vaulted brick lined feature at a height of 25.9m OD (1.1mbgl). The interior of the feature had been filled with disarticulated human bone and was sealed by a layer of brick and mortar rubble.
- *Test pit 6:* in the basement of the 18th century building at the south-western end of the site. The pit was excavated to a depth of 1.0m when a concrete slab was encountered; thought to be associated with a service channel.

4.2 Chronological summary

Prehistoric period (800,000 BC–AD 43)

- 4.2.1 The Lower (800,000–250,000 BC) and Middle (250,000–40,000 BC) Palaeolithic saw alternating warm and cold phases and intermittent perhaps seasonal occupation. During the Upper Palaeolithic (40,000–10,000 BC), after the last glacial maximum, and in particular after around 13,000 BC, further climate warming took place and the environment changed from steppe-tundra to birch and pine woodland. It is probably at this time that Britain first saw continuous occupation. Erosion has removed much of the Palaeolithic land surfaces and finds are typically residual. The GLHER includes the chance find of a Palaeolithic handaxe, c 350m to the south-west of the site (**HEA 16**). Further to this a possible Palaeolithic flint flake was found at University College Hospital, 480m to the north (**HEA 9**). Outside of the study area, 800m to the north-west an assemblage of Palaeolithic handaxes are recorded on the MOLA GIS prehistoric key indicators layer (Monument no. 966693).
- 4.2.2 The Mesolithic hunter-gather communities of the postglacial period (10,000–4000 BC) inhabited a still largely wooded environment. The river valleys would have been favoured in providing a predictable source of food (from hunting and fishing) and water, as well as a means of transport and communication. Evidence of activity is characterised by flint tools rather than structural remains. There are no known finds dated to this period within the study area.
- 4.2.3 The Neolithic (4000–2000 BC), Bronze Age (2000–600 BC) and Iron Age (600 BC–AD 43) are traditionally seen as the time of technological change, settled communities and the construction of communal monuments. Farming was established and forest cleared for cultivation. An expanding population put pressure on available resources and necessitated the utilisation of previously marginal land. The GLHER records the findspots of two Neolithic polished stone axes (**HEA 17 & 18**) near Gower Street, 425 and 450m north-east of the site.
- 4.2.4 Although the light fast draining soils on the Gravel terrace would have been attractive to early settlement, there is currently no evidence for prehistoric settlement within the study area. It is possible; however, that later activity has removed remains from this period. Oxford Street, 530m to the south is thought to have followed the line of a prehistoric trackway (later being a Roman road), although there is currently no archaeological evidence to support this.

Roman period (AD 43–410)

- 4.2.5 Within approximately a decade of the arrival of the Romans in AD 43, the town of *Londinium* had been established on the north bank of the Thames where the City of London now stands, c 2.6km south-east of the site. It quickly became a major commercial centre, and the hub of the Roman road system in Britain. A network of roads stretched out from *Londinium*, and the basic pattern of the Roman road system was defined during this early period. Small settlements, typically located along the roads, acted as both producers and markets for the town (AGL 2000, 150). Modern Oxford Street, running east-west 530m south of the site, follows the line of a major Roman road, and findspots of Roman artefacts suggest that a small settlement grew up at the point where the road crossed or forded the Tyburn, c 1.1km south-west of the site. Within the study area the GLHER records three separate chance findspots in the vicinity of 151 Great Portland Street, 320m to the north-west (**HEA 19**), all of Roman date, including seven incomplete bone pins, an Iron Brooch and a small plate fragment.
- 4.2.6 Any settlement or buildings alongside the road are unlikely to have extended as far as the site, which was probably within open – possibly cultivated – land, or woodland, during this period. There have been no archaeological features and only three chance finds of Roman date recorded in the study area.

Early medieval (Saxon) period (AD 410–1066)

- 4.2.7 Following the withdrawal of the Roman army from England in the early 5th century AD, *Londinium* was apparently abandoned. Germanic ('Saxon') settlers arrived from mainland Europe, with occupation in the form of small villages and an economy initially based on agriculture. By the end of the 6th century a number of Anglo-Saxon kingdoms had emerged, and as the ruling families adopted Christianity, endowments of land were made to the church.

Landed estates (manors) can be identified from the 7th century onwards; some, as Christianity was widely adopted, with a main 'minster' church and other subsidiary churches or chapels. The main Saxon settlement of *Lundenwic* flourished in the 7th to 9th centuries in the area of what is now Covent Garden and the Strand, c 1.1km to the south-east of the site. In the 9th and 10th centuries, the Saxon Minster system began to be replaced by local parochial organisation, with formal areas of land centred on settlements served by a parish church.

- 4.2.8 The site lay within the extensive manor (estate) of St Pancras. St Pancras Old Church stands beside the River Fleet (now underground) at the northern end of Pancras Road, c 1.7km to the north-east of the site. The church was believed to have been founded on land given by King Ethelbert to St Paul's Cathedral in AD 604 (VCH *Middlesex* I, 122). The church would have formed a focus for settlement, the exact location and extent of which is not currently known.
- 4.2.9 The main St Pancras manor was eventually broken up into smaller estates. The site fell within the Tothele manor in the north-west, which Domesday Book (AD 1086) describes as containing 5 hides, enough woodland to support 150 pigs and herbage (pasture). The main settlement of Tothele is thought to have been located at the northern end of Tottenham Court Road, north of Euston Road, c 1.1km to the south-east of the site. The manor was held by the Bishop of London, and supplied part of the income of the Canons of St Paul's (Domesday, eds Williams and Martin 1992, 360). Despite the large size of the manor of Tothele the location of other Saxon settlements is unknown.
- 4.2.10 No early medieval features or findspots have been recorded in the study area, and the site is likely to have been within woodland, or possibly cultivated land, during this period.

Later medieval period (AD 1066–1485)

- 4.2.11 The manor within which the site is located became known as Tottenhall, and covered the majority of the western side of St Pancras parish (*Survey of London* xix, 1–31). The site was at some distance from the manorial centre, and from the built-up area of the City of London and Westminster: later cartographic evidence suggests that it remained open land, probably cultivated, during this period. No later medieval features have been recorded in the study area; however the GLHER records the chance find of a medieval iron purse frame (**HEA 13**), 460m to the south-east and three spurs 350m to the south-east (**HEA 20**) close to Tottenham Court Road.
- 4.2.12 Only limited residual medieval finds have been recorded in the study area. It is likely that the site was in woodland, or possible cultivated land away from the main areas of settlement during this period.

Post-medieval period (AD 1485–present)

- 4.2.13 The immediate area of the site remained relatively rural until the 18th century; to the south was Oxford Street to the south, in origin a Roman road, and to the north Tottenhall Manor house, or Tottenham Court. Rocque's map of 1746 (Fig 3) shows the site as occupying open fields north of Oxford Street and west of Tottenham Court Road. The site is bounded to the west by 'The Green Lane', later Cleveland Street, which leads in a south-easterly direction to Oxford Street. On the opposite side of this lane from the site is a square plot of land used as cultivation or formal gardens with rows of trees/orchards visible. To the west, north-east and south of the site large quarry pits are evident, together with a number of large ponds which may be flooded former quarry pits. By the mid 18th century, the growth of urban London was giving rise to a huge demand for building materials; as such the gavels and brickearth on the fringes of the urban area were extensively quarried. Most of the area around the site was still open land at this time with the development of urban London visible further south-west of the site, centred around Oxford Street. Cleveland Street, adjacent to the western side of the site, was built around 1746–70 on landed owned by Charles Fitzroy, Duke of Southampton, son of Charles II's Duchess of Cleveland (Weinreb and Hibbert 1995, 195).

Covent Garden Workhouse 1775–1836

- 4.2.14 Records held by City of Westminster Archives Centre (CWAC) show that in 1774 the vestry of the parish of St Paul, Covent Garden decided to build a new workhouse for the poor of the parish. Accordingly the vestry commissioned plans and estimates from Edward Palmer of St Clement Danes, a surveyor, which he prepared in consultation with two vestrymen, Mr

Stephens and Mr Twinkler. Palmer's estimate for a building to house 200 people was £3,000 and his fee was two guineas (£2 2s) (CWAC: H805, 320). The vestry apparently had the present site already in mind, for they sought approval of the plans from Robert Palmer, the Duke of Bedford's 'principal steward' and agent in redeveloping his estate.

- 4.2.15 The Bedford estate at first leased the land to the parish, from at least 1775, when the parish had raised £5,000 on loan and construction of the workhouse presumably began. The parish acquired the freehold of the land in 1788; (Survey of London 1970, 57). The cost was £7,000, according to vestry minutes of 1787 (CWAC: H805), and was completed in or before 1778, by which time parish schools for boys and girls were installed in it (*Survey of London* 1970, 61).
- 4.2.16 The Covent Garden vestry had obtained an act of Parliament in May 1775 (15 Geo II c.50) 'to enable the inhabitants of the parish... to purchase a piece of ground for a workhouse and for providing an additional burial ground for the parish.' An act of parliament would have been required first for the parish to raise the necessary funds and incur a debt that would be repaid by means of future local tax revenue, and secondly in this case to create a consecrated burial ground. At this time the parish burial ground was consecrated and opened on the site; initially the land had been acquired on a 99-year lease, but the Anglican Church declined to consecrate the land for burial unless St Pauls, Covent Garden owned the land outright. An undated plan reproduced in Urban Council's 2017 *Heritage Statement* and assumed to date from the Workhouse's earliest foundations, delineates the area of ownership (Steven Bee, Urban Counsel, 2.5, 20th January 2017). The site's northern boundary is shown as 167 feet and the southern 162 feet with both sides shown as 200 feet which works out as an area of 3057 square metres, which is consistent with the application site boundary (3,059 square metres). Although the Historic England listing (**HEA 1**) gives the date of consecration as 1788, Richardson (2012: 76) describes a ceremony which took place in April 1790, during which the entire plot (except for the footprint of the original workhouse) – i.e. corresponding to the current site outline – was consecrated. The burial ground continued in use until 1853 when it was closed by an order of Council (Higginbotham 2014).
- 4.2.17 As Rocque's 1746 map shows, the area to the south of the site (just to the south of the area shown in Fig 3), which included the parish of St Paul, Covent Garden, was already heavily built up and the present site, although in a different parish, that of St Pancras, was probably the nearest open space available; interestingly, a new voluntary general hospital, the Middlesex Hospital, had been constructed just to the south from 1755, for much the same reason; the Middlesex Hospital acquired 25 acres (c 10 ha) of land, 160m south-west of the site (**HEA 6**), and constructed new buildings which were enlarged throughout the late 18th and 19th centuries (*ibid*, 531).
- 4.2.18 Horwood's 1799 map (Fig 4) shows the Covent Garden Workhouse in the form of a large building, H-shaped in plan, with the north and south wings extending to the rear (east) for about three times the distance they project to the front (west), towards the street. The map shows another much smaller building in the south-west corner of the site, end-on to the street, with possibly a wall or gate connecting it to the main building. Around the north-east corner of the site two adjoining terraces of buildings, apparently stables or carriage houses fronting on to Howland Mews to their north seem to encroach a little on to the workhouse site. It is assumed that at this time the open area surrounding the workhouse was in use as a burial ground.
- 4.2.19 Tompson's map of the parish of St Pancras, 1801 (Fig 5), shows the same two buildings. There is an additional building shown on this map in the north-west corner. The open area to the north and east of the main building is subdivided into three areas, possibly separated by walls. The buildings around the north-east corner of the site no longer seem to encroach a little into the workhouse site, whereas on Greenwood's later map of 1824–26 (Fig 6) they do. The reason for this discrepancy is not known. Greenwood's map also suggests that, by this time, the northern wing of the principal building extended further east than the southern wing.

Strand Union Workhouse 1836–1872

- 4.2.20 By the time of Stanford's 1862 map (Fig 7) the site is now marked as the 'Strand Union Workhouse'. The central building's southern wing now appears to extend eastwards to connect to the adjacent buildings. The parish of St Paul, Covent Garden was united with other parishes in Westminster to form the Strand Union in 1836 hence the change of name. By this time the charity schools had left the site and children dispersed (*Survey of London* 1970, 61). The burial ground had presumably been in use until 1853, when it was closed by an order of council

(Higginbotham 2014).

- 4.2.21 An account by Dr Joseph Rogers describes the layout of the site from 1856–1868, and also comments on building modifications of the workhouse. His account also provides information regarding the presence of burials, which were discovered during excavation for the laundry room foundations (Rogers 1889, 3–10):
- ‘On the right side of the main building was a badly paved yard, which led down to the back entrance from Charlotte Street; on each side of this back entrance there was – first, a carpenter’s shop and a dead-house, and secondly, opposite to it, a tinker’s shop with a forge and unceiled roof. This latter communicated with a ward with two beds in it, used for fever and foul cases, only a lath and plaster partition about eight feet [2.4m] high separating it from the tinker’s shop.’
- 4.2.22 Dr Rogers managed to persuade the Guardians to build a new laundry in the back yard, costing some £400, and to enlarge the cellars (1889, 13–14):
- ‘On proceeding to dig out the foundation [for the laundry], the workmen came on a number of skeletons, the yard having been originally the poor burial ground of St Paul’s, Covent Garden, for which the Workhouse, etc, had been built, and had been rented by the Guardians from that parish when the Strand Union was formed. So full was this yard of human remains, that the contractor was compelled to go down twenty feet [6.1m] all round, before a foundation for the laundry could be obtained’.
- 4.2.23 According to Dr Roger’s account, the foundations for the laundry house extended to a depth of 6.1m before solid ground was encountered (Higginbotham 2014). The archaeological watching brief within the site (**HEA 1a**), monitoring geotechnical trial pits notes that trial pit 2 in the location of the laundry did not produce any evidence of burials, although disarticulated bones were however recorded in trial pit 5 in the north-eastern part of the site within a brick lined vaulted feature. A reference states that the coffins and bones disturbed whilst digging the foundations were taken up and re-interred in the burial ground of St Martins, Pratt Street, Camden Town (Brown 1908: 18). The reference does not specify but is assumed to refer to the foundations of the laundry house.
- 4.2.24 Whilst not direct evidence of burial practices at the Strand Union Workhouse, a separate source by the same author provides a description of a comparable workhouse during this time; it states that between 1843 and 1845 at least 10,000 bodies were interred within the grounds of the St Giles Workhouse, in St Pancras Parish (Brown 1902: 43).
- 4.2.25 The Ordnance Survey 1st edition 5ft: mile map of 1872 (Fig 8) shows the site in further detail, along with the various functions of the separate buildings at this time, which is clarified by Dr Rogers’s account (see above). The central building consists of two symmetrical infirmary wards, one male and one female. The southern wing extension is used as a chapel, which connects with an additional infirmary ward along the eastern boundary of the site. In the north-east corner are wash room/laundry facilities, built on the former burial ground associated with the workhouse. A further infirmary ward lies adjacent to the west side of the northern boundary of the site, with workshops adjacent to the southern boundary.

