



# 156–164 GRAY'S INN ROAD AND PANTHER HOUSE London WC1

London Borough of Camden

Historic environment assessment

August 2019





# 156–164 Gray's Inn Road and Panther House London WC1

# Historic environment assessment

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Note: site outlines may appear differently on some figures owing to distortions in historic maps. North is approximate on early maps.

# **Executive summary**

Radcliffes on behalf of Panther House Developments Limited has commissioned MOLA to carry out a historic environment assessment in advance of proposed development at 156–164 Gray's Inn Road and Panther House in the London Borough of Camden. The scheme comprises the redevelopment of the site to include retention, refurbishment and part 2, part 3 storey roof extensions of Panther House; retention and refurbishment of the Tramshed at Brain Yard; demolition of 156 and 160-164 Grays Inn Road and replacement with a 7 storey building to deliver 6,642sq.m (GIA) of employment (B1) uses across Panther House, the Tramshed and two levels of Grays Inn Road, 229sq.m of A1/A3 uses at the ground floor level of Grays Inn Road and 7 residential units (C3) equating to 949sq.m of GIA at the upper floors of the Grays Inn Road building. The existing basements across the site would be retained, no deepening or extension to the basements are planned. Details of any addition foundations required for the new and additional buildings is not known at present and for the purposes of this assessment it is assumed that foundations would be piled.

This desk-based study assesses the impact of the scheme on buried heritage assets (archaeological remains). Above ground heritage assets (historic structures) are not discussed in detail, but 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 remains**. Historic mapping shows that the site was first developed in the late 17th century. There is high potential for remains of buried footings of 18th century almshouses fronting Gray's Inn Road in the western part of the site and an early (mid-18th century) workhouse with later (mid-19th century) additions in the central and eastern parts of the site. Any such remains are likely to be of low heritage significance.
- Roman remains. The site lies close to the possible course of a Roman road, and has low to moderate potential for evidence of roadside activity. This could include agricultural ditches and, although considered unlikely, burials. Any residual finds would be of low significance, ditches would be of medium significance and burials of high significance.

The site has low potential for remains of other periods. No prehistoric remains have been found in the vicinity.

Archaeological survival potential is likely to vary across the site. It will be low in the area of Panther House, and moderate beneath the Brain Yard warehouse due to the existing basements. Outside basemented area, in the western third of the site, survival potential will be high.

The construction of piled foundations and services would entirely remove or severely truncate any archaeological remains within the footprint of each foundation, trench or excavation. Demolition is likely to only affect modern made ground but in areas where undated made ground is closer to the modern ground surface, could impact upon made ground likely to be of 18th to 19th century date.

Although no likely assets of high or very high significance have been identified within the site, the site is within a Tier 2 Archaeological Priority Area. Therefore, it is likely that the Borough would require further investigation to determine the nature, extent and significance of any remains. Such an investigation could take the form of targeted evaluation test pits.

The results would determine the most appropriate mitigation strategy if required, which could take the form of an excavation in the case of significant remains and/or a watching brief during ground preparation in the case of less substantive remains and of lesser significance to ensure that any previously unrecorded archaeological assets present are not removed without record. Such work could take place under a standard planning condition and would be carried out under the terms of a written scheme of investigation approved by the Borough's archaeological advisor.

# 1 Introduction

# 1.1 Origin and scope of the report

- 1.1.1 Radcliffes on behalf of Panther House Developments Limited has commissioned MOLA (Museum of London Archaeology) to carry out a historic environment assessment in advance of proposed development at 156–164 Gray's Inn Road and Panther House in the London Borough of Camden (National Grid Reference 530998 182068: Fig 1). The scheme comprises the redevelopment of the site to include retention, refurbishment and part 2, part 3 storey roof extensions of Panther House; retention and refurbishment of the Tramshed at Brain Yard; demolition of 156 and 160-164 Grays Inn Road and replacement with a 7 storey building to deliver 6,642sq.m (GIA) of employment (B1) uses across Panther House, the Tramshed and two levels of Grays Inn Road, 229sq.m of A1/A3 uses at the ground floor level of Grays Inn Road and 7 residential units (C3) equating to 949sq.m of GIA at the upper floors of the Grays Inn Road building. The existing basements across the site would be retained, no deepening or extension to the basements are planned. Details of any addition foundations required for the new and additional buildings is not known at present and for the purposes of this assessment it is assumed that foundations would be piled.
- 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 (ie, 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 (eg visible changes to historic character and views). This archaeological report is not intended to support an application for Listed Building Consent.
- 1.1.4 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (MHCLG 2019; see section 9 of this report) and to standards specified by the Chartered Institute for Archaeologists (CIfA Dec 2014, 2017), Historic England (EH 2008, 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 Historic England's National Heritage List for England (NHL) is a register of all nationally designated (protected) historic buildings and sites in England, such as scheduled monuments, listed buildings and registered parks and gardens. The List does not include any nationally designated heritage assets within the site.
- 1.2.2 There are three listed buildings adjacent to the site, 55 Gray's Inn Road, 30m to the west of the site; 63 to 69 Gray's Inn Road, 50m to the north-west of the site and the Yorkshire Grey Public House, 57m to the south-west of the site.

- 1.2.3 There is one locally listed building on the site: Panther House, is a large five-storey warehouse that was built in 1905–06 for the lithographers Malby and Sons.
- 1.2.4 The site lies within Hatton Gardens Conservation Area which is characterised by a complex network of streets with buildings of different types including Georgian terraces, late 19th/early 20th century residential block, warehouse or workshop buildings and neo-classical buildings (London Borough of Camden, August 2017).
- 1.2.5 The site lies within a Tier 2 Archaeological Priority Area (APA), London Suburbs (APA 2.11); designated as an historic urban area that contains multi-period heritage assets of archaeological interest. For the area in particular, prehistoric evidence; Roman Roads and associated activity; medieval settlement, Civil War defences and the 17th century expansion of London.

