



Historic England

Mr David Fowler  
London Borough of Camden  
Town Hall,  
Camden Town Hall Extension,  
Argyle Street,  
Camden,  
London,  
WC1H 8ND

Your Ref: 2018/4924/P  
Our Ref: CLO27592  
Contact: Laura O’Gorman  
Direct Dial: 0207 973 3242  
Email: laura.o’gorman@  
HistoricEngland.org.uk

06 November 2018

Dear Mr Fowler,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2018**

**18 - 22 Hand Court, London, WC1V 6JF**

*Demolition of 18 - 21 Hand Court and the erection of a new building comprising, basement, ground plus 4 upper storeys of office (Class B1) and retail (Class A1/A3) uses; the refurbishment and change of use of basement and ground floor level at 22 - 23 Hand Court from office (Class B1) to retail (Class A1/A3); and associated works.*

**Recommend Archaeological Condition(s)**

Thank you for your consultation received on 17 October 2018.

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

NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

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



Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3000  
[www.historicengland.org.uk](http://www.historicengland.org.uk)

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If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The submitted Archaeological Impact Assessment (MOLA, September 2018) has identified a moderate potential for Roman and later medieval remains and a high potential for post-medieval remains. There is some potential for burials associated with the Roman western cemetery however the existing evidence lies to the east/south-east with no evidence in the immediate vicinity of the site. I therefore agree that the potential for such remains is likely to be low. Otherwise the main potential is for remains of the medieval and post-medieval development of the London suburbs. It is not anticipated that the significance of the archaeology would be high (requiring preservation in situ); however an evaluation is necessary to fully clarify the nature of the nature and significance of the archaeology, thus enabling an appropriate mitigation strategy to be formulated.

Although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching condition as follows:

- Condition      No demolition (other than down to the top of the existing ground floor slab) or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no further demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.
- If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no further demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:
- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
  - B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.
- Informative      Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town



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I envisage that the archaeological fieldwork would comprise the following:

### **Evaluation**

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

The evaluation should aim to fully assess the archaeological sequence in order to inform the mitigation strategy. The submitted assessment indicates that up to 3m of deposits could present, therefore the initial evaluation should include provisions for shoring in order to meet the evaluation's aim and objectives. Given the potential space constraints I am happy for the evaluation to take place following demolition, however, demolition should only be down to the top of the existing ground floor slab.

You can find more information on archaeology and planning in Greater London on our website.

This response only relates to archaeology. You should also consult Historic England's Development Management on statutory matters.

Yours sincerely

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



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