Central London Sick Asylum 1873–1913

- 4.2.26 The recommendations of a public inquiry into conditions at this site, and a number of others, were largely implemented by the Metropolitan Poor Act of 1867, which among other things set up ‘sick asylums’ in London for the destitute sick (Rivett 1986). Although the inquiry had recommended closure of the present site, it was designated as the Central London Sick Asylum in 1873, and was to be rebuilt accordingly (LMA: 495/ 282–288). The number of patients the asylum was intended to hold is uncertain, but was presumably around 500.
- 4.2.27 At this time the site was completely rebuilt except for the late 18th century principal building, the front (west) half of which remained, as appears on the Goad Fire Insurance Plan of 1901 (Fig 9). The former workshops along the southern boundary of the site have been demolished, along with the wash house and laundry rooms in the north-east corner. The new buildings are those that are still extant on the site.

Cleveland Street Infirmary 1913–1924

- 4.2.28 By the beginning of the 20th century, advances in medical science, improved living standards and the development of general hospitals into institutions capable of providing surgical and medical care for all the population meant that the functions of a ‘sick asylum’ for the destitute

sick were becoming more limited in application. In 1913 Westminster City Council took over the site, which became known as Cleveland Street Infirmary (LMA: 495/282/288). After the First World War (1914–18) the poor law regime and its institutions were increasingly redundant.

- 4.2.29 The Ordnance Survey 3rd edition 25": mile map of 1916 (not reproduced) shows that the site remained much the same, the only noticeable change being a reduction in size/rebuilding of the building in the north-east corner.

Middlesex Hospital 1924–2006

- 4.2.30 Middlesex Hospital obtained the site in 1924 and reopened it in 1926. Subsequently parts of the site were altered, including a tunnel constructed between the central building and the rectangular building in the south-west (MoLAS 2008: 14). The London County Council's Bomb Damage Map of 1939–1945, map 61 (not reproduced) shows that the majority of the site sustained only blast damage, apart from the northern wing which was 'seriously damaged, but repairable at cost'. The Ordnance Survey 1:1250 scale map of 1951 (Fig 10) shows a number of changes to the buildings around the edges of the site (within the site). The northern wing is now connected at its western end to the buildings along the northern boundary, while a narrow covered passage now connects these buildings to the building in the north-east, blocking the entrance via Howland Mews West. A more substantial long narrow building now connects the eastern ends of the north and south ranges, adjacent to the eastern boundary of the site, while a further covered passageway links the buildings adjacent to the southern site boundary. The building towards the centre of the western boundary of the site has gone, but two new, small buildings have been added in the north-west and south-west corners.
- 4.2.31 The Middlesex Hospital was closed in 2006, and the present site was presumably closed then or shortly before. Fig 13 shows the current plan of the former Middlesex Hospital Annexe and reflects the subsequent changes that occurred following the Second World War. The most significant changes are along the northern edge of the site where the building towards the centre has been extended or rebuilt, leaving a narrow passage between this building and the northern wing, these buildings are single-storey and date to the 20th century; and are not expected to have deep foundations. Portacabins now occupy the central part of the site.

5 Statement of significance

5.1 Introduction

- 5.1.1 The following section discusses past impacts on the site: generally from late 19th and 20th century developments which may have compromised archaeological survival, e.g., building foundations or quarrying, identified primarily from historic maps, the site walkover survey, and information on the likely depth of deposits. It goes on to consider factors which are likely to have compromised asset survival.
- 5.1.2 In accordance with the NPPF, this is followed by a statement on the likely potential and significance of buried heritage assets within the site, derived from current understanding of the baseline conditions, past impacts, and professional judgement.

5.2 Factors affecting archaeological survival

Natural geology

- 5.2.1 There is no geotechnical data for the site. Based on BGS boreholes and the information from archaeological investigations in the vicinity, the predicted level of natural geology within the site is as follows:
- Current ground level is at 26.7–27.8m OD, slightly higher on the western side than the east;
 - The top of any untruncated Gravel is uncertain but is predicted at 25.5–26.6m OD (1.2mbgl) or higher, although later ground disturbance, including burials, is likely to have truncated this level across much of the site.
- 5.2.2 Between the top of the natural and the current ground level modern made ground and/or undated made ground would be anticipated. The latter may potentially contain remains of archaeological interest.

Past impacts

- 5.2.3 The survival of buried heritage assets is predicted to be varied and localised across the site, with a higher potential in areas where there have been no basements and minimal truncation from foundations. Where the existing buildings have basements (c 40% of the site), archaeological survival is likely to be low. Archaeological survival is predicted to be high in the small proportion of the site (c 20% of the site) which has not been built on, although the foundations of former buildings would be of archaeological interest. Elsewhere, archaeological survival is anticipated to be moderate to high, outside the truncation from existing foundations and basements.
- 5.2.4 Historic maps indicate that the site was open land until the development of the workhouse in the late 18th century – consequently the main impacts are associated with the construction of the workhouse and its subsequent alterations and additions.
- 5.2.5 There is an existing single basement in the western half of the site, occupying approximately 40% of the site. It is located underneath the late 18th century workhouse building but also extends to the east of this building, to the north and south, as far as the late 19th century North and South buildings and slightly to the west. In parts, it extends beyond the above ground footprint of the existing building. The topographical surveys indicate that the basement finished floor levels are 25.7m OD in the north, 24.2m OD in the south and 25.0m OD underneath the central workhouse building. To the east, underneath the west end of the later 19th century wings, the basement has a finished floor level of 24.2m OD (Fig 15) (Greenhatch Group, drwg no 13514_10_P, rev A, dated June 2010). Assuming a slab thickness of 0.4m, the level of impact is between 23.8–25.3m OD. Basement excavation would have severely truncated or completely removed any archaeological remains present in its footprint, with the possible exception of the bases of deeply cut features like pits and wells or deep grave cuts (Dr Rogers in 1889 noted that, because of the number and depth of the burials within the yard, contractors had to extend the foundations for the laundry house in the north-east corner of the site to a

depth of 6.1m before solid ground was encountered). Grave cuts are unlikely within the footprint of the original late 18th century workhouse building, however, as burials would have been made outside this building.

- 5.2.6 Across much of the rest of the site there are later 19th century and 20th century buildings, including the east–west wings extending from the central workhouse building. These are not known to have basements underneath their whole footprint (just the western ends) but would be expected have standard pad or strip foundations extending to a depth of at least c 1.0–1.5mbgl. However it should be noted that the foundations of these buildings may extend to a greater depth due to the possible presence of burials during construction (as noted by Dr. Rogers in 1889).
- 5.2.7 Investigations on the site revealed that in the restricted open areas of the site a number of services routes were present, which would have had an impact on the upper levels of any potential archaeological horizons, removing any archaeological remains within their footprint to a depth of 1.0–1.5mbgl (PCA 2014: 17).
- 5.2.8 Map and other documentary evidence shows that the area was used in the 18th century for quarrying brickearth or gravel – if present on the site, quarrying activities would have removed any earlier archaeological remains within their footprint. The quarry backfill would still have potential for archaeological remains of later date.

Likely depth/thickness of archaeological remains

- 5.2.9 Based on the results of the previous investigations within the site (PCA, 2014), structural remains relating to earlier phases of the workhouse and its outbuildings would be expected at levels between 25.9–26.7m OD or deeper where human remains were previously found. Elsewhere, in the lightwells, a 0.6-0.7m thick layer of silty clay was recorded at 25.9m (0.7mbgl) overlying a layer of sandy silt at 25.2–25.4m OD (**HEA 1a**, Test pits 3, 5). If any human remains survive on the site they would be expected below any undated made ground or possibly beneath surviving post-medieval structural remains, potentially to a depth of 6.1m.

5.3 Archaeological potential and significance

- 5.3.1 The nature of possible archaeological survival in the area of the proposed development is summarised here, taking into account the levels of natural geology and the level and nature of later disturbance and truncation discussed above.
- 5.3.2 *The site has a low potential to contain prehistoric remains.* The site lay on dry ground, but at some distance from the resources of the Thames and its tributaries. The area may have been used for hunting or cultivation. Few prehistoric finds have been recorded in the vicinity, and much of the site has been subject to post-medieval development. Additionally, the site's use as a burial ground in the post-medieval period is likely to have severely affected any survival of the prehistoric land surface.
- 5.3.3 *The site has a low potential to contain Roman remains.* It lay at some distance from the known areas of settlement and the road network and in all likelihood would have been in open fields or woodland. Only three Roman chance finds are recorded in the vicinity and there have been no cut features identified in the study area.
- 5.3.4 *The site has a low potential to contain early medieval remains.* The site probably continued as open land or woodland during the period; there is no evidence for occupation in the immediate vicinity.
- 5.3.5 *The site has a low potential to contain later medieval remains.* The site was located at a distance from the main areas of settlement during this period and there have been no medieval cut features or deposits in the study area.
- 5.3.6 *The site has a high potential to contain post-medieval remains.* Historic mapping shows that the site was developed from the late 18th century onwards as the Covent Garden Workhouse and later the Strand Union Workhouse. Recent investigations within the site have established the survival of earlier phases of the workhouse in the form of wall footings, lightwells and cellars. Structural remains of the workhouse buildings would be of **low** to **medium** significance (depending on the nature, extent and survival) based on their evidential and historic value. Evidence of any earlier agricultural use of the site would be of **low** heritage significance.

5.3.7 *The site has a moderate potential for intact burials, and high potential for disarticulated remains.* Documentary evidence has shown that the site was used as a burial ground up until the mid 19th century and disarticulated bones have been discovered on the site during recent investigations. Historic records suggest that the entire plot was consecrated and used for at least a 70 year period; unfortunately documentary research has not established whether the consecrated burial ground was cleared after closure. There is only one known reference to the discovery of burials during later phases of construction, and it seems unlikely that all human remains have been removed from the site. The discovery of bones, albeit disarticulated, within the site during recent investigations means that the presence of human remains should be anticipated, outside the footprint of the original late 18th century workhouse building. Post-medieval burial remains would be of **medium** or **high** significance.

6 Impact of proposals

6.1 Proposals

- 6.1.1 The application proposes the redevelopment and refurbishment of the site to create a mixed use office and residential scheme. The late 18th century Grade II listed former workhouse building, along with the late 19th century north/south buildings, are to be retained and refurbished with an eastwards extension of the existing basement. In the east of the site the existing late 19th century ward extensions are to be demolished and a new multi-storey office building constructed, with a single basement and piled foundations. The existing basement covers c 40% of the site; the new basements would cover c 80 % of the site.
- 6.1.2 The footprint and floor levels of the existing basement underneath the workhouse and the north/south buildings are to be retained, with finished floor levels between 24.2–25.7m OD (1.0–3.6mbgl) (Fig 17, Fig 18) (Llewelyn Davies, LD15 078.00, drwg no P_GA_B1 dated 20-01-2017). Underpinning may be required at the rear (east) of the building to link with the new basement (Wallington D, Aecom *Pers. Comm* 13-02-2017)
- 6.1.3 To the east of the workhouse building a larger office building is proposed in place of the existing east/west wings. The building is currently proposed to house commercial offices and ancillary rooms across seven floors. A single basement would extend across, and beyond, the footprint of the new building. The finished floor level of the new basement is proposed to be 23.0m OD (3.7–3.8mbgl) (Fig 17, Llewelyn Davies, LD15 078.00, drwg no P_GA_B1 dated 20-01-2017). The proposed slab thickness is generally 0.4m thick but would be thicker at pile caps and lift pits. The structural slab level would be 22.9m for the new build basement floor and the impact level would be 22.5m OD based on a 0.4m thick basement slab (Aecom, 60516144 drwg no MHA-ACM-NB-XX-DE-S-00016, rev A, dated 16-12-16).
- 6.1.4 Piled foundations are proposed for the new building, including a secant pile wall along the perimeter of the basement (Aecom, 60516144 drwg no MHA-ACM-NB-B1-DR-S-00002, dated 16-12-16).
- 6.1.5 Lifts are proposed to serve the basement and above floors. The locations are shown on Fig 17.
- 6.1.6 Landscaping is proposed in the open areas in between the workhouse and the new office building and on Bedford Passage along the southern boundary of the site (Fig 17). The proposed ground levels are not currently known but are assumed to correspond with existing street levels.

6.2 Implications

- 6.2.1 The identification of physical impacts on buried heritage assets within a site takes into account any activity which would entail ground disturbance, for example site set up works, remediation, landscaping and the construction of new basements and foundations. As it is assumed that the operational (completed development) phase would not entail any ground disturbance there would be no additional archaeological impact and this is not considered further.
- 6.2.2 It is outside the scope of this archaeological report to consider the impact of the proposed development on upstanding structures of historic interest, in the form of physical impacts which would remove, alter, or otherwise change the building fabric, or predicted changes to the historic character and setting of historic buildings and structures within the site or outside it.
- 6.2.3 The site has a high potential for survival for burials and earlier phases of the workhouse building, dating to the late 18th century onwards, and a low potential for all other periods. The survival of buried heritage assets is predicted to be varied and localised across the site, with a high potential in areas where there have been no basements and minimal truncation from foundations, low potential within the existing basement footprint and moderate to high potential elsewhere.

Preliminary site works

- 6.2.4 Works carried out as part of the initial site set up, including demolition, the installation of site

fencing and welfare facilities, is assumed for the purposes of this assessment to cause ground disturbance to a maximum depth of 0.5mbgl.

- 6.2.5 This could extend into undated made ground, which potentially contains remains of archaeological interest, or the foundations of post-medieval buildings dating from the late 18th century onwards, and would entirely remove any remains to this excavation depth.