# 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 Sources

- 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 and 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 300m-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 The extent of investigations as shown on Fig 2 may represent the site outline boundary for planning purposes, rather than the actual area archaeologically investigated. Where it has not been possible from archive records to determine the extent of an archaeological investigation (as is sometimes the case with early work), a site is represented on Fig 2 only by a centrepoint
- 2.1.4 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; 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
  - Historic England information on statutory designations including scheduled monuments and listed buildings
  - The London Society Library published histories and journals
  - Landmark historic Ordnance Survey maps from the first edition (1860–70s) to the present day, and Goad fire insurance maps;
  - British Geological Survey (BGS) solid and drift geology digital map; online BGS geological borehole record data
  - Radcliffes Architectural drawings (Veretec Ltd, 2019), existing building survey (3D Services, 2015)
  - Internet web-published material including LPA local plan, and information on conservation areas and locally listed buildings.
- 2.1.5 The assessment included a site visit carried out on the 18th of September 2015 in order to determine the topography of the site, the nature of the existing buildings on the site, and to provide further information on areas of possible past ground disturbance and general historic environment potential. The buildings were accessed internally. There has been no change within to the site since that date therefore the considerations from the original visit are considered still valid. Observations made on the site visit have been incorporated into this report.

### 2.2 Methodology

- 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 80m) 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) and unless otherwise stated are measured from the approximate centre of the site or nearest part of the site boundary, or use another method as appropriate.
- 2.2.2 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.
- 2.2.3 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 156–164 Gray's Inn Road and Panther House (NGR 530998 182068: Fig 1). The site area is 0.2and is bounded by Gray's Inn Road to the west, Tiverton Mansions and 11 Mount Pleasant to the south, Mount Pleasant to the East and Dulverton Mansions and Holsworthy Square to the north. The site falls within the historic parish of St Andrew Holborn, and lay within the county of Middlesex prior to being absorbed into the administration of the Greater London Borough of Camden.
- 3.1.2 It comprises four different buildings. In the east there are three five-storey warehouse blocks which constitute Panther House, dating to 1905–06. Brain Yard, in the centre of the site, is a low building built in 1906–07 as an electricity substation for London Tramways. Number 156 Gray's Inn Road was also built in 1906–07 as a house for the supervisor on the tramways. Numbers 160–164 Gray's Inn Road are shop buildings built in 1926.
- 3.1.3 The nearest main watercourse is the River Fleet, a tributary of the Thames, which flowed roughly south-eastwards from the Hampstead area and was canalised in the 18th century (Barton 1992). Its course lies *c* 100m north-east of the site and is followed by the line of Phoenix Place and Farringdon Road. A tributary ran eastwards *c* 80m north of the site. Gravel and brickearth deposits have been eroded by such streams and rivers flowing south to join the Thames, which lies *c* 1.2km to the south of the site.

### 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 area of the site is on the western side of the valley of the Fleet, some distance from its floodplain/valley floor. There is a slight slope running downwards from south-west to the north-east reflecting the valley topography. The ground level is recorded at 20.0m Ordnance Datum (OD) on Gray's Inn Road, immediately to the west of the site and is at 17.0m OD at the corner of Laystall Street and Mount Pleasant at the north-eastern corner of the site (3D Services, dwg15/040/01, rev D, 28/07/15). Ground level in the in the open yard in the eastern part of the site is at 19.2m OD, reflecting a uniform level above the existing basement.

# 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 lies on Thames terrace gravels (BGS digital data) of the Hackney Gravel Formation overlying London Clay at depth. River alluvium associated with the River Fleet forms an arc to the *c* 80m to the north-east of the site.
- 3.3.3 A geotechnical investigation been carried out on the site by Site Analytical Services in August 2015. Two boreholes (BH1 and BH2) were dug. Borehole BH1 was excavated from the basement of Panther House. Eight trial pits were dug by GB Geotechnics in August 2015. None of the trial pits reached the natural geology. The locations of the boreholes and trial pits can be seen in Fig 3.
- 3.3.4 The results of these investigations is shown in Table 1 differentiate between modern made ground, containing identifiably modern inclusion such as concrete and plastic (but not brick or tile), and undated made ground, which may potentially contain deposits of archaeological interest. This differentiation was not apparent in the original report as it was commissioned for engineering purposes and not archaeologically monitored. In all likelihood, the undated made ground dates to the 19th century.
- 3.3.5 An archaeological watching brief was carried out at 52–54 Mount Pleasant, immediately to the

south of the site in 2013 (**HEA 5**). Four trenches were monitored with depth varying from 0.8mbgl to 1.2mbgl. No natural geology was seen in any of the trenches.

Table 1: summary of geotechnical data (Site Analytical Services 2015) Levels are in metres below ground level (mbgl)

BH/TP ref.	Ground level (m OD)	Modern made ground	Undated made ground	Top of natural (Gravel)
BH1	15.5	<0.2	0.2-0.9	0.9+
NE part of site	(in basement)			(c 3.5mbgl)
BH2	19.3	<2.0	2.0-3.1	3.1+
SW part of site				
TP1	Not recorded, in basement	<1.4	1.4–1.6+	Not reached
TP2	Not recorded, in basement	<0.6	0.6–1.1+	Not reached
TP3	Not recorded, in basement	<0.6	0.6–1.4+	Not reached
TP4	Not recorded, ground level	<2.0	2.0–2.4+	Not reached
TP5	Not recorded, in basement	<0.8	0.8–1.0+	Not reached
TP6	Not recorded, ground level	2.2+	_	Not reached
TP7	Not recorded, in basement	<0.2	0.2–1.4+	Not reached
TP8	Not recorded, in basement	<0.2	0.2–1.6+	Not reached

# 4 Archaeological and historical background

# 4.1 Overview of past investigations

- 4.1.1 There have been no investigations within the site itself. The nearest investigation was a watching brief undertaken by MOLA in 2013 at 52–54 Mount Pleasant, immediately to the south of the site (**HEA 5**). Excavation work on new foundations, on drainage trenches and storage tank was monitored. A 17th century deposit and remains of Victorian foundation walls, which may have been from buildings of the Holborn Union Workhouse, were identified in one of the trenches. Natural ground was not reached in any of the monitored areas
- 4.1.2 A further 12 investigations have been carried out within the study area. Post-medieval remains were recorded at all these investigations; no remains from earlier period were recorded. Alluvial deposits associated with the River Fleet were recorded at two sites some distance to the north and east of the site (**HEA 14** and **18**).
- 4.1.3 The results of these investigations, along with other known sites and finds within the study area, are discussed by period, below. The date ranges below are approximate.

# 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 England saw continuous occupation. Erosion has removed much of the Palaeolithic land surfaces and finds are typically residual. There are no known finds dated to this period within the study area.
- 4.2.2 The Mesolithic hunter-gatherer communities of the postglacial period (10,000–4000 BC) inhabited a still largely wooded environment. The river valleys and coast 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. There are no known finds dated to these periods within the study area.

