



Historic England

Ms Elaine Quigley  
London Borough of Camden  
Town Hall,  
Camden Town Hall Extension,  
Argyle Street,  
Camden,  
London,  
WC1H 8ND

Your Ref: 2016/2094/P  
Our Ref: CLO24563  
Contact: Laura O'Gorman  
Direct Dial: 020 7973 3242  
Email: [laura.o'gorman@HistoricEngland.org.uk](mailto:laura.o'gorman@HistoricEngland.org.uk)

Dear Ms Quigley

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

**150 Holborn London EC1N 2NS**

*Demolition of existing buildings and redevelopment for mixed use development up to nine storeys in height comprising 12,862 sqm GIA office floorspace (Use Class B1), 1,480 sqm GIA retail floorspace (Use Class A1-A3), 13 residential units (Use Class C3), improvements to the public realm and all other necessary enabling works (REVISED DESCRIPTION)*

**Recommend Pre-Determination Archaeological Assessment/Evaluation**

Thank you for your consultation received on 05 October 2017.

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

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



Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
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Appraisal of this planning application using the Greater London Historic Environment Record and information submitted with the application indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: London Suburbs..

The site lies within an area of archaeological interest. The Greater London Historic Environment Record shows that the site has the potential for archaeological remains dating to the Roman, medieval and post-medieval periods. Holborn closely follows the line of a major Roman road that ran west from the City of London (Londinium) and evidence of Roman activity including Roman burials have been recorded within the vicinity of the site. During the medieval period the settlement of London spread into the surrounding areas and with it came the development of the Inns of Court. On the south side of Holborn, is a Tier 1 Archaeological Priority Area. This was recently designated during a review of the City of Westminster's Archaeological Priority Areas, and through planning should be treated as equivalent to a scheduled monument. Camden's Archaeological Priority Areas are due for review and it is possible that the significance archaeological priority area in which the site is located will reflect that to the south.

It is noted from the submitted document that the existing building includes a basement level. This is likely to have had some impact on archaeological survival, although the scale of which is unclear. It is therefore important, given the potential significance of the archaeological remains that could be encountered, that an archaeological desk-based assessment be submitted with the application. This should aim to assess the archaeological survival potential and where available should include a review of any geotechnical investigation or Historic British Geological Survey boreholes.

I therefore recommend that the following further studies should be undertaken to inform the preparation of proposals and accompany a planning application:

### **Desk Based Assessment**

Desk-based assessment produces a report to inform planning decisions. It uses existing information to identify the likely effects of the development on the significance of heritage assets, including considering the potential for new discoveries and effects on the setting of nearby assets. An assessment may lead on to further evaluation and/or mitigation measures.

Depending on the results of the desk based assessment the following may also be required...



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## Evaluation

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

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

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

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

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

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

Yours sincerely

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Laura O'Gorman

Archaeology Advisor

Greater London Archaeological Advisory Service

Planning Group: London



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