Breaking out foundation slab

- 6.2.6 Breaking out of the existing foundation/floor slab would potentially have an impact, truncating or removing entirely any archaeological remains directly beneath the slab. This might include earlier footing/foundations for the workhouse buildings and/or any burial remains present beneath made ground.

New basements

- 6.2.7 Any archaeological remains would be entirely removed within the footprint of the proposed basement, to a depth of 22.9m OD, though the bases of deeply cut features like pits and wells, and possibly very deep burials, could potentially survive below this level. There may be additional impacts from piling beneath the basement (see below). It is assumed for the purposes of this assessment that the basement would be excavated following the insertion of the perimeter wall secant wall, and prior to the insertion of piled foundations.
- 6.2.8 There are various impacts to archaeological remains associated with underpinning, including excavation around pre-existing foundations, auger drilling and insertion of mini piles. Any remains would be removed locally from the footprint of these works.

Piled foundations

- 6.2.9 Any archaeological remains within the footprint of each pile would be removed as the pile is driven downwards. The piling layout is not dense, subsequently; it is in effect likely to make surviving archaeological remains, potentially preserved between each pile, inaccessible in terms of any archaeological investigation in the future. There would be additional impacts from pile caps beneath the slab formation level.

Lift pits

- 6.2.10 The proposed lift pits would extend to an assumed depth of 1.5m below the foundation slab formation level. This would remove any archaeological remains that might have survived the basement excavation within the pit footprint to this depth.

7 Conclusion and recommendations

- 7.1.1 The site contains a late 18th century Grade II listed workhouse. It does not lie within a local authority archaeological priority area but does lie within a conservation area.
- 7.1.2 The main potential for the site is for the structural remains of late 18th century and later buildings shown on historic maps; there is also the potential for burial remains relating to the Covent Garden Workhouse, which was consecrated in 1778.
- 7.1.3 The proposed basement excavation across c 80% of the site would entirely remove any archaeological remains within its footprint to its formation level, with the exception of any deep burials, foundations, pits and wells. Piled foundations would remove any buried archaeological assets entirely within each pile footprint and, if particularly dense, make surviving remains preserved between piles inaccessible for future archaeological investigation. There would be additional impacts from pile caps beneath the slab formation level, lift pits and possibly also from demolition and new service and drainage trenches. Assets most likely to be affected are burial remains from the late 18th to mid 19th century (medium or high significance) and foundations of earlier phases of the workhouse dating from the late 18th century onwards, of low to medium significance.
- 7.1.4 Table 2 summarises the known or likely buried assets within the site, their significance, and the impact of the proposed scheme on asset significance.

Table 2: Impact upon buried heritage assets (prior to mitigation)

Asset	Asset Significance	Impact of proposed scheme
Post-medieval human remains relating to the Covent Garden Workhouse burial ground from the late 18th century to mid 19th century (possibly high potential)	Medium or high	Preliminary site works, breaking out of floor slab, excavation of basement, underpinning, piling, lift pits. Significance of asset reduced to low or negligible within the footprint of these works.
Post-medieval structural remains, i.e. foundations/cellars of the former workhouse ancillary buildings dating from the late 18th century onwards (high potential)	Low to medium	

- 7.1.5 It is considered unlikely that the local planning authority would require field evaluation prior to the determination of planning consent. However in view of the uncertainty regarding the survival of human remains on the site and the large area which would be affected by the construction of the new basement, targeted field evaluation following consent is recommended in order to clarify the extent and condition of burials, and the likely impacts of the development. The results of the evaluation would allow an informed decision to be made in respect of an appropriate mitigation strategy for archaeological assets. Appropriate excavation would be required for any human remains that would be disturbed by the proposed development (i.e. full excavation for articulated remains). For disarticulated human remains full excavation may not be required and could be removed by an exhumation contractor under a watching brief. Mitigation for other remains, if required, could comprise targeted archaeological excavation and recording in advance of construction, and/or a watching brief during the groundworks for remains of lesser significance. Any archaeological work would need to be undertaken in consultation with the local authority and in accordance with an approved archaeological Written Scheme of Investigation. Disturbance of human remains on land which is not subject to the Church of England's jurisdiction requires a licence from the Secretary of State, under Section 25 of *the Burial Act 1857* as amended by the *Church of England (Miscellaneous Provisions) Measure 2014*.

8 Gazetteer of known historic environment assets

- 8.1.1 The table below represents a gazetteer of known historic environment sites and finds within the 500m-radius study area around the site and listed buildings within a 50m-radius around the site centre. The gazetteer should be read in conjunction with Fig 2.
- 8.1.2 The GLHER data contained within this gazetteer was obtained on 10/02/2017 and is the copyright of Historic England 2017.
- 8.1.3 Historic England statutory designations data © Historic England 2017. Contains Ordnance Survey data © Crown copyright and database right 2017. The Historic England GIS Data contained in this material was obtained in October 2016. The most publicly available up to date Historic England GIS Data can be obtained from <http://www.historicengland.org.uk>.

Abbreviations

MoLAS – Museum of London Archaeology Service (now named MOLA)

DGLA - Department of Greater London Archaeology (Museum of London)

HER – Historic Environment Record

PCA – Pre Construct Archaeology

HEA No.	Description	Site code/ HER No.
1	<p>Former Strand Union Workhouse (Middlesex Hospital Annex), 44 Cleveland Street Grade II listed former 18th century workhouse. Built after 1775 and in use by 1788 as the workhouse of the parish of St Paul, Covent Garden. Architect probably Edward Palmer. Converted into an infirmary c 1870–75. Altered 1924. The Covent Garden Workhouse (as it was originally known) was built by the parish of St Paul, Covent Garden, under the St Paul Covent Garden Act (1775) replacing a building in Denmark Court (Exeter Street). The site was acquired on a lease from the Bedford Estate. The architect was probably Edward Palmer, surveyor and steward to the Duke of Bedford, who prepared earlier plans for a smaller workhouse on the site. It was finished in or before 1778, when the parish charity school had been established there. The Act stipulated that an additional burial ground be provided on the site, which was consecrated in 1788. In 1802 and 1819 tenders were obtained for building an infectious ward and an infirmary respectively, each to the design of Thomas Hardwick (these no longer survive). In 1836 the building became the workhouse for the Strand Poor Law Union, formed on 25 March 1835 under the Poor Law Amendment Act (1834) or New Poor Law which superseded the Poor Law of 1601. The Union comprised the parishes of St Paul, Covent Garden; St Mary-le-Strand; Precinct of the Savoy; St Clement Danes and the Liberty of the Rolls, joined by St Anne, Soho (1837) and St Martin-in-the-Fields (1868). The only other surviving workhouse from these parishes is that of St Anne Soho in Rose Street, now No 14 Manette Street.</p> <p>Former location of historic burial ground, consecrated in in 1778 for use by the Covent Garden Workhouse, occupying the site. Disturbed burials have been observed within the site during a watching brief, and in the past, during the construction of the laundry block in the late 19th century. An 18th century plan recording the extent of the consecrated area, depicts a large rectangular area, within which was the workhouse. The exact parameter of the burial ground and location of burials remains unclear, however the discovery of burials, and the plan of the consecrated land, clearly support that there was a burial ground at this site. It is not known whether the land was deconsecrated (MLO107854).</p> <p>A standing building assessment was carried out on the site of the Middlesex Hospital Annexe in June 2008 by MoLAS, which assessed the architectural and historic interest of the buildings on the site</p>	<p>LB1242917 MLO10742 4 MLO10785 4</p>
1a	<p>Former Middlesex Hospital Annex, Cleveland Street, W1T A watching brief was undertaken by PCA in May 2014; revealed evidence of the former workhouse and disarticulated burials. Despite earlier literature stating that many burials were encountered in the late 19th century when the laundry was built in the north-east corner, a test pit in this area only revealed the footings of this building, and no evidence of human remains. Natural geology was not reached.</p>	ELO14837

HEA No.	Description	Site code/ HER No.
2	<p>The King and Queen Public, 1 & 2 Foley Street, W1 Grade II listed corner public house. Built between 1890–1900, red brick with brown stone dressings, slate roof. Lively rather Frenchified Gothic design. 4 storeys and basement. Foley Street facade 4 windows wide finished off with triple group of gabled half dormers. Corbelled conical roofed tourelle to corner and irregular return to Cleveland Street approximately 3 windows wide.</p>	LB1066799
3	<p>45–49 Cleveland Street, W1 Grade II listed block of flats, dated to 1911. Red brick with blue brick bandings and stone dressings, tiled roof. Arts and Crafts Free Style. 4 storeys, basement and dormered attic. A symmetrical composition with broad single bay projecting wings and recessed centre 3 windows wide. Ground floor of wings with shop fronts framed by rusticated granite quoin press supporting deep stone fascias stopped by festooned panels and similar stone rustication flanking the arched central entrance in the setback centre with flush squared stone mullion-transom windows either side.</p>	LB1219525
4	<p>35–50 Rathbone Place, Soho, Westminster, London, W1 A watching brief undertaken in 2013 by MOLA. The watching brief monitored 38 geotechnical pits. The monitoring showed that the western part of the site contains the backfilled basements of now demolished 18th–19th century terraced housing. In the east and north-east of the site external and internal surfaces were observed overlying undated made deposits. In places these continued down for a further 3m indicating deeply cut features. A thin layer of 17th century soil was identified over the natural, which was sealed by a thick garden soil dated to the 17th–18th century. Overlying this was a demolition/levelling layer created in the 18th–19th centuries. Within the levelling layers were brick lined drains, cess pits and a soak-away.</p>	RAT13 ELO13635 ELO14013
5	<p>The Heal's Building, 196 Tottenham Court Road, Camden, London, W1T 7LQ Watching brief carried out at the Heal's Building by PCA in 2011. The watching brief consisted of four test pits which were trying to locate the extent of a disused fuel tank. The fuel tank was observed in only one of the test pits and no other archaeological deposits or features were uncovered. A subsequent evaluation was undertaken by MOLA in 2014 which recorded a thin layer of 17th century soil overlying the natural, which was sealed by a thick garden soil dated to the 17th–18th century. Overlying this was a demolition/levelling layer created in the 18th–19th centuries. Within the levelling layers were brick lined drains, cess pits and a soak-away.</p>	HGB11 ELO11990
6	<p>Mortimer Street/ Nassau Street/Riding House Street/Cleveland Street, Westminster, W1 Building recorded was undertaken MOLA between 2007–2008 at The Middlesex Hospital. It was founded in 1745 and the first building on the site was built in 1755. The oldest surviving building dates to 1870. A medical school was built in the north-east of the site in 1887, and a chapel was located centrally in the site by 1891.</p> <p>An evaluation was undertaken at Middlesex Hospital, Mortimer Street between the 13th August 2007 and the 6th August 2008 by MOLA. The site comprised four trenches. Three of the trenches were in the garden and revealed garden soils over natural whilst the fourth trench revealed a cellar wall. The wall was probably associated with the 18th century hospital.</p> <p>A subsequent watching brief was undertaken on works at the site of the former Middlesex Hospital in 2012 by MOLA. No significant archaeological deposits were observed due to the extent and depth of modern truncation. Post medieval structures were recorded to the south of the site and comprised the remains of a 19th century basement and a brick culvert. This is also the GLHER point location for the site of a 19th century hospital rebuilt around a chapel in 1927 after demolition of the original buildings.</p> <p>In 1745 the Middlesex Infirmary, a voluntary charitable hospital, was founded in rented houses near what is now Windmill Street, to accommodate the 'sick and lame of Soho'. In 1754 an adjacent site of 25 acres was acquired; in 1766 the west wing was added and in 1780 the east wing. In 1835 a medical school was built next to the west wing. The chapel was built in 1890, and the hospital was rebuilt in 1935 (Weinreb and Hibbert 1995, 531).</p>	MXH07 ELO13018 ELO13220 ELO13019 MLO18193

HEA No.	Description	Site code/ HER No.
7	Triton Square, Camden, Greater London, NW1 MoLAS watching brief on land adjacent to Triton Square in 2005. No archaeological deposits were encountered, as the current car park had truncated deposits in this area. Natural ground (brickearth) was encountered at 22.5m OD.	RPL05 ELO14977
8	30 Cleveland Street, Camden, London, W1 An archaeological watching brief was undertaken by Genius Loci Cultural Project Consultants in 2009. This was requested as a result of bones being unearthed during the hand digging of geotechnical test pits. The watching brief consisted of the observation of one trench and a test pit; some archaeological remains were revealed including animal bones, clay pipe stems, pottery sherds, oyster shells and ceramic building material. The pottery was dated to the late 19th century and early 20th century. The finds were mixed with modern debris and lay in a disturbed deposit, possibly the upper level of a domestic rubbish pit or midden (rubbish mound).	ELO1212 MLO75258 MLO75597
9	University College Hospital, Gower Street, London, WC1 MoLAS watching brief in 2001; the aim of the watching brief was to watch the controlled extraction of natural gravel and sand from these trenches in order to recover Palaeolithic remains. One possible piece of Palaeolithic struck flint was recovered from section cleaning. One small flint flake was found, the context in which it was found was slightly clayey and may represent a palaeochannel.	GWT01 ELO230 MLO75730
10	Stephen Street, London, W1 The excavation of a sewer trench in Stephen Street was monitored by the Department of Greater London Archaeology in 1977. No further details on LAARC.	ELO14696
11	University College London, Front Quad, Gower Street Camden, WC1E The site was once owned by Hans Winthrop Mortimer, MP for Shaftesbury from 1774–90 and a property speculator, who purchased arable land here and began to develop his small estate from 1800 with shops and housing. In 1824 the land was purchased from the Mortimer estate by a builder who planned to create a residential square to be called Carmarthen Square, but he was bought out in 1825 by the three benefactors of what would become University College London (UCL) as the site for the new university. UCL, the third oldest university in England after Oxford and Cambridge, was founded in 1826 as the University of London to provide university education without religious bias, and its three benefactors were Catholic, Jewish and Nonconformist. There was some opposition from the clerical establishment, but on 30 April 1827 the Duke of Sussex laid the foundation stone. The architect was William Wilkins who was later to build the National Gallery, selected through a public competition. However his design was not fully carried out and the building took place over a period of time although UCL opened in 1828. Not only was it the first English university to admit students of any race, class or religion, in 1878 it was the first to admit women on equal terms with men.	MLO10426 2
12	Wardour Street/Oxford Street/Tottenham Court Road, Camden/Westminster GLHER area location for part of the Civil War Defences of London, based on Sturdy, David, 1975 <i>The Civil War Defences of London</i> p334–p337. The 17th century Civil War defences of London included a complex of forts and batteries between Great Russell Street and Wardour Street. The location of these forts served to command traffic at the junction of Tottenham Court Road and Oxford Street, which were the main north-west and west routes. The forts and batteries appear to have cut Oxford Street, with all traffic having to go via Knightsbridge or Piccadilly although the precise location of the defences is not fully known.	MLO10401
13	South Crescent, Staffordshire House, Bloomsbury, Camden Site of King Albert's Hospital for Convalescent Belgian soldiers during WWI. King Albert's Hospital for Convalescent Belgian Soldiers opened on 4th December 1914, the first of five such establishments. It was located in Staffordshire House, Store Street and had been placed at the disposal of the War Office by the owners of the department store Bourne and Hollingsworth. Also GLHER findspot of a medieval iron purse frame – date of discovery unknown.	MLO10588 2 MLO71761