### Roman period (AD 43-410)

- 4.2.4 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, 1.0km 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 in several directions from *Londinium*, and the basic pattern of the Roman road system was defined during this early period. Small settlements, typically located along the major roads, acted as both producers and markets for the capital (MoLAS 2000, 150). During this period, the site probably within the agricultural hinterland.
- 4.2.5 A road, possibly of pre-Roman origin, ran from Old Ford (in the east), by-passed *Londinium* and then joined the Silchester road to the west (VCH *Middlesex* i, 1969, 64–74). Parts of these routes have been inferred from past excavations. One crossed the study area on an east-west alignment just south of Theobald's Road, *c* 150m south of the site (see Fig 2) (Margary 1967, 57).

- 4.2.6 Roman law required the dead to be buried outside the city perimeter. Cemeteries were established alongside roads and were in use from the 1st to the 4th centuries AD. Within the study area the HER notes the antiquarian discovery of two burial urns on Gray's Inn Road, possibly at the Holborn end (**HEA 21**) *c* 50m to the south of the site. The extent of Western Cemetery of the Roman city is uncertain; however, its nucleus is believed to be in the Holborn/Smithfield area, *c* 700m to the south-east of the site (Hall 1996, 58–9). There is no clear evidence for an extensive cemetery alongside the section of the road that runs south of the site.
- 4.2.7 Two findspots of Roman coins are noted within the study area. At Gray's Inn Road (**HEA 22**), *c* 50m south of the site, a coin of Claudius was found. At Gough Street (**HEA 26**), *c* 230m north of the site, a coin of Claudius or Germanicus was found in the Fleet Ditch.

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

- 4.2.8 Following the withdrawal of the Roman army from England in the early 5th century AD the whole country fell into an extended period of socio-economic decline. 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 nucleated settlements served by a parish church.
- 4.2.9 In London the trading port of *Lundenwic* developed in the area now occupied by Aldwych, the Strand and Covent Garden, *c* 1.2km to the south-west of the site (Cowie and Blackmore 2008, xv). With the Danish invasions of the late 9th century, the old walled Roman city was reoccupied in AD 886 by Alfred as a *burh* (fortified place).
- 4.2.10 The name Holborn may derive from the Anglo-Saxon *hol*, a hollow, and *burna*, a stream. This was the name given to the upper (non tidal) reaches of the river; *Fleet* was from the Anglo-Saxon word meaning tidal inlet (Weinreb and Hibbert 1995, 292). The church of St Andrew (GLHER no. 200726, 041888) beside modern Holborn Circus, *c* 700m to the south-east of the site, is first mentioned in documentary sources in AD 951 and 959, which refer to the 'old wooden church' with the dedication 'Sancte Andreas' beside the 'wide army street', which both suggests a mid Saxon origin and that the church adjoined a reused Roman road, at an important crossing of the River Fleet (Schofield 1984, 32; Weinreb and Hibbert 1995, 710). The church probably formed the focus for a small settlement. The GLHER includes the possible location of the medieval village on the eastern edge of the parish at the junction of modern Farringdon Road and Charterhouse Street, *c* 675m to the south-east of the site (GLHER no. 082859).
- 4.2.11 Towards the end of the period, references to manors, large landed estates which often formed the centre of local administration, begin to appear in documentary records. The area appears to have been a mixture of pasture, cultivated land and woodland, probably supplying produce to the City. *Holeburne* is recorded in Domesday Book (AD1086), with rents raised from two cottars (peasant cottagers) (*Domesday*, eds Williams and Martin 1992, 358). Part of Bloomsbury to the west is recorded as having vineyards and woodland for 100 pigs (Weinreb and Hibbert 1995, 76).
- 4.2.12 Throughout this period, the site probably lay in fields away from the main areas of settlement.

### Later medieval period (AD 1066–1485)

- 4.2.13 At the end of the 12th century, the writer William FitzStephen recorded that the area north of the medieval City of London, possibly including the site, provided a place of recreation for its residents, with flowing streams, and springs and mills. The fields were used for pasture, as well as crops (quoted in Stow, 23–24).
- 4.2.14 The management of at least part of the land appears to have passed into the hands of the Greyfriars (Franciscan Brothers) of Newgate. In 1258, they had established a water supply system for the monastery, sourced near the Fleet River, but at the end of the 13th century the supply was declared inadequate and the lead pipe was extended to a reservoir in the vicinity of Queen Square, c 600m to the west of the site, which was fed by nearby springs. A conduit associated with the reservoir, the Devil's or Chimney conduit (GLHER 082018) remained accessible under 20 Queen Square until 1911 (LeFaye 1980). A fragment of lead supply pipe possibly associated with the conduit was found in Theobald's Road (HEA 24), c 160m to the south-west of the site.
- 4.2.15 During this period, the banks of the River Fleet, located beyond the main settled areas.

became a focus for often noxious industries such as tanning. During the 14th and 15th centuries the Fleet was used for the disposal of butchery waste and as early as 1307 there were complaints that the river was no longer navigable (Thornbury 1878, 416–426). Despite cleansing, the river was not returned to its original state; it was much reduced in breadth and depth and continued to cause problems for the City, as it repeatedly became choked with waste (Weinreb and Hibbert 1995, 292).

- 4.2.16 In 1348, a local armourer called John Thavie bequeathed a large estate in the area to the upkeep forever of the parish church; the legacy was kept intact at the reformation and still funds the maintenance of the church today (St Andrew Holborn website). The tower and north and south aisles of the parish church were rebuilt around 1446 (Weinreb and Hibbert 1995, 710).
- 4.2.17 Throughout this period, the site probably continued to lie in fields.

#### Post-medieval period (AD 1485-present)

- 4.2.18 The urban fabric established by the later medieval period was consolidated and expanded in the following centuries. In the 16th century, Gray's Inn received formal gardens and walks (**HEA 30**) *c* 200m south-west of the site. These were designed by Francis Bacon and subsequently altered. They are marked on Agas's map of 1562 (Fig 4), which shows the site in open fields, on the edge of the settled area along Gray's Inn Road, where a few houses are indicated to the south of the site. Faithorne and Newcourt's map of 1658 (not reproduced) shows the site was still in fields at this date, although there were buildings just to the south of a road corresponding to modern Clerkenell Road.
- 4.2.19 The Civil War (1642–6) earthwork defences of London are believed to have run in the area of Lamb's Conduit Street, *c* 280m west of the site. This 17km-long bank-and-ditch fortification, interspersed with batteries and forts, was erected to protect London, the Parliamentary capital, from Royalist attacks (Sturdy 1975, 334). The circuit was short lived and dismantled following the Parliamentary victory in 1647. In its original form, it enclosed fields and meadows beyond the suburbs, and was the most extensive city defence known in 17th-century Europe (*ibid*.). Great Ormond Street, *c* 250m north-west of the site, is thought to lie on or just north of the projected line (*ibid*, 338). Extrapolation of this eastwards suggests that the defences ran *c* 200m to the north of the site (see Fig 2) and backfilled trenches interpreted as Civil War Defence Trenches were identified during evaluations in 2017 (**HEA 9**). Whilst the defences would not have been straight but zigged-zagged, they were probably far enough from the site not to have extended into it.
- 4.2.20 Morgan's map of 1682 (Fig 5) is the first map to show development on the site. It shows small rectangular buildings, probably houses along Gray's Inn Road, and extending back from the road, in the west of the site. A small square building was in the centre of the site. The centre and east of the site were mainly open yard or gardens. A small lane ran south-east to north-west through the eastern part of the site. To the north-east of the site, the River Fleet can be seen. In 2013, archaeological investigations by MOLA immediately south of the site at 52–54 Mount Pleasant (**HEA 5**) recorded among other things 17th century remains in the form of dark grey silt dated by some potsherds and a group of clay pipes dated between 1660–80 probably associated with the period when the area became intensively populated. The limited extent of these deposits does not allow for any further interpretation.
- 4.2.21 The *Act for the Relief of the Poor of 1601* obliged parishes to take care of the aged and needy in their area. Parish overseers were empowered to collect a local income tax known as the poor-rate which would be put towards the relief of the poor. Early workhouses were constructed and managed by the parish. In 1730, a workhouse was established in the eastern half of the site by the Society for Promoting Christian Knowledge (Workhouses website). It catered for 46 men, women, and children belonging to the Liberty of Hatton-Garden, Saffron-Hill, and Ely-Rents. The parish officers 'fitted up several old Houses for this use, and added a new Brick Building to them, the upper part of which serves for a Dining-Room, and the lower part for a Working-room, where they spin Candlewick, and by the Industry and Cleanliness of the Master and Mistress, the Poor here seem to be happily provided for.' (workhouses.org.uk/Holborn/).
- 4.2.22 The workhouse is seen in the eastern part of the site on Rocque's map of 1746 (Fig 6), although this is a small scale map that shows built up areas indicatively rather than individual

buildings and open spaces in any detail. In the western part of the site were 'Stafford's Almshouses', which provided accommodation to elderly poor (captured in a painting by John Crowther in 1882; not reproduced). The remainder of the site was a mixture of buildings and open yard areas.

- 4.2.23 Faden's 1813 revision of Horwood's map of 1799 (Fig 7) shows the site in more detail. The original workhouse building had been extended to the north and a new building constructed in the north-east of the site. Stafford's Almshouses consisted of five properties. The centre of the site was still an open yard area.
- 4.2.24 The Holborn Poor Law Union was formed in 1836 and took over the Gray's Inn Lane (later Road) parish workhouse in 1838 (workhouses.org.uk/Holborn/). In 1838, the Poor Law Commissioners authorized the sum of £9,000 for its enlargement. This probably extended the complex to include the central part of the site, right up to the Stafford Almhouses on Gray's Inn Road. In 2013, archaeological investigation immediately south of the site at 52–54 Mount Pleasant (HEA 5) recorded remains of Victorian foundation walls at the north-west corner, thought to be part of the workhouse.
- 4.2.25 The Ordnance Survey 1st edition 5ft:mile map of 1872 (Fig 8) shows the Holborn Union Workhouse extending over the majority of the site. In the west of the site the almshouses were still extant. The triangular block of older buildings around Brain Yard in the eastern part of the site, a similar layout to the existing warehouses, appear unchanged. One of the main blocks still houses the dining hall.
- 4.2.26 In the late 19th century, a campaign of road improvement began aimed at tackling the notorious slums in the Fleet valley. In 1879–80, Gray's Inn Road was widened and Clerkenwell Road was constructed on the line of the old Liquor Pond Street to link it to Goswell Road to the east. The new road linked New Oxford Street and Theobald's Road with Old Street and Shoreditch (Weinreb and Hibbert 1993, 332). The Griffin pub (**HEA 23**) on Clerkenwell Road, c 90m south of the site, now stands in the vicinity of the site of one London's largest breweries (the griffin is the emblem of Gray's Inn) (the brewery is shown on the Ordnance Survey 1st edition map) (*ibid*, 188).
- 4.2.27 Stafford Almshouses in the western part of the site were demolished in the 1890s (Robey). The Ordnance Survey 2nd edition 5ft:mile map of 1894–96 (Fig 9) shows the area of the almshouses as vacant.
- 4.2.28 The Goad Fire Insurance map of 1901 (Fig 10) notes that workhouse site was vacated in November 1900. In 1902, the workhouse building immediately to the south of the site were redeveloped as casual wards (workhouses.org.uk/Holborn/).
- 4.2.29 In 1905–06 Panther House, 38 Mount Pleasant, a brick built five-storey warehouse, was built on the eastern part of the site, occupying much the same footprint as the workhouse buildings. Panther House was used by the lithographers Malby and Sons from 1907 to 1923 (Robey) The Ordnance Survey 3rd edition 25":mile map of 1916 (Fig 11) shows the site following the redevelopment.
- 4.2.30 The London County Council Bomb Damage Maps (not reproduced) indicate that the buildings on the site were not damaged in World War 2 (Woolven & Saunders, 2005).
- 4.2.31 The Goad Fire Insurance plan of 1942 (Fig 12) shows the use and layout of the site in detail. No. 156 Gray's Inn Road was a dwelling; No. 160 was a restaurant and Nos 162 and 164 were shops. None of these buildings are marked as having a basement. Brain Yard is denoted as the London Passenger Transport Motor Generator Sub-station and marked as having a basement. Panther House is denoted as containing various businesses and factories. The buildings are marked as having basements.
- 4.2.32 The Ordnance Survey 1:2500 scale map of 1952 (Fig 13). The layout of the site is unchanged to the present day.
- 4.2.33 The buildings on the site currently have a variety different uses. Panther House is occupied by a number of small business and start-up companies. Small business units utilise Brain Yard for commercial/light industrial use. Nos. 160–164 Gray's Inn Road is used for shops, a restaurant and offices. 156 Gray's Inn Road is in use as a shop with residential accommodation above.