HEA No.	Description	Site code/ HER No.
14	<p>Royal National Orthopaedic Hospital, 234 Great Portland Street, London, W1N During World War One, the Royal National Orthopaedic Hospital offered 100 to 130 beds to the War Office for military cases (the first floor ward was retained for civilian cases). The first military patients were admitted in early October 1914. In February 1915 the War Office agreed that the military beds should be used only for orthopaedic cases requiring special treatment. By 1917 some 170 beds had been reserved for military patients. By 1918, at the end of the war, about 18,000 servicemen had been treated at the Hospital. The Ministry of Pensions requested that the Hospital take discharged disabled servicemen instead of serving ones.</p>	MLO10728 4
15	<p>Great Portland Street, Langham Street, Gildea Street (St Paul's church), City of Westminster St Paul's Church, for many years known as the Portland Chapel, was built in the 18th century on the site of the former Marylebone Basin reservoir in London. Today the site is occupied by the BBC and known as Brock House, originally the Philharmonic Hall. The building was constructed in 1766 or 1775–6 of brick with a stone steeple and consecrated in 1831. It was designed by S. Leadbetter for the Portland Estates. The Philharmonic Hall was built on the site of the church in 1907/08 to replace the St James's Hall in Regent Street which had been demolished in 1905.</p>	MLO10792 2
16	<p>Great Portland Street, Westminster GLHER findspot of a Palaeolithic handaxe (date and event unknown).</p>	MLO12957
17	<p>Gower Street, Westminster GLHER point location for the findspot of a Neolithic polished diorite axe – found in 1912.</p>	MLO17760
18	<p>University College London, Gower Street GLHER reference to a Neolithic polished stone axe (unknown date of discovery).</p>	MLO17838
19	<p>151 Great Portland Street, City of Westminster GLHER point location for three separate findspots, all of Roman date. Comprising seven incomplete bone pins, an Iron Brooch and a small fragment of plate (date of discovery unknown).</p>	MLO71751 MLO71752 MLO71753
20	<p>Windmill Street, Camden GLHER findspot of three medieval spurs. Location details are vague; taken from the Museum of London catalogue report form.</p>	MLO71754
21	<p>Tottenham Court Road, Camden Site of former post-medieval burial ground. Holmes says that in 97 years upwards of 30,000 bodies were interred in this ground. In 1896 the ground covered less than 0.5 of an acre, and the Council had opened it as a public garden. The site is in two parts either side of the Congregational Church.</p>	MLO70220 Basil Holmes Map Sheet 26

9 Planning framework

9.1 Statutory protection

Listed Buildings and Conservation Areas

- 9.1.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a conservation area are protected by law. Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.

Human remains

- 9.1.2 Development affecting any former burial ground is regulated by statute, principally the *Burial Act 1857*, the *Disused Burial Grounds Act 1884* and 1981, and the *Pastoral Measure 1983*.
- 9.1.3 The exhumation of any human remains requires approval from either the Secretary of State or the Church of England, depending on the current location of the remains. Exhumations from land which is subject to the Church of England's jurisdiction will need the Church's authorisation (a Faculty or the approval of a proposal under the *Care of Cathedrals Measure 2011*). This includes consecrated ground in cemeteries.
- 9.1.4 Exhumations from land which is not subject to the Church of England's jurisdiction will need a licence from the Secretary of State, under Section 25 of the *Burial Act 1857* as amended by the *Church of England (Miscellaneous Provisions) Measure 2014*. A Licence is required from the Secretary of State if the remains are not intended for reburial in consecrated ground (or if this is to be delayed - for example where archaeological or scientific analysis takes place first).
- 9.1.5 Under the *Town and Country Planning (Churches, Places of Religious Worship and Burial Grounds) Regulations 1930*, the removal and re-interment of human remains should be in accordance with the direction of the local Environmental Health Officer.

9.2 National Planning Policy Framework

- 9.2.1 The Government issued the National Planning Policy Framework (NPPF) in March 2012 (DCLG 2012) and supporting Planning Practice Guidance in 2014 (DCLG 2014). One of the 12 core principles that underpin both plan-making and decision-taking within the framework is to 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations' (DCLG 2012 para 17). It recognises that heritage assets are an irreplaceable resource (para 126), and requires the significance of heritage assets to be considered in the planning process, whether designated or not. The contribution of setting to asset significance needs to be taken into account (para 128). The NPPF encourages early engagement (i.e. pre-application) as this has significant potential to improve the efficiency and effectiveness of a planning application and can lead to better outcomes for the local community (para 188).
- 9.2.2 NPPF Section 12: Conserving and enhancing the historic environment, is produced in full below:

Para 126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

Para 127. 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.

Para 128. 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.

Para 129. 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 assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Para 130. 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.

Para 131. In determining planning applications, local planning authorities should take account of:

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

Para 132: 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Para 133. 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 loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

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

Para 134. 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 securing its optimum viable use.

Para 135. 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 affect directly or indirectly 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.

Para 136. Local planning authorities should not permit 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.

Para 137. 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 or better reveal the significance of the asset should be treated favourably.

Para 138. Not all elements of a World Heritage Site or Conservation Area 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 133 or less than substantial harm under paragraph 134, 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.

Para 139. Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

Para 140. 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.

Para 141. Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also 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.

9.3 Greater London regional policy

The London Plan

9.3.1 The overarching strategies and policies for the whole of the Greater London area are contained within the London Plan of the Greater London Authority (GLA March 2016). Policy 7.8 relates to Heritage Assets and Archaeology:

A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

F. Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

G. Boroughs, in consultation with English Heritage [now named Historic England], Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

- 9.3.2 Para. 7.31A supporting Policy 7.8 notes that ‘Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits.’
- 9.3.3 It further adds (para. 7.31B) ‘Where there is evidence of deliberate neglect of and/or damage to a heritage asset the deteriorated state of that asset should not be taken into account when making a decision on a development proposal’.
- 9.3.4 Para. 7.32 recognises the value of London’s heritage: ‘...where new development uncovers an archaeological site or memorial, these should be preserved and managed on-site. Where this is not possible provision should be made for the investigation, understanding, dissemination and archiving of that asset’.

9.4 Local planning policy

- 9.4.1 Following the Planning and Compulsory Purchase Act 2004, Planning Authorities have replaced their Unitary Development Plans, Local Plans and Supplementary Planning Guidance with a new system of Local Development Frameworks (LDFs). UDP policies are either ‘saved’ or ‘deleted’. In most cases archaeology policies are likely to be ‘saved’ because there have been no significant changes in legislation or advice at a national level.
- 9.4.2 The London Borough of Camden’s Core Strategy and Development Policies were adopted in November 2010. Policy CS14 – Promotion High Quality Places and Conserving our Heritage broadly covers heritage issues, and is supported by Development Policy DP25.

Policy CS14 - Promotion High Quality Places and Conserving our Heritage

The Council will ensure that Camden’s places and buildings are attractive, safe and easy to use by:

- a) requiring development of the highest standard of design that respects local context and character;
- b) preserving and enhancing Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
- c) promoting high quality landscaping and works to streets and public spaces;
- d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
- e) protecting important views of St Paul’s Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.

Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting, including physical preservation, where appropriate.

10 Determining significance

10.1.1 'Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity, and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):

- *Evidential value*: the potential of the physical remains to yield evidence of past human activity. This might take into account date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.
- *Aesthetic value*: this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written;
- *Historical value*: the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative;
- *Communal value*: this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely bound up with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.

10.1.2 Table 3 gives examples of the significance of designated and non-designated heritage assets.

Table 3: Significance of heritage assets

Heritage asset description	Significance
World heritage sites Scheduled monuments Grade I and II* listed buildings Historic England Grade I and II* registered parks and gardens Protected Wrecks Heritage assets of national importance	Very high (International/ national)
Historic England Grade II registered parks and gardens Conservation areas Designated historic battlefields Grade II listed buildings Burial grounds Protected heritage landscapes (e.g. ancient woodland or historic hedgerows) Heritage assets of regional or county importance	High (national/ regional/ county)
Heritage assets with a district value or interest for education or cultural appreciation Locally listed buildings	Medium (District)
Heritage assets with a local (i.e. parish) value or interest for education or cultural appreciation	Low (Local)
Historic environment resource with no significant value or interest	Negligible
Heritage assets that have a clear potential, but for which current knowledge is insufficient to allow significance to be determined	Uncertain

10.1.3 Unless the nature and exact extent of buried archaeological remains within any given area has been determined through prior investigation, significance is often uncertain.

11 Non-archaeological constraints

- 11.1.1 It is anticipated that live services will be present on the site, the locations of which have not been identified by this archaeological report. Other than this, no other non-archaeological constraints to any archaeological fieldwork have been identified within the site.
- 11.1.2 The exhumation of any human remains from land which is not subject to the Church of England's jurisdiction will need a licence from the Secretary of State, under Section 25 of the Burial Act 1857 as amended by the Church of England (Miscellaneous Provisions) Measure 2014.
- 11.1.3 Note: the purpose of this section is to highlight to decision makers any relevant non-archaeological constraints identified during the study, that might affect future archaeological field investigation on the site (should this be recommended). The information has been assembled using only those sources as identified in section 2 and section 13.4, in order to assist forward planning for the project designs, working schemes of investigation and risk assessments that would be needed prior to any such field work. MOLA has used its best endeavours to ensure that the sources used are appropriate for this task but has not independently verified any details. Under the Health & Safety at Work Act 1974 and subsequent regulations, all organisations are required to protect their employees as far as is reasonably practicable by addressing health and safety risks. The contents of this section are intended only to support organisations operating on this site in fulfilling this obligation and do not comprise a comprehensive risk assessment.

12 Glossary

<i>Alluvium</i>	Sediment laid down by a river. Can range from sands and gravels deposited by fast flowing water and clays that settle out of suspension during overbank flooding. Other deposits found on a valley floor are usually included in the term alluvium (e.g. peat).
<i>Archaeological Priority Area/Zone</i>	Areas of archaeological priority, significance, potential or other title, often designated by the local authority.
<i>Brickearth</i>	A fine-grained silt believed to have accumulated by a mixture of processes (e.g. wind, slope and freeze-thaw) mostly since the Last Glacial Maximum around 17,000BP.
<i>B.P.</i>	Before Present, conventionally taken to be 1950
<i>Bronze Age</i>	2,000–600 BC
<i>Building recording</i>	Recording of historic buildings (by a competent archaeological organisation) is undertaken <i>'to document buildings, or parts of buildings, which may be lost as a result of demolition, alteration or neglect'</i> , amongst other reasons. Four levels of recording are defined by Royal Commission on the Historical Monuments of England (RCHME) and Historic England. Level 1 (basic visual record); Level 2 (descriptive record), Level 3 (analytical record), and Level 4 (comprehensive analytical record)
<i>Built heritage</i>	Upstanding structure of historic interest.
<i>Colluvium</i>	A natural deposit accumulated through the action of rainwash or gravity at the base of a slope.
<i>Conservation area</i>	An area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. Designation by the local authority often includes controls over the demolition of buildings; strengthened controls over minor development; and special provision for the protection of trees.
<i>Cropmarks</i>	Marks visible from the air in growing crops, caused by moisture variation due to subsurface features of possible archaeological origin (i.e. ditches or buried walls).
<i>Cut-and-cover [trench]</i>	Method of construction in which a trench is excavated down from existing ground level and which is subsequently covered over and/or backfilled.
<i>Cut feature</i>	Archaeological feature such as a pit, ditch or well, which has been cut into the then-existing ground surface.
<i>Devensian</i>	The most recent cold stage (glacial) of the Pleistocene. Spanning the period from c 70,000 years ago until the start of the Holocene (10,000 years ago). Climate fluctuated within the Devensian, as it did in other glacials and interglacials. It is associated with the demise of the Neanderthals and the expansion of modern humans.
<i>Early medieval</i>	AD 410–1066. Also referred to as the Saxon period.
<i>Evaluation (archaeological)</i>	A limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area.
<i>Excavation (archaeological)</i>	A programme of controlled, intrusive fieldwork with defined research objectives which examines, records and interprets archaeological remains, retrieves artefacts, ecofacts and other remains within a specified area. The records made and objects gathered are studied and the results published in detail appropriate to the project design.
<i>Findspot</i>	Chance find/antiquarian discovery of artefact. The artefact has no known context, is either residual or indicates an area of archaeological activity.
<i>Geotechnical</i>	Ground investigation, typically in the form of boreholes and/or trial/test pits, carried out for engineering purposes to determine the nature of the subsurface deposits.
<i>Head</i>	Weathered/soliflucted periglacial deposit (i.e. moved downslope through natural processes).
<i>Heritage asset</i>	A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets and assets identified by the local planning authority (including local listing).
<i>Historic environment assessment</i>	A written document whose purpose is to determine, as far as is reasonably possible from existing records, the nature of the historic environment resource/heritage assets within a specified area.
<i>Historic Environment Record (HER)</i>	Archaeological and built heritage database held and maintained by the County authority. Previously known as the Sites and Monuments Record
<i>Holocene</i>	The most recent epoch (part) of the Quaternary, covering the past 10,000 years during which time a warm interglacial climate has existed. Also referred to as the 'Postglacial' and (in Britain) as the 'Flandrian'.
<i>Iron Age</i>	600 BC–AD 43

<i>Later medieval</i>	AD 1066 – 1500
<i>Last Glacial Maximum</i>	Characterised by the expansion of the last ice sheet to affect the British Isles (around 18,000 years ago), which at its maximum extent covered over two-thirds of the present land area of the country.
<i>Locally listed building</i>	A structure of local architectural and/or historical interest. These are structures that are not included in the Secretary of State's Listing but are considered by the local authority to have architectural and/or historical merit
<i>Listed building</i>	A structure of architectural and/or historical interest. These are included on the Secretary of State's list, which affords statutory protection. These are subdivided into Grades I, II* and II (in descending importance).
<i>Made Ground</i>	Artificial deposit. An archaeologist would differentiate between modern made ground, containing identifiably modern inclusion such as concrete (but not brick or tile), and undated made ground, which may potentially contain deposits of archaeological interest.
<i>Mesolithic</i>	12,000 – 4,000 BC
<i>National Record for the Historic Environment (NRHE)</i>	National database of archaeological sites, finds and events as maintained by Historic England in Swindon. Generally not as comprehensive as the country HER.
<i>Neolithic</i>	4,000 – 2,000 BC
<i>Ordnance Datum (OD)</i>	A vertical datum used by Ordnance Survey as the basis for deriving altitudes on maps.
<i>Palaeo-environmental</i>	Related to past environments, i.e. during the prehistoric and later periods. Such remains can be of archaeological interest, and often consist of organic remains such as pollen and plant macro fossils which can be used to reconstruct the past environment.
<i>Palaeolithic</i>	700,000–12,000 BC
<i>Palaeochannel</i>	A former/ancient watercourse
<i>Peat</i>	A build-up of organic material in waterlogged areas, producing marshes, fens, mires, blanket and raised bogs. Accumulation is due to inhibited decay in anaerobic conditions.
<i>Pleistocene</i>	Geological period pre-dating the Holocene.
<i>Post-medieval</i>	AD 1500–present
<i>Preservation by record</i>	Archaeological mitigation strategy where archaeological remains are fully excavated and recorded archaeologically and the results published. For remains of lesser significance, preservation by record might comprise an archaeological watching brief.
<i>Preservation in situ</i>	Archaeological mitigation strategy where nationally important (whether Scheduled or not) archaeological remains are preserved <i>in situ</i> for future generations, typically through modifications to design proposals to avoid damage or destruction of such remains.
<i>Registered Historic Parks and Gardens</i>	A site may lie within or contain a registered historic park or garden. The register of these in England is compiled and maintained by Historic England.
<i>Residual</i>	When used to describe archaeological artefacts, this means not <i>in situ</i> , i.e. Found outside the context in which it was originally deposited.
<i>Roman</i>	AD 43–410
<i>Scheduled Monument</i>	An ancient monument or archaeological deposits designated by the Secretary of State as a 'Scheduled Ancient Monument' and protected under the Ancient Monuments Act.
<i>Site</i>	The area of proposed development
<i>Site codes</i>	Unique identifying codes allocated to archaeological fieldwork sites, e.g. evaluation, excavation, or watching brief sites.
<i>Study area</i>	Defined area surrounding the proposed development in which archaeological data is collected and analysed in order to set the site into its archaeological and historical context.
<i>Solifluction, Soliflucted</i>	Creeping of soil down a slope during periods of freeze and thaw in periglacial environments. Such material can seal and protect earlier landsurfaces and archaeological deposits which might otherwise not survive later erosion.
<i>Stratigraphy</i>	A term used to define a sequence of visually distinct horizontal layers (strata), one above another, which form the material remains of past cultures.
<i>Truncate</i>	Partially or wholly remove. In archaeological terms remains may have been truncated by previous construction activity.
<i>Watching brief (archaeological)</i>	An archaeological watching brief is 'a formal programme of observation and investigation conducted during any operation carried out for non–archaeological reasons.'

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 - Existing basement plan, LD15 078.00, drwg no P-XTG-LB1 dated 20-1-2017
 - Existing south-facing section, LD15 078.00, drwg no S-XTG-AA-BB dated 20-01-2017
 - Proposed ground floor plan, LD15 078.00, drwg no P_GA_00 dated 20-01-2017
 - Proposed basement floor plan, LD15 078.00, drwg no P_GA_B1 dated 20-01-2017
 - Proposed south facing section, LD15 078.00, drwg no S_01_AA-BB dated 20-01-2017

13.4 Available site survey information checklist

Information from client	Available	Format	Obtained
Plan of existing site services (overhead/buried)	N	-	-
Levelled site survey as existing (ground and buildings)	Y	pdf	Y
Contamination survey data ground and buildings (inc. asbestos)	Y	pdf	Y
Geotechnical report	Y	pdf	Y
Envirocheck report	Not known	-	N
Information obtained from non-client source	Carried out	Internal inspection of buildings	
Site inspection	N	N	



Fig 1 Site location

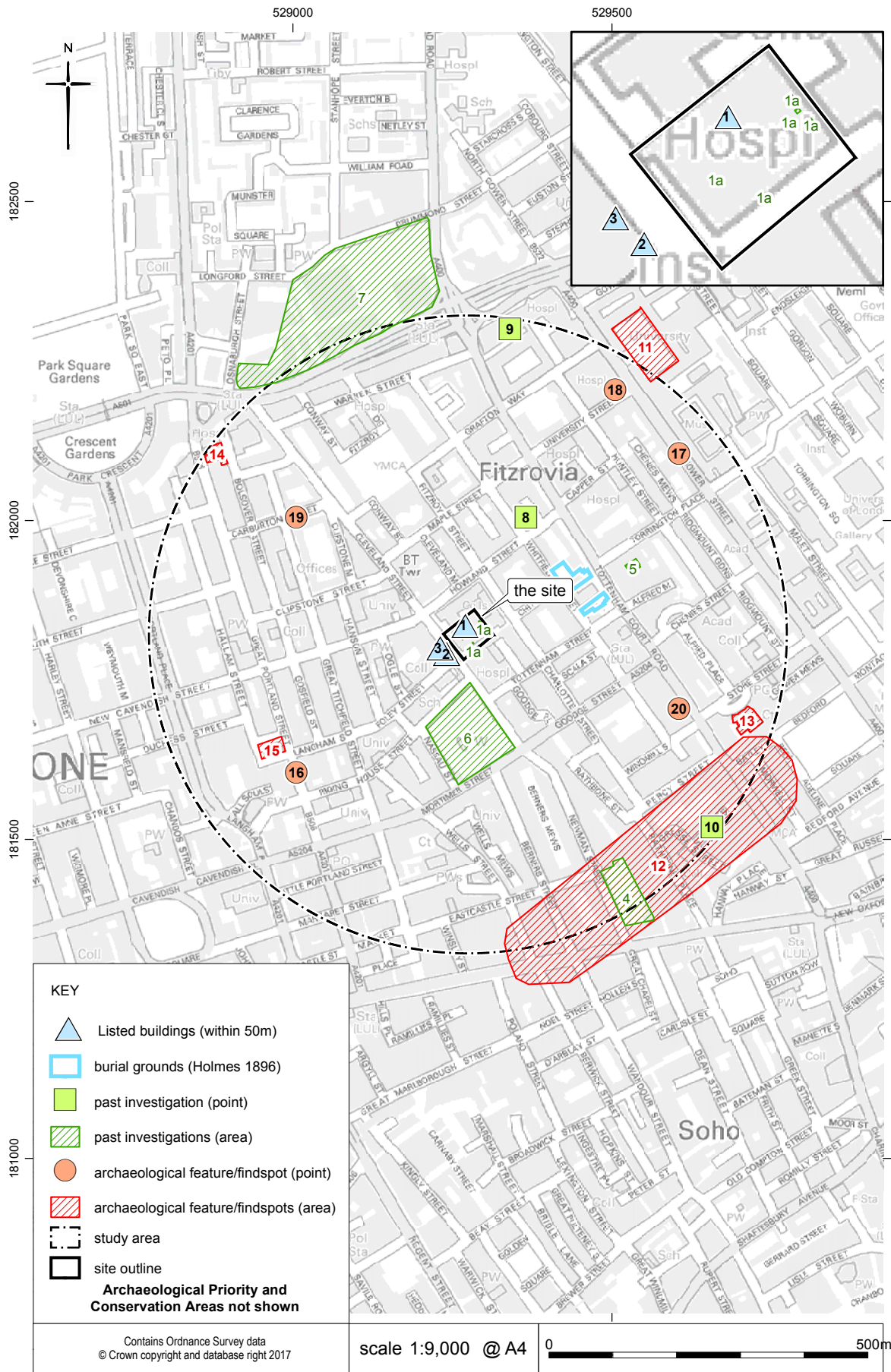
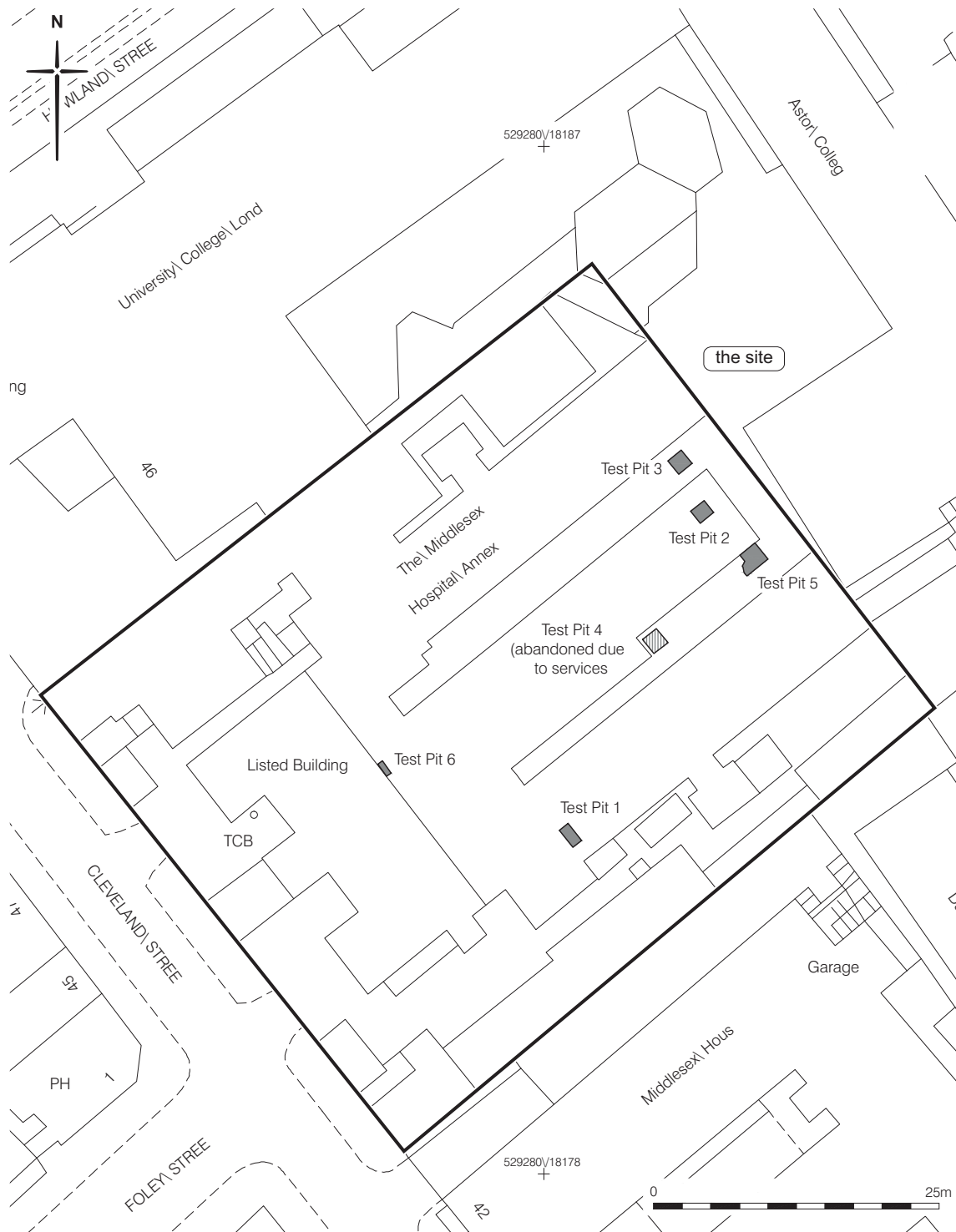


Fig 2 Historic environment features map



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Pre-Construct Archaeology Ltd 2
9/06/14

Figure
Test Pit Location
1:500 at

Fig 2a Location of test pits dug in 2014 within the site (PCA 2014, figure 2)