# 5 Statement of significance

#### 5.1 Introduction

- 5.1.1 The following section discusses historic impacts on the site which may have compromised archaeological survival from earlier periods, identified primarily from historic maps, and information on the likely depth of deposits.
- 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 Current ground level lies at 17.0–20.0m OD (the ground slopes down from south-west to north-east reflecting the western side of the Fleet valley). Within the open yard in the eastern part of the site (over the existing basement), ground level is at 19.2m OD. Based geotechnical data, the predicted level of natural geology within the site is as follows:
  - The top of probably truncated Gravel lies at 14.6–16.2m OD (3.1–3.5mbgl)
- 5.2.2 Between the top of the natural and the current ground level is modern made ground and undated made ground, which may potentially contain archaeological remains of post-medieval development and possibly earlier remains.

#### Past impacts

- 5.2.3 Archaeological survival potential is varied across the site.
- 5.2.4 There are existing basements on the site under Panther House and Brain Yard (Fig 15).
- The finished floor level (FFL) of the Panther House basement in the eastern third of the site is at 15.5–15.6m OD. Taking into account an assumed slab thickness of 0.4m, the formation level would be at 15.1–15.2m OD (4.0m below the yard level, around 2.0 below the adjacent street level to the east). The construction of the basement will have removed or heavily truncated any archaeological remains, possibly other than the bases of deep cut features such as pits and ditches. Survival potential here is considered to be low but possibly moderate towards the eastern edge of the site.
- 5.2.6 The FFL of the Brain Yard warehouse basement, which is shallower, in the central part of the site, is 17.7m OD. Taking into account an assumed slab thickness of 0.4m, the formation level would be at 17.3m OD (around 2.2mbgl). The construction of the basement will have removed or truncated any archaeological remains although the bases of cut features such as pits and ditches and footings of buildings survive. Survival potential here is considered to be moderate.
- 5.2.7 Numbers 156–164 Gray's Inn Road do not have basements and archaeological survival will be high in this part of the site.

#### Likely depth/thickness of archaeological remains

5.2.8 There is possibly up to 3.4m of made ground on the site. The undated made ground may contain archaeological remains of 18th or 19th century development. It is possible that deep cut features, such as wells or rubbish pits may survive cut into the natural gravels.

### 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 archaeological remains dated to the prehistoric period.

The site's location on the well-drained Hackney Gravel terrace close to predictable resources of the River Fleet would have made the area attractive for settlement. Despite this, there is no evidence for prehistoric activity within the study area, possibly as a result of post-medieval development and truncation.

- 5.3.3 The site has a low or moderate potential to contain archaeological remains dated to the Roman period. The site lies close to a major Roman route and evidence of roadside activity may be present. Although there is little evidence of settlement around the site, isolated Roman burials and other chance finds have been recorded in the vicinity. There is potential for Roman funerary evidence or other artefacts, although there is no clear evidence for an extensive cemetery alongside the section of the road that runs south the site. In addition, Roman relict agricultural features (such as field ditches) could be present beside the roadways as could quarry pits into the gravel, to provide for the frequent repair/re-metalling of the nearby roads. The significance of any Roman remains, if present, would be **low** for residual finds to **medium** for agricultural features or **high** for burial remains, on the basis of evidential value.
- The site has a low potential to contain archaeological remains dated to the medieval periods. The site lies to the north-east of the area of Saxon Lundenwic and is likely to have been in marginal land outside the settlement. Archaeological remains from the Saxon period have not been recorded in the immediate vicinity of the site. Limited archaeological remains from the later medieval period recorded in the study area. The site is likely to have occupied open ground in this period.
- 5.3.5 The site has a high potential to contain archaeological remains dated to the post-medieval period. Archaeological remains from at least the 16th century onwards, including buildings, cellars and foundations, pits and drains, have been recorded from previous archaeological evaluations in the study area. Historic mapping shows that the site was first developed in the late 17th century. Building on the site included 18th century almshouses in the west and a mid-18th century workhouse in the east, which was extended across the central part of the site in the mid-19th century. Archaeological investigation at the adjoining site of 52–54 Mount Pleasant recorded 17th century remains and 19th century brick foundations probably associated with the Holborn Union Workhouse. Any remains of buried building footings from this period are likely to be of **low** significance with historic and evidential interest.

# 6 Impact of proposals

### 6.1 Proposals

- 6.1.1 The scheme comprises the development of the site to include the following:
  - The refurbishment and part 2, part 3 storey roof extensions of Panther House;
  - The retention and refurbishment of the Tramshed at Brain Yard; and
  - The demolition of 156 and 160-164 Grays Inn Road and replacement with a 7 storey building
  - Covered areas in the courtyard will be removed and used as an open courtyard and bike storage area (figs 17–19).
- The development would deliver 6,642sq.m (GIA) of employment (B1) uses across Panther House, the Tramshed and two levels of Grays Inn Road, 229sq.m of A1/A3 uses at the ground floor level of Grays Inn Road and 7 residential units (C3) equating to 949sq.m of GIA at the upper floors of the Grays Inn Road building.
- 6.1.3 The existing basements across the site would be retained, no deepening or extension to the basements are planned.
- 6.1.4 Details of any addition foundations required for the new and additional buildings is not known at present and for the purposes of this assessment it is assumed that foundations would be piled.

### 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 main potential for the site is for footings and buried remains associated with late 17th century and later buildings, of low significance, and possibly Roman burials, potential of high significance, if present.

#### Demolition

6.2.4 Demolition, including breaking out the existing foundation/floor slab for piling, would cause ground disturbance to a maximum depth of 0.5mbgl as assumed for the purposes of this assessment. This would mainly affect modern made ground, however could potentially have an impact, truncating or removing entirely any archaeological remains directly beneath the slab. This might include remains buried footings of 18th to 19th century buildings.

#### Piled foundations

- 6.2.5 Any archaeological remains within the footprint of each pile would be completely removed as the pile is driven downwards. The severity of the impact would depend on the pile size, type and density. Any archaeological remains in between each pile has the potential to survive, however would be inaccessible for archaeological investigations in the future.
- 6.2.6 The insertion of pile caps and connecting ground beams, along the excavation of a pile guide trench, typically extend no more than 1.0–1.5mbgl and would remove any archaeological remains within the footprint of these works to this depth impacting only post-medieval remains of low significance. Piled foundations have not yet been confirmed therefore the pile type is not currently known.