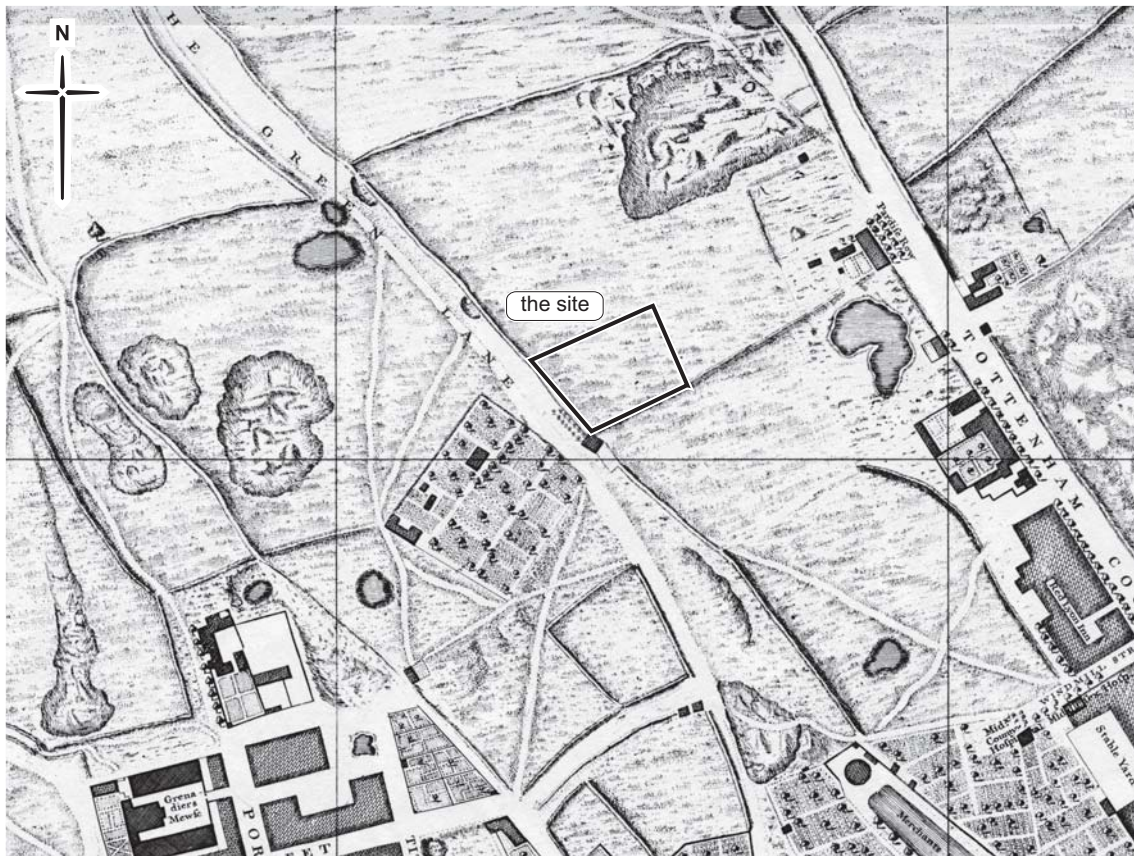


Fig 3 Rocque's 1746 map



Fig 4 Horwood's 1799 map



Fig 5 Tompson's map of the parish of St Pancras, 1801 (Camden Local Studies Archive)

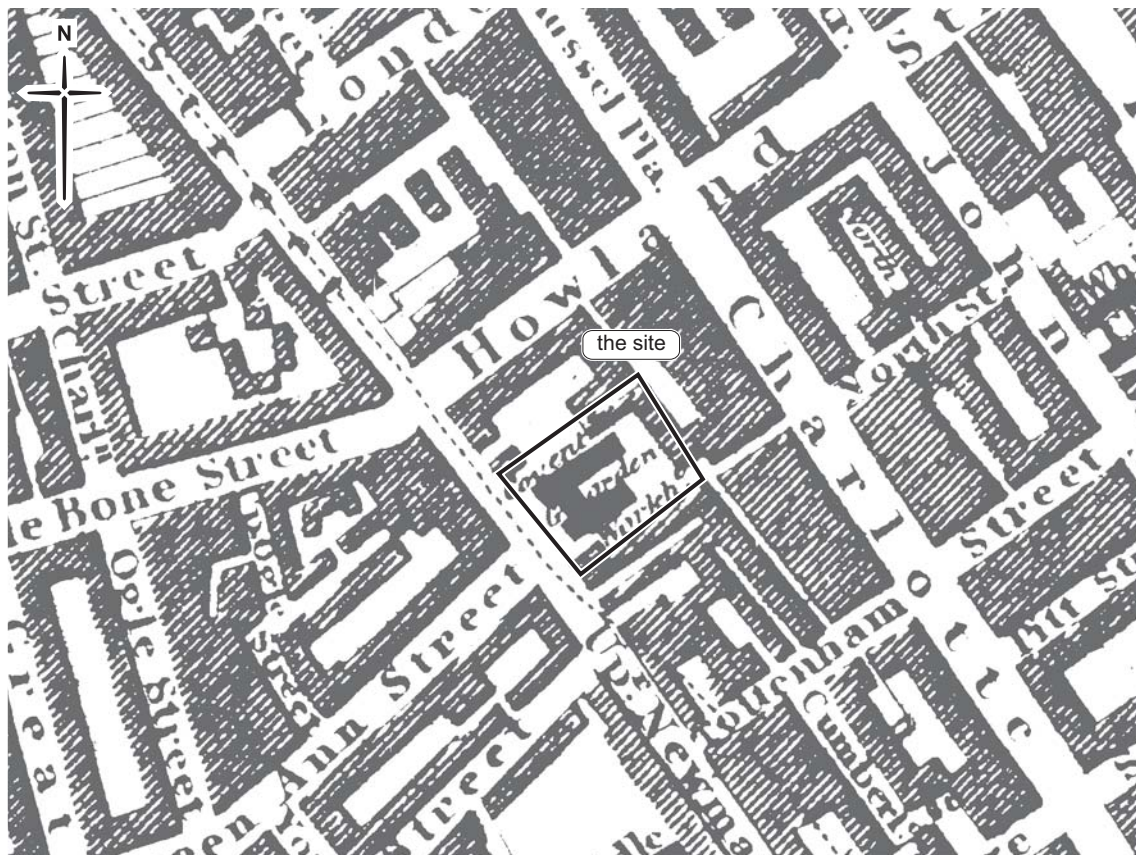


Fig 6 Greenwood's map of 1824-26

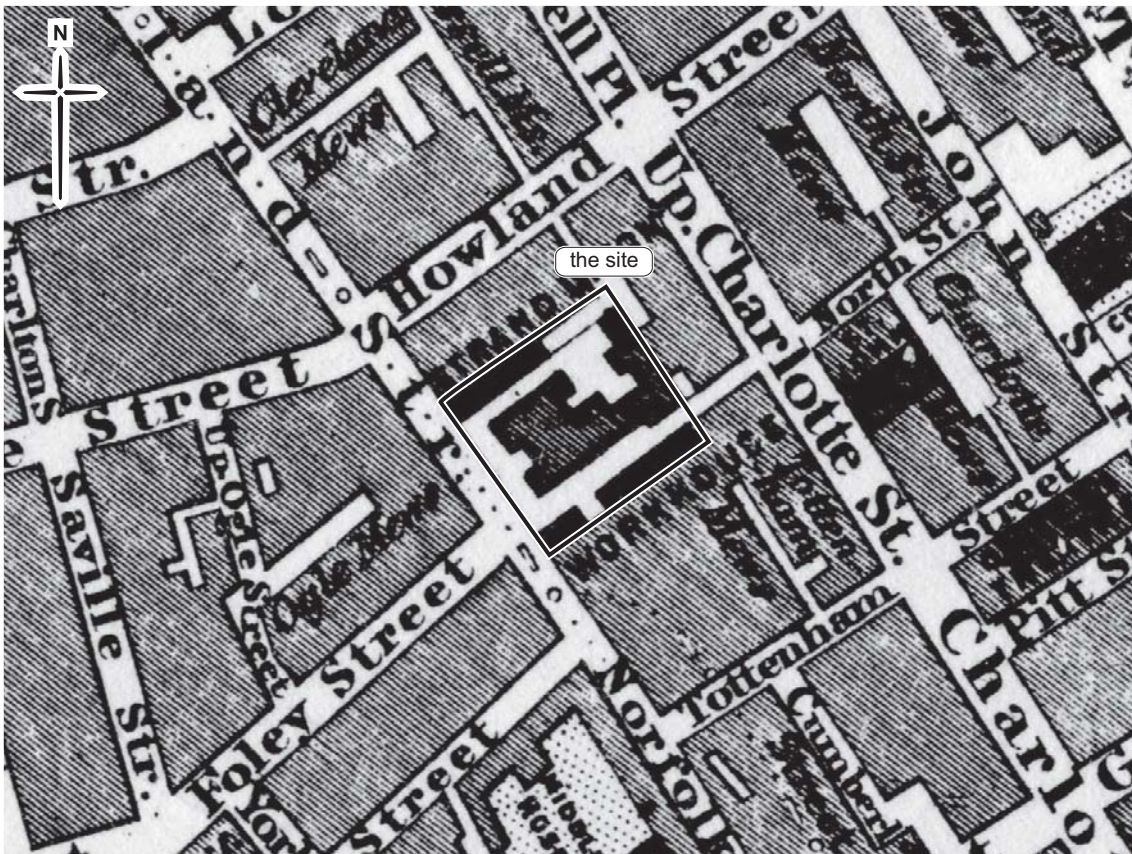


Fig 7 Stanford's 1862 map

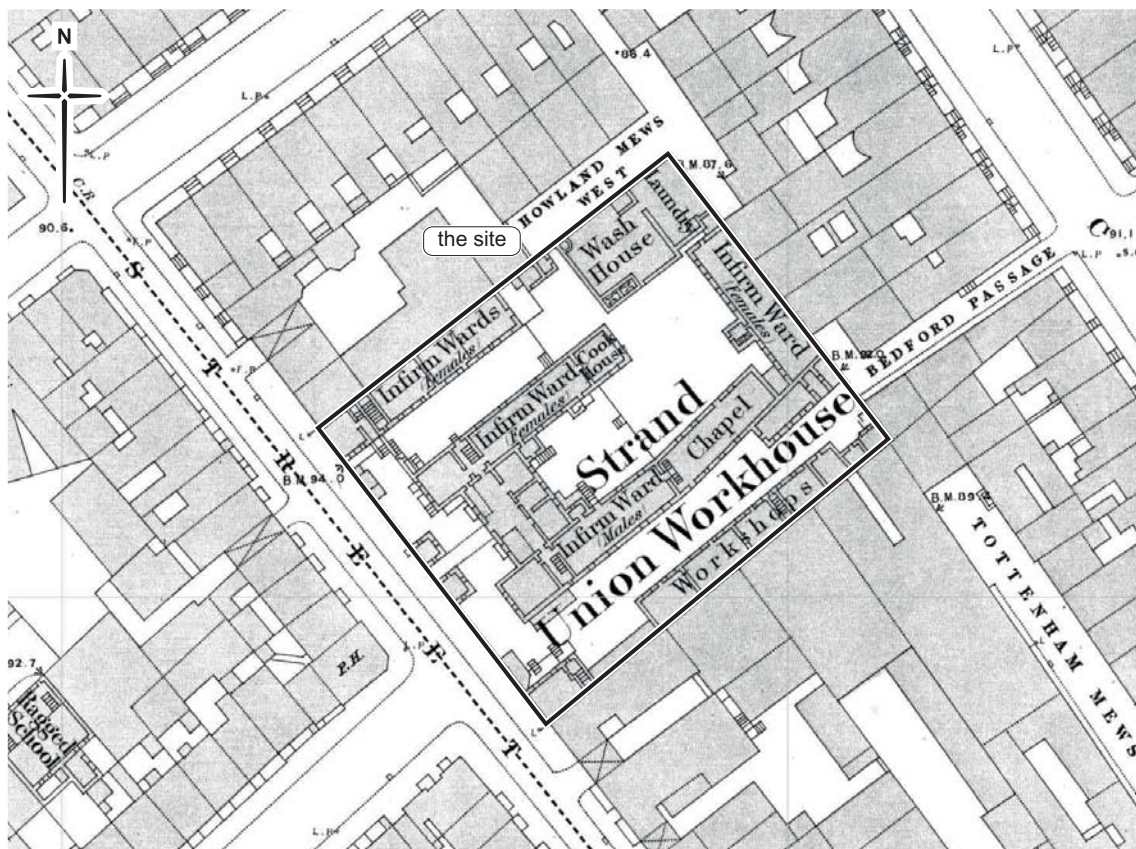


Fig 8 Ordnance Survey 1st edition 5ft: mile map of 1872 (not to scale)

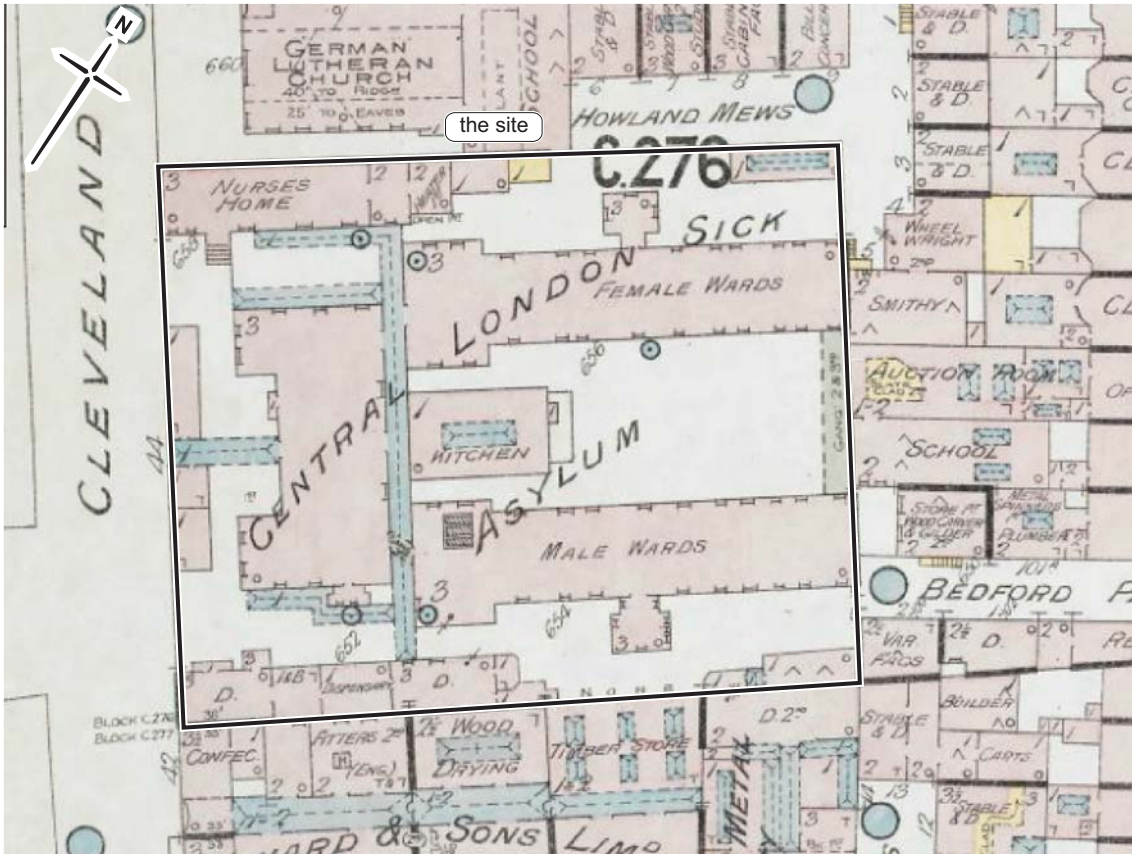


Fig 9 Goad Fire Insurance Plan of 1901 (© British Library Board, Shelfmark: Maps 145.b.23.(c), Vol C, Sheet 32)

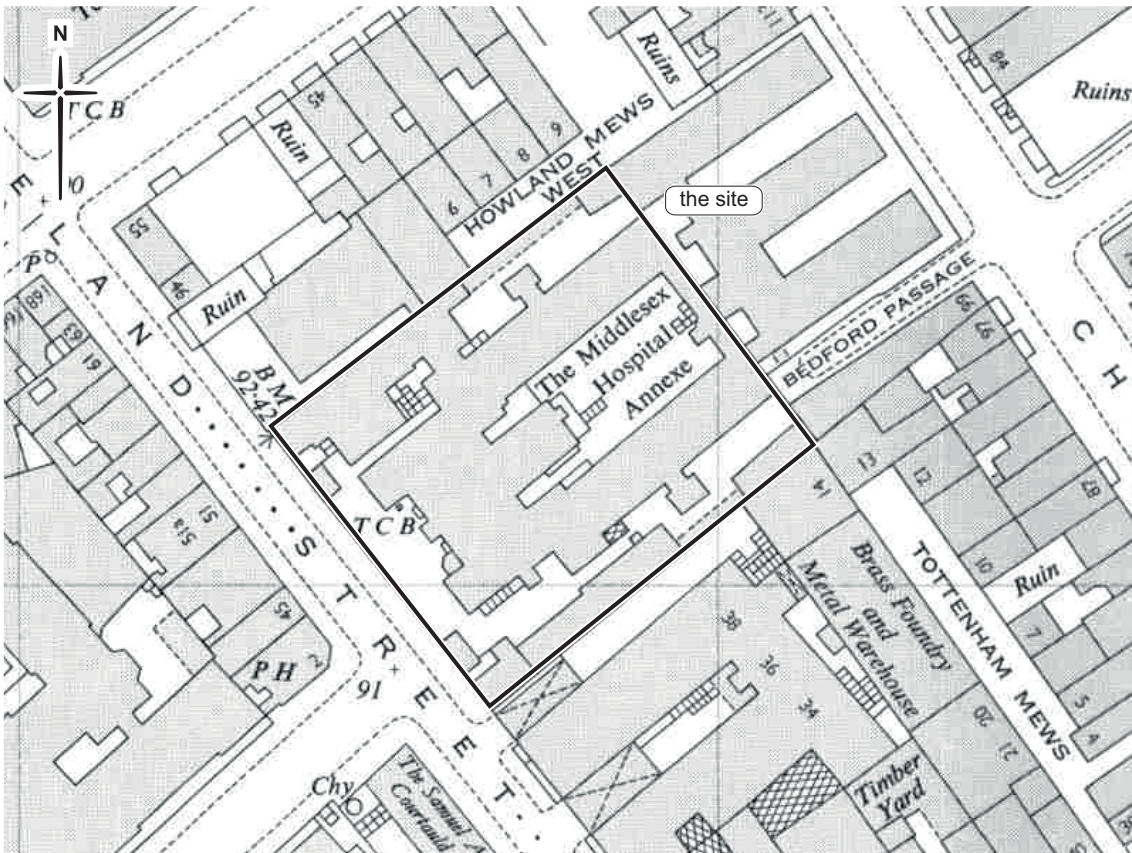


Fig 10 Ordnance Survey 1:1250 scale map of 1951 (not to scale)



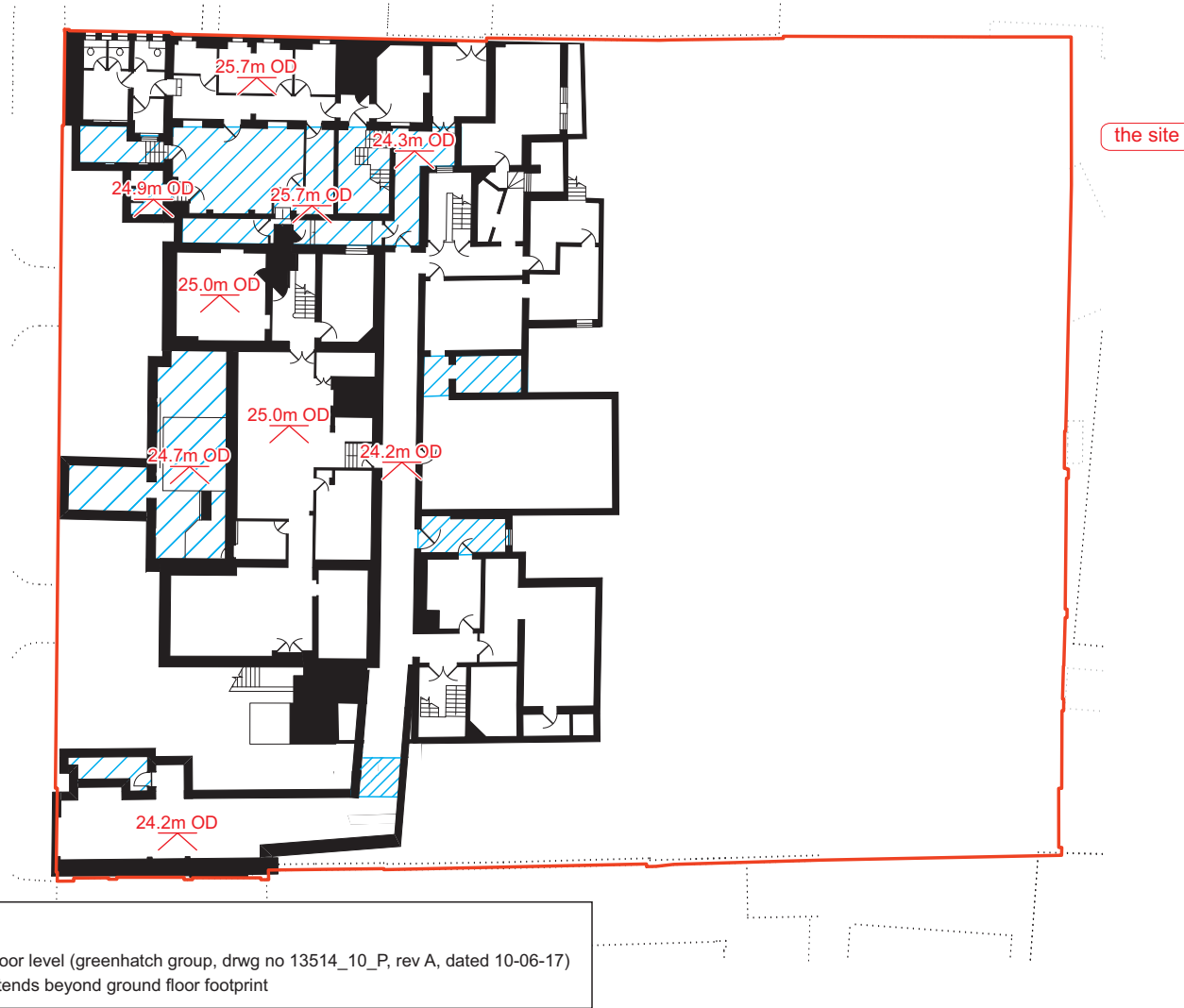
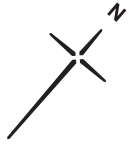
Fig 11 Main front of the late 18th-century building (left) and the gable end of the late 19th-century south range (right), on Cleveland Street, looking north-east (MoLAS 2008)



Fig 12 Rear of the late 18th-century building (centre), with two late 19th-century wings extending from its south and north ends, looking south-west (MoLAS 2008)



Fig 13 Existing ground floor plan, showing extent of current buildings on the site (Llewelyn Davies, LD15 078.00, drwg no P-XTG-L00 dated 20-1-2017), with known ground levels taken from Topographical Survey (Greenhatch group, drwg no 13514_09_P, rev C, 10-06-2017)



CAMD1277HEA17#14

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Fig 14 Existing basement floor plan (Llewelyn Davies, LD15 078.00, drwg no P-XTG-LB1 dated 20-1-2017), with FFL levels taken from Topographical Survey (Greenhatch group, drwg no 13514_10_P, rev A, 10-06-2017)

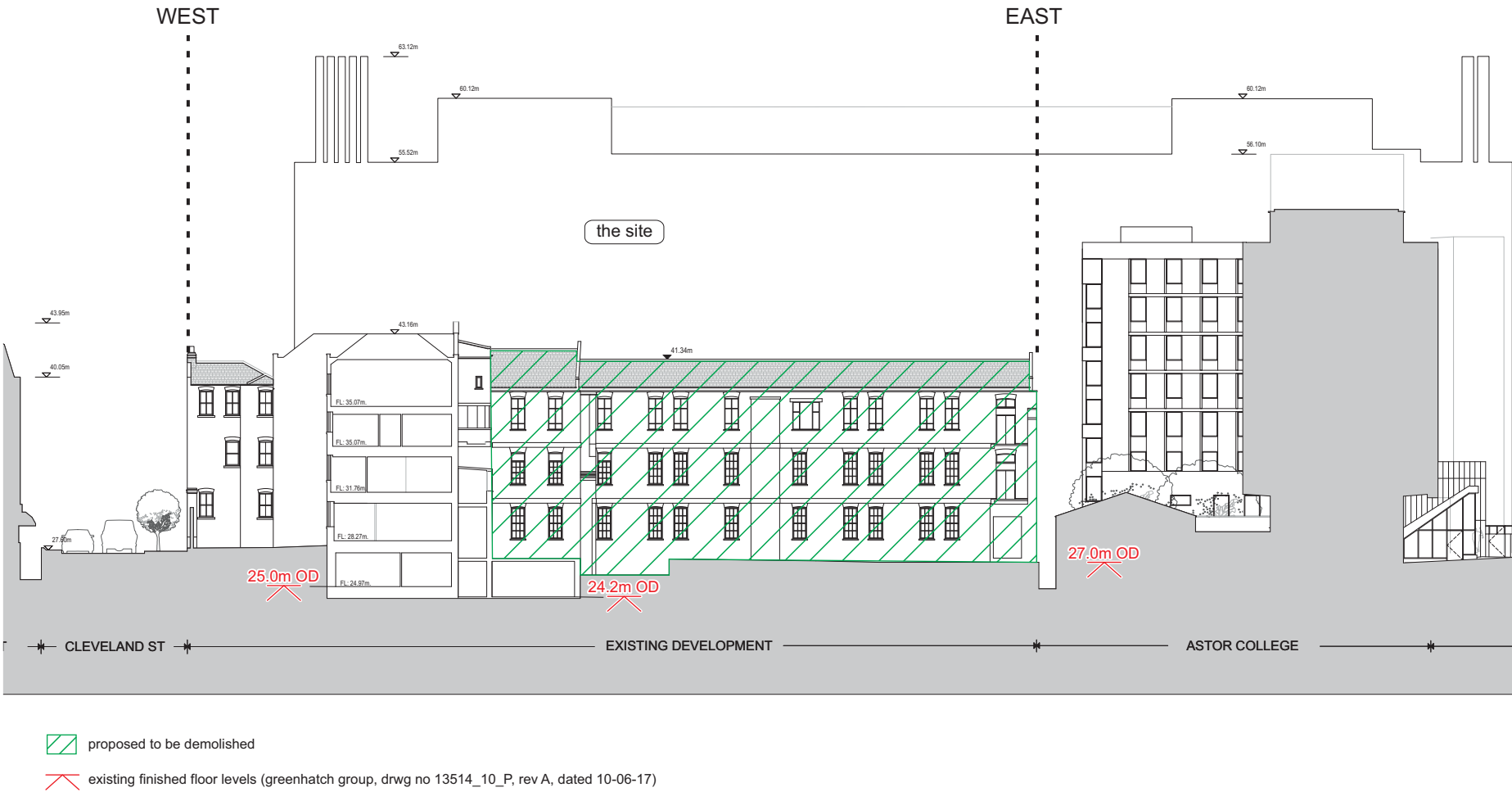


Fig 15 Existing south-facing section through proposal site (Llewelyn Davies, LD15 078.00, drwg no S-XTG-AA-BB dated 20-01-2017).