### Services and Landscaping

6.2.7 Excavation of new service trenches and drains would extend to a depth of 1.0–1.5mbgl as assumed for the purposes of this assessment. This would entirely remove archaeological remains within the trench footprint, to its maximum depth, affecting only remains of low significance. The significance of any remains directly affected would be reduced to negligible or nil.

# 7 Conclusions and recommendations

- 7.1.1 The site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments, listed building or registered parks and gardens. The site is within the Tier 2 London Suburbs Archaeological Priority Area and the Hatton Gardens Conservation Area
- 7.1.2 Archaeological survival potential is likely to vary across the site. It will be low in the area of Panther House, and moderate beneath the Brain Yard warehouse due to the existing basements. Outside basemented area, in the western third of the site, survival potential will be high.
- 7.1.3 The construction of piled foundations and services would entirely remove or severely truncate any archaeological remains within the footprint of each foundation, trench or excavation. Demolition is likely to only affect modern made ground but in areas where undated made ground is closer to the modern ground surface, could impact upon made ground likely to be of 18th to 19th century date.
- 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 heritage assets (prior to mitigation)

Asset	Asset Significance	Impact of proposed scheme
Remains of post-medieval development of the site including buried footings of 18th century almshouses and an 18th-19th century workhouse (High potential)	Low	Demolition, piling foundations and digging of service trenches.
Previously unrecorded archaeological remains dating from the Roman period (Low potential for burial remains or moderate potential for agricultural remains)	Low (for isolated find), medium (for agricultural ditches) to high (for burials)	Significance of asset reduced to negligible or nil

- 7.1.5 Although the site lies within an Archaeological Priority Area, no likely assets of high or very high significance have been identified within the site. Therefore, it is likely that the Borough would require further investigation to determine the nature, extent and significance of any remains. Such an investigation could take the form of targeted evaluation test pits.
- 7.1.6 The results would determine the most appropriate mitigation strategy if required, which could take the form of an excavation in the case of significant remains and/or a watching brief during ground preparation in the case of less substantive remains and of lesser significance to ensure that any previously unrecorded archaeological assets present are not removed without record. Such work could take place under a standard planning condition and would be carried out under the terms of a written scheme of investigation approved by the Borough's archaeological advisor.

# 8 Gazetteer of known historic environment assets

- 8.1.1 The gazetteer lists known historic environment sites and finds within the 300m-radius study area around the site. The gazetteer should be read in conjunction with Fig 2.
- 8.1.2 The GLHER data contained within this gazetteer was obtained on 07/08/2019 and is the copyright of Historic England 2019.
- 8.1.3 Historic England statutory designations data © Historic England 2019. Contains Ordnance Survey data © Crown copyright and database right 2019. The Historic England GIS Data contained in this material was obtained in April 2019. The most publicly available up to date Historic England GIS Data can be obtained from http://www.historicengland.org.uk.

Abbreviations

AOC - AOC Archaeology

ASE - Archaeology South East

CA – Compass Archaeology

CgMs - CgMs Consulting

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

ELO – GLHER unique event identifier

GLHER - Greater London Historic Environment Record

ILAU - Inner London Archaeological Unit

MLO – GLHER unique monument identifier

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

NHL – National Heritage List for England (Historic England)

PCA – Pre-Construct Archaeology

HEA No.	Description	Site code/ HER No.
1	Gray's Inn Road, WC1	MLO107083
	The site of an 18th century workhouse.	10120107000
	The first historical reference that suggested a workhouse within Holborn had been set	
	up was in the 1730 early workhouse directory 'An Account of Several Workhouses'. In	
	April 1836, a Board of Guardians representing a number of Holborn Parishes was	
	entrusted with caring for the local poor of Holborn. In 1838 the Poor Law	
	Commissioners authorized £9,000 to be spent on enlarging the Gray's Inn road	
	workhouse. In 1902, the Gray's Inn workhouse was renovated into a 'H'-shaped	
	structure. The site then became classed as a 'casual ward' which individuals seeking	
	work stayed on a short term basis. In 1923, the site was classed as a hostel admitting	
2	from 1,000 to 2,500 people each year.	1112000
2	63–69 Gray's Inn Road, WC1 Grade Il Listed Building	1113099
	Row of four terraced house with later shop, from <i>c</i> 1791. Built of multi-coloured stock	
	brick with some patching and re-facing.	
3	55 Gray's Inn Road, WC1	1113098
	Grade II Listed Building	
	Terraced house with later shop, from <i>c</i> 1714. The shopfront is dated 1882 on fascia	
	brackets. Built of multi-coloured stock brick with red brick dressings	
4	Yorkshire Grey Public House, Theobalds Road, WC1	1379006
	Grade II Listed Building	
	Public house from 1877 by J W Brooker. The interior was altered in the late 20th	
	century. Built of pale stock brick with stucco dressings.	