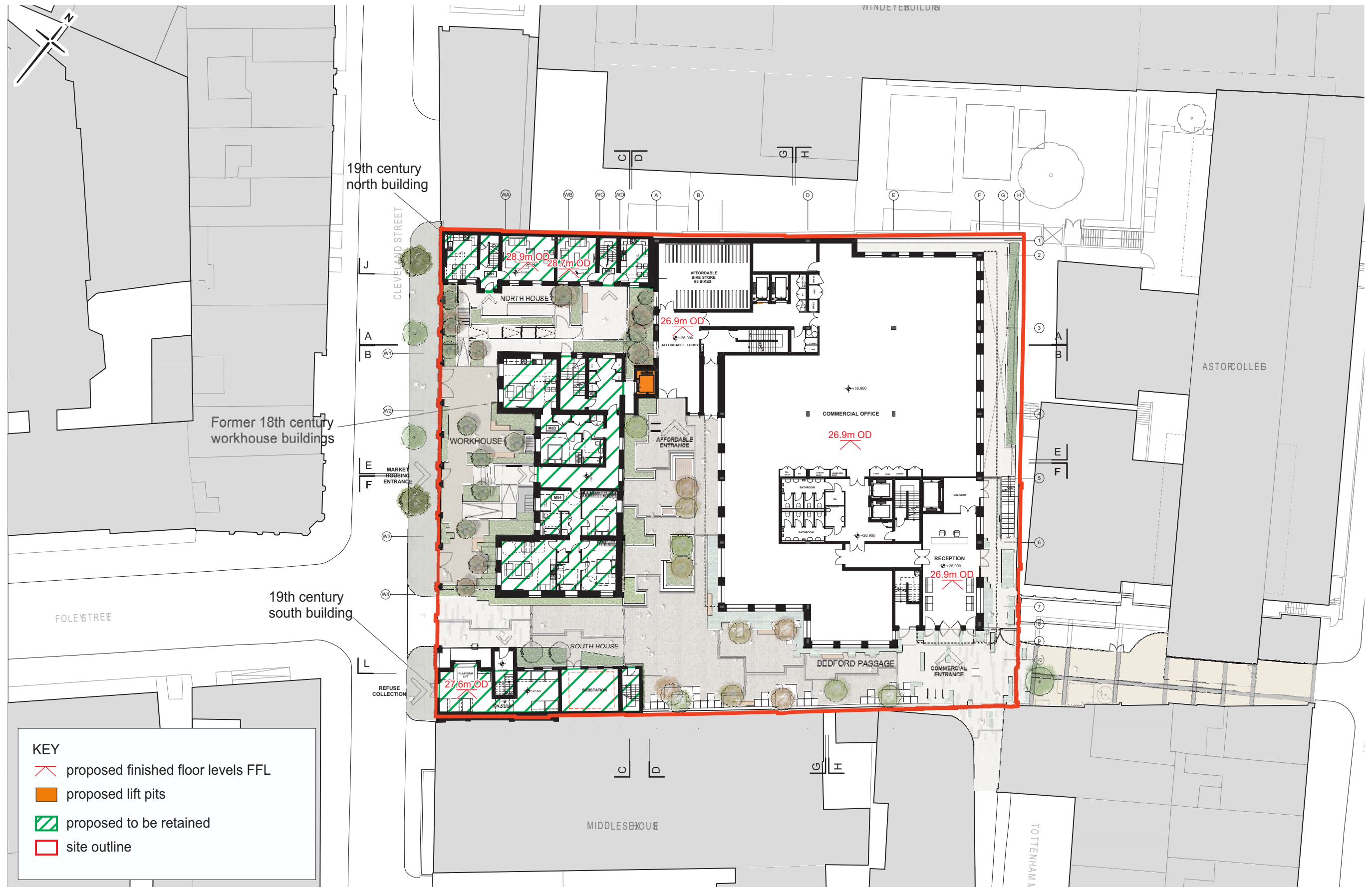
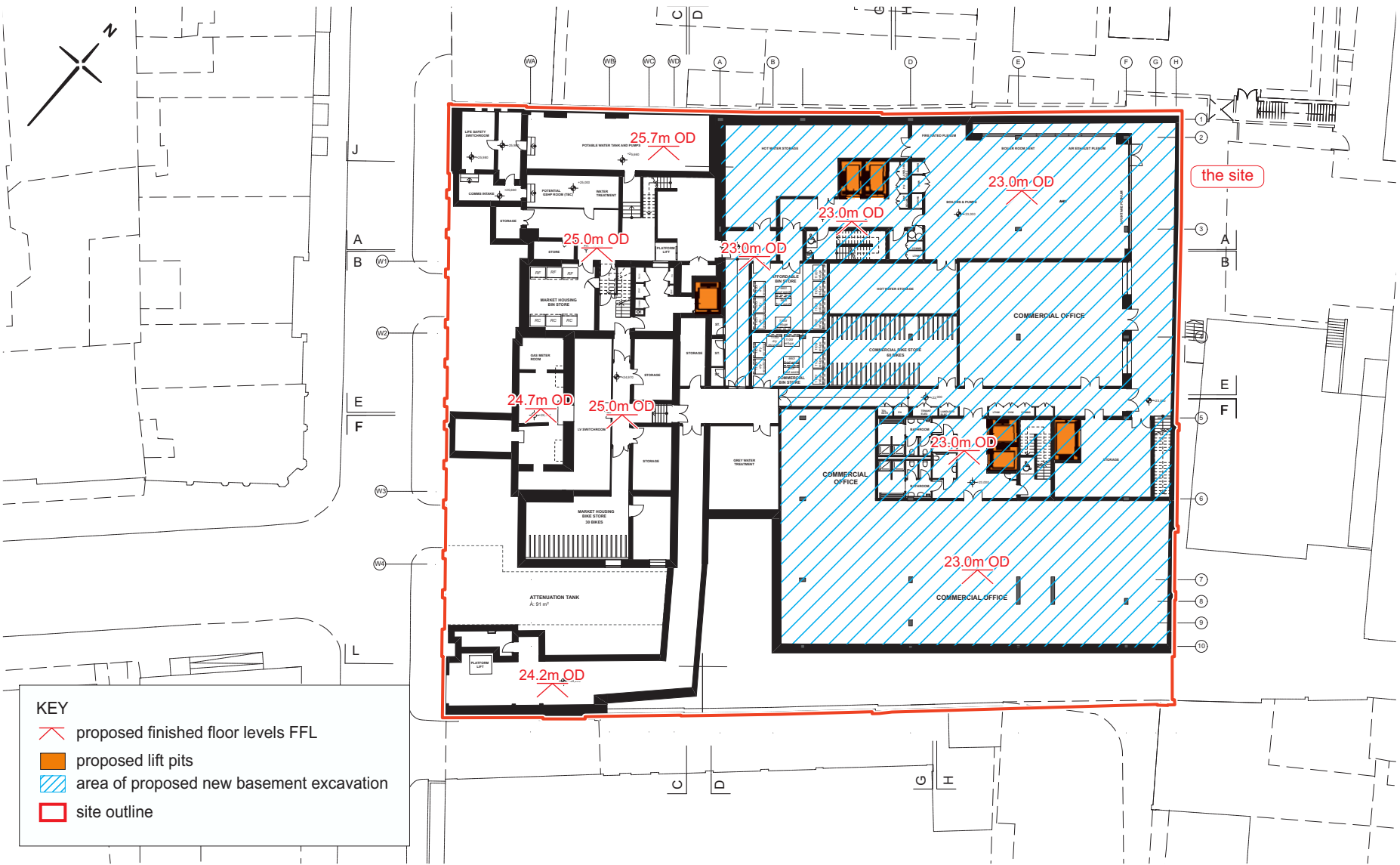


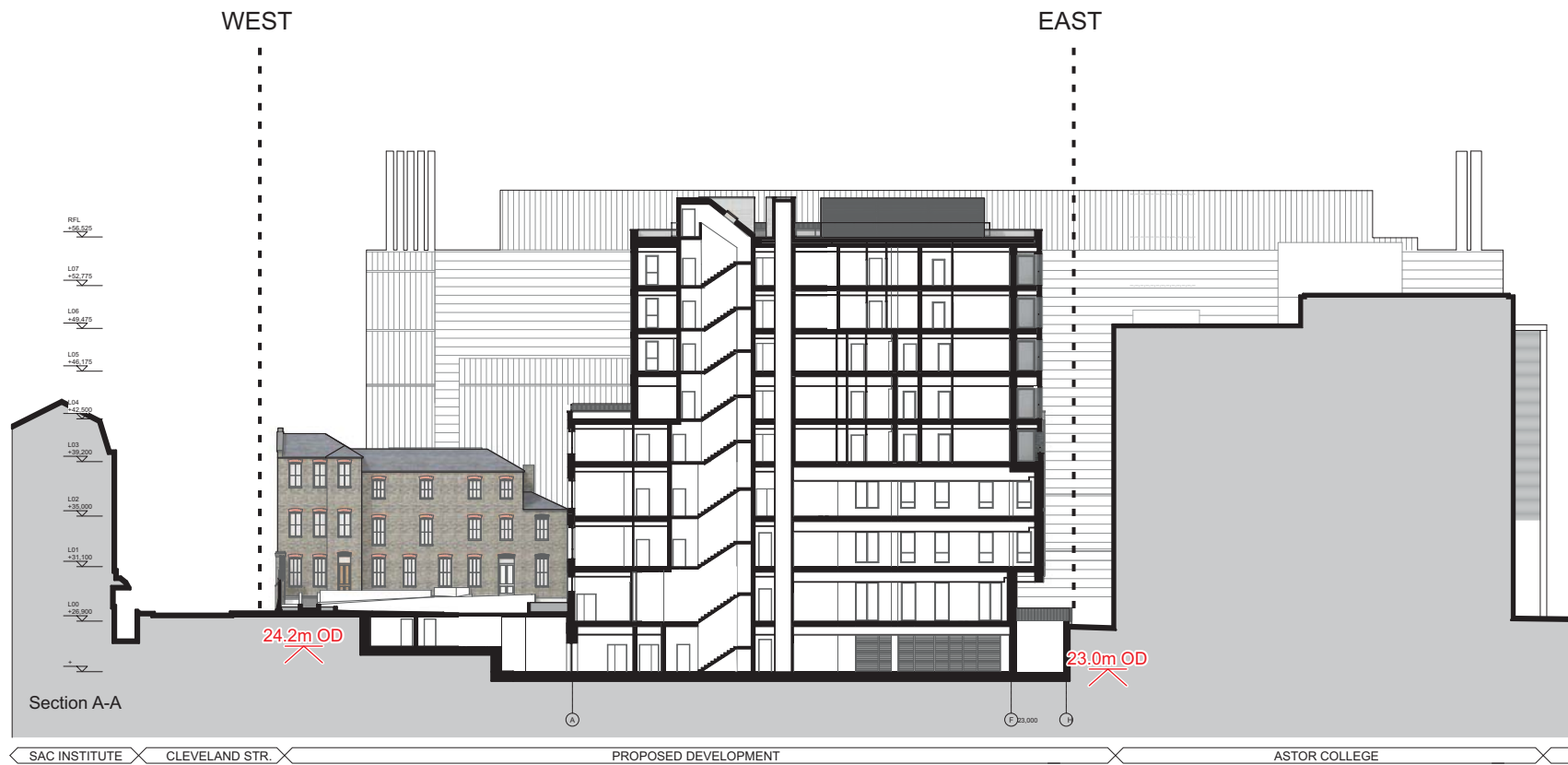
Fig 16 Proposed ground floor plan (Llewelyn Davies, LD15 078.00, drwg no P_GA_00 dated 20-01-2017)

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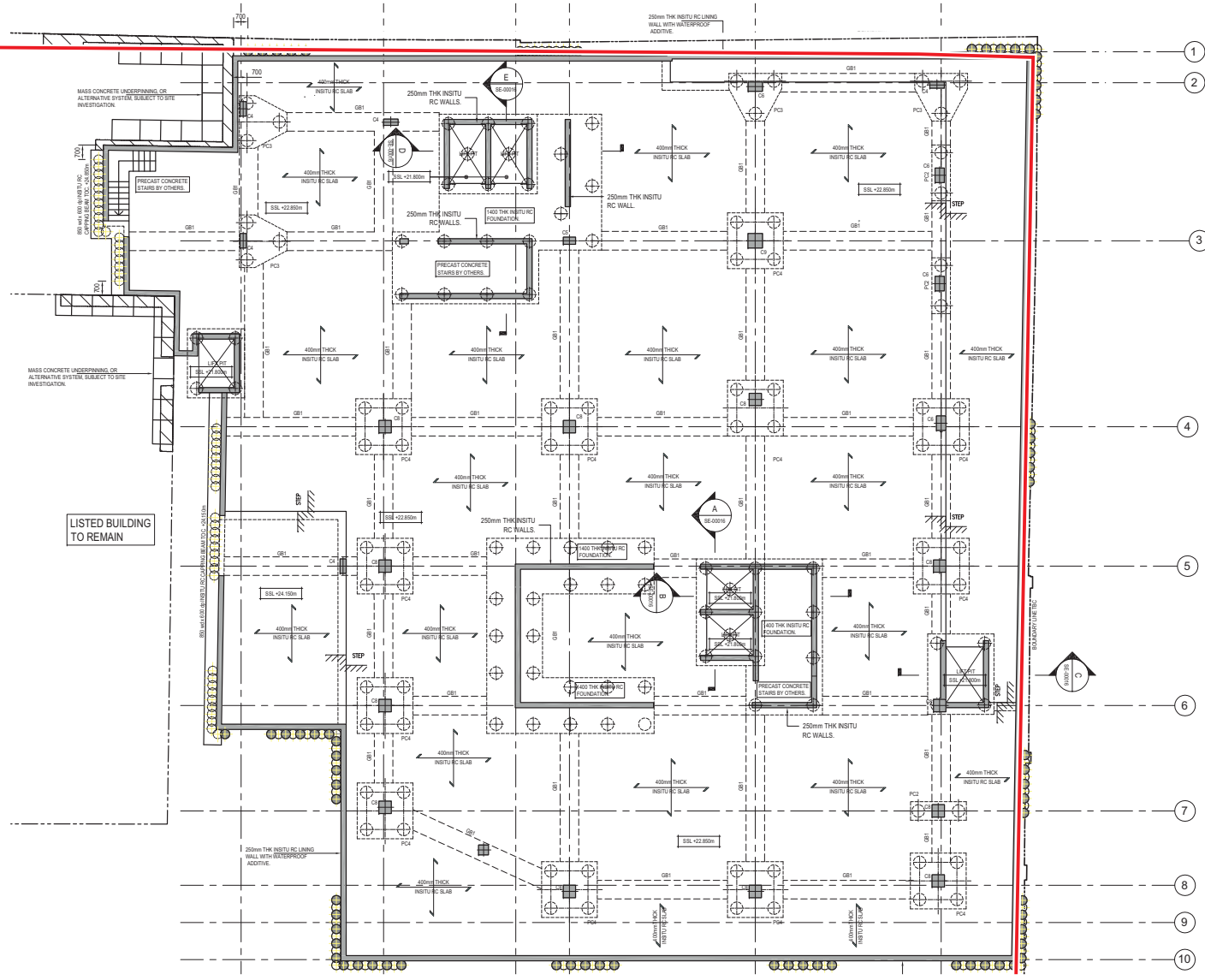
Fig 17 Proposed basement floor plan (Llewelyn Davies, LD15 078.00, drwg no P_GA_B1 dated 20-01-2017)



 proposed finished floor levels FFL (Llewelyn Davies, LD15 078.00, drwg no P_GA_B1 dated 20-01-2017)

Fig 18 Proposed south-facing section (Llewelyn Davies, LD15 078.00, drwg no S_01_AA-BB dated 20-01-2017).

Project Management In-charge: Designer: Checked: Approved: 16/12/17
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CS	250mm THK INSITU RC WALL
CB	400mm THICK INSITU RC SLAB
CA	1400 THK INSITU RC FOUNDATION
CC	250mm THK INSITU RC WALL

Fig 19 Proposed arrangement at basement level, showing location of piles and secant perimeter wall (Aecom, 60516144, drwg no. MHA-ACM-NB-B1-DR-S-0002, rev A, dated 16-12-17)