HEA No.	Description	Site code/ HER No.
5	<b>52–54 Mount Pleasant, WC1</b> Watching brief, MOLA, 2013 Carried out during redevelopment of the existing building. Natural ground was not reached in any of the monitored areas as it was probably truncated by the foundations of the 20th century buildings and modern drains. 17th century deposits of dark grey silt were recorded in the central part of the site; these were dated by some potsherds and a group of 7 clay pipes dated between 1660 and 1680 and are probably associated with the period when the area became intensively populated. The limited extent of these deposits does not allow for any further interpretation. Remains of Victorian foundation walls were identified in the trench at the north-west corner of the site. The walls were most probably part of the Holborn Union Workhouse known to be in the area.	MPT13 ELO12193
6	39–45 Gray's Inn Road, WC1  Excavation, ASE, 2014  The site contained 18th-19th century features. These included wells and cess/rubbish pits associated with previous housing on the site. A layer of re-deposited brickearth and a pit dating to the 13th-14th century were also observed in the south of the site.	ELO14149 GRY13
7	28 Kings Mews, WC1  Evaluation, MOLA, 2017  One evaluation trench was placed revealing undated quarrying and agricultural activity observed as the earliest archaeological deposits, followed by post-medieval yard and garden activity. Dumps, crude pathways and garden soils were evident along with 18th/19th century brick lined soakway. Archaeological deposits are expected within the rest of the development area between 1.6mbgl to 2.9mbgl.  Natural geology was observed at 18.8m OD (2.6mblg).	ELO17225
8	14 Roger Street, WC1  Watching Brief and Excavation, PCA, 2014  Five phases of exclusively post-medieval activity was observed directly overlying the natural gravels. Finds included large quantities of post-medieval pottery, clay pipes, medieval and post-medieval floor and roof tiles. Features such as pits, backfills of Civil War defensive and 17th and 18th century dump layers were revealed.  Natural geology was observed at 12.7m OD.	ROG14 ELO14856
9	Land at Pheonix Place, Mount Pleasant, WC1  Evaluation, ASE, 2017  Three evaluation trenches were excavated, Hackney gravels were observed between 13.7m and 14.5m OD and London Clay in trench 3 was seen at 13m to 14.4m OD. 17th century make up layers were overlying the natural with Civil War defences cutting through subsoil and make up layers into the natural. The lack of 18th and 19th century deposits in trench 2 and 3 suggest the site was occupied by a building, later confirmed by historic mapping.	ELO17763
10	Royal Mail Group, Calthorpe Street, WC1  Watching Brief, MOLA, 2016  The watching brief consisted of the monitoring of 56 geotechnical investigations.  Archaeological deposits were principally of post-medieval origins consisting of dumps, building rubble and brick footings.  Natural geology was observed between 7m and 14.3m OD.	ELO17356
11	Laystall Street, EC1 Watching Brief, ILAU, 1977 This revealed extensive tips of 16th–17th century garden soil.	LST77 ELO3945 MLO631
12	Latchford's Timber Yard (Former), 24–28 Warner Street, EC1  Evaluation and geoarchaeological survey, AOC, 2012.  Two layers of possible demolition deposits, truncated by a modern concrete footing, were recorded. The only remains of the former Red Lion pub was a large limestone and brick work block which may have been part of the building. The geoarchaeological investigation very thick made ground overlying a sequence of silty sandy clays and gravels. The results indicated that no fluvial sediments of the River Fleet were present on the site.	WAR12 ELO12455

HEA No.	Description	Site code/ HER No.
13	Thames Water Mains Replacement Work, Mount Pleasant, Farringdon Road, EC1 Watching Brief, CA, 2011  A watching brief was undertaken associated with Thames Water's replacement of water mains in the vicinity of Mount Pleasant, Rosebery Avenue, Farringdon Road and Clerkenwell Road,. In situ archaeology was limited: a section of 18th century wall probably associated with the Clerkenwell House of Correction was recorded on the north-west side of Roseberry Avenue opposite the Mount Pleasant Post Office, and a large well/cistern opposite 6 Topham Street. Several 19th century coal cellars were also observed.	TXC11 ELO12509
14	Electricity Substation (main entrance), Warner Street, EC1 Watching Brief, MoLAS, 1997. Sandy deposits associated with the foreshore of the Fleet and dated to the mid-17th century were overlaid by a peaty deposit, indicating still water. The latter, dated to the end of the 17th century, contained many copper pins. It was overlaid by a very thick dumped deposit which was probably connected with the canalisation of this stretch of the river, known to have been carried out in the 1st half of the 18th century.	WRS97 ELO14544
15	Black Bull Yard, Leather Lane, Clerkenwell, EC1 Watching Brief, CgMs, 2004. The basementing of the site, associated with a late 19th century brewery complex, had truncated the site. Natural geology was observed at 17.3m OD.	LLC04 ELO5017
16	Warner Street, Topham Street, Baker's Row, EC1 Watching Brief, DGLA, 1988 Monitoring of the excavation of a series of trenches and pits for a water pipeline along Topham Street, Warner Street and Baker's Row, EC1. Trenches on Baker's Row and Warner Street cut through post-medieval building debris containing bricks, modern pottery, animal bone and tobacco pipe stems; this overlay earlier made ground. Of five shafts dug to a depth of c.4.6m only two were examined; these cut into natural gravels.	ROS88 ELO9747
17	London Electricity Board Shaft, Back Hill, Ray Street (junction), EC1 Watching Brief, MoLAS, 1999. Landfill dumps, dated to the 17th-18th century, were observed. Natural geology was observed at 6.5m OD.	BKI99 FND00 ELO957
18	Mount Pleasant Post Office, Mount Pleasant, Farringdon Road, Rosebery Avenue, WC1  Evaluation and Watching Brief, MoLAS, 1992-3.  On the W side of the site the alluvial deposits of the E edge of the River Fleet were located. They were sealed by at least two phases of dumping: the first was early post-medieval in date and seems to represent random deposition from the river bank; the second was apparently part of a deliberate attempt to create a terraced platform which projected out from the E edge of the river valley. Above the platform were extensive brick foundations and walls which were probably part of a prison known as The Middlesex House of Correction (1794-1889). The E side of the site was truncated by the post office building.  London Clay was observed at 9.1m and 13.4m OD	MPO92 ELO4061
19	8 Herbal Hill, EC1 Watching Brief, AOC, 2010. Four trenches in the basement of the property were monitored. London Clay was overlain by natural gravels and one main phase of archaeological activity was identified, comprising a sequence of made ground dumps and a boundary ditch of late 16th to 17th- century date.	HBL10
20	Mount Pleasant Sorting Office, Farringdon Road, EC1 Watching Brief, MoLAS, 2005. Twelve geotechnical test pits were excavated in four areas of the site. Those on the Phoenix Place part of the site revealed 18th century dump deposits below modern rubble and the concrete slab. Backfill or levelling deposits of 18th century date were also encountered in the north area of the site.	FDR05
21	Gray's Inn Road, possibly Holborn end, EC1  Findspot  Antiquarian find of two cremations in urns, one is grayware with a smoothed lattice pattern of around 100 to 150 AD, the other is biconical buffware	MLO177
22	Gray's Inn Road, EC1 Findspot The findspot of a Roman coin of Claudius.	MLO717

HEA No.	Description	Site code/ HER No.
23	Site of the Griffin Brewery, EC1	MLO192
	GLHER Location The Griffin pub on Clerkenwell Road is now in the vicinity of where the (post-medieval)	
	brewery used to stand, possibly on the same site. It became one of the largest	
	breweries in London. The griffin is the emblem of Gray's Inn.	
24	Opposite No. 26 Theobalds Road, WC1	MLO696
	Findspot	
	A medieval wooden conduit in excellent state of preservation was found during works on tram electrification in 1905. Thought at the time to be associated with nearby Lambs	
	Conduit.	
25	49 Doughty Street, WC1	MLO614
	Findspot	
	Brick cellars with a sandstone wall and mouldings, of possible medieval age. Other	
	cellars under the pavements in the southern half of the street have end walls of	
	masonry construction, suggesting the demolition of a large medieval building (location	
26	unknown).  Gough Street, WC1	MLO177
20	Findspot	IVILOTIT
	The findspot of a Roman coin of Germanicus or Claudius found in the Fleet Ditch	
27	Cold Bath Square	MLO257
	GLHER Location	
00	The site of the 17th century Cold Bath well.	MI 0470
28	Furnival's Inn, EC1 GLHER Location	MLO178
	The site of Furnival's Inn, established in 1383, the Inn was dissolved and the building	
	destroyed in 1817	
29	Portpool Lane, EC1	MLO178
	Medieval Road	
20	The route of a medieval lane known from 1237.	NII II 4000254
30	Gray's Inn Medieval Courts and Registered Parks and Gardens	NHL1000351 MLO59307
	Grade II* Registered gardens and medieval Inns of Court. The Society of Gray's Inn	MLO212
	settled on the site c14, with the medieval buildings grouped around what is now south	WEGZIZ
	square. The earliest surviving building is the hall 'redified' 1556-60, but extensively	
	rebuilt c1950. Grays Inn Square was built c1676-88. The gardens were laid out c1598,	
	legend suggests by Francis bacon. They now contain early 19th century chambers,	
	Raymond and Verulam buildings. Grays Inn suffered extensive damage during the second world war and was rebuilt c1950-60 in a neo-Georgian style sympathetic to the	
	old work. Grays inn was formerly the manor house of St Pauls Prebend of Portpoole. It	
	became the property of Degrays of Wilton <i>c</i> 1294.	
31	Leather Lane	MLO178
	Medieval Road	
	The route of a medieval lane known. In 1241, this was known as Le Vrunelane. Agas's	
	map, in 1550 to 1570, shows it as Liver Lane. By Rocque's map in 1746, it is Leather Lane.	
32	Bloomsbury Way	MLO571
	Medieval Road	
	The route of a post-medieval lane. Appears on Agas's map as an unnamed road, and	
	on Rocque's map as Theobalds Row.	
33	Gray's Inn Road  The site of modicus houndary markers. In 1120, houndaries were not up to mark the	082060
	The site of medieval boundary markers. In 1130, boundaries were set up to mark the	

# 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 (Faculty consent 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). The 2012 NPPF was revised and a new NPPF published in July 2018, with minor revisions in February 2019 (MHCLG 2019).

#### Conserving and enhancing the historic environment

9.2.2 The NPPF section concerning "Conserving and enhancing the historic environment" (section 12 of the NPPF 2012) has been replaced by NPPF 2018 Section 16 (unchanged in February 2019), reproduced in full below:

**Para 184**. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

**Para 185**. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and

• d) opportunities to draw on the contribution made by the historic environment to the character of a place.

**Para 186**. 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 187.** Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

**Para 188**. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

#### Proposals affecting heritage assets

**Para 189.** 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 190.** 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 into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

**Para 191.** 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 192. In determining applications, local planning authorities should take account of:

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

#### Considering potential impacts

**Para 193.** 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

**Para 194**. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

**Para 195.** 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 total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

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

**Para 196.** 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, where appropriate, securing its optimum viable use.

**Para 197.** 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 directly or indirectly affect 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 198.** Local planning authorities should not permit the 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 199.** Local planning authorities should 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.

**Para 200.** 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 the asset (or which better reveal its significance) should be treated favourably.

**Para 201.** Not all elements of a Conservation Area or World Heritage Site 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 195 or less than substantial harm under paragraph 196, 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 202.** 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.

# 9.3 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).
- 9.3.2 Policy 7.8 of the adopted (2016) London Plan 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.
- 9.3.3 Para. 7.31 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 of the benefits of departing from those policies outweigh the disbenefits.'
- 9.3.4 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'.
- 9.3.5 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'.

#### The Draft New London Plan showing Minor Suggested Changes

- 9.3.6 The current 2016 consolidation Plan is still the adopted Development Plan. However, consultation on revisions to the Plan closed on 2nd March 2018, and the Draft New London Plan showing Minor Suggested Changes, which includes clarifications, corrections and factual updates to the Consultation Draft Plan that will help inform the Examination in Public, was published on 13th August 2018. (GLA website, 2017).
- 9.3.7 Policy HC1 "Heritage conservation and growth" of the Draft New London Plan (as set out here incorporating published minor changes to the consultation Draft) relates to London's historic environment:
  - A Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
  - B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
    - 1) setting out a clear vision that recognises and embeds the role of heritage in placemaking
    - 2) utilising the heritage significance of a site or area in the planning and design process
    - 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
    - 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.
  - C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should

avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

- D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.
- 9.3.8 Para. 7.1.8 adds 'Where there is evidence of **deliberate neglect** of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset should not be taken into account when making a decision on a development proposal'.
- 9.3.9 Para 7.1.11 adds 'Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains can be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.

### 9.4 Local planning policy

- 9.4.1 Following the Planning and Compulsory Purchase Act 2004, Planning Authorities have replaced their Unitary Development Plans (UDPs), Local Plans and Supplementary Planning Guidance with a new system of Local Development Frameworks (LDFs). UDP policies have been 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 Local Plan was adopted in 2017 and covers development in the borough from 2016 to 2031. Policy D2 covers Design and Heritage within the borough:

#### Policy D2 Heritage

The Council will preserve and, where appropriate, enhance 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 and locally listed heritage assets.

#### **Designated heritage assets**

Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, 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:

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

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

#### **Conservation areas**

Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. In order to maintain the character of Camden's conservation areas, the Council will take account of conservation

area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

#### **Listed Buildings**

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.

#### **Archaeology**

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

#### Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.

# 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 Consultation on draft revisions to the original Conservation Principles document which set out the four values was open from November 2017 until February 2018. The revisions aim to make them more closely aligned with the terms used in the NPPF (which are also used in designation and planning legislation): i.e. as archaeological, architectural, artistic and historic interest. This is in the interests of consistency, and to support the use of the Conservation Principles in more technical decision-making (HE 2017).
- 10.1.3 Table 2 gives examples of the significance of designated and non-designated heritage assets.

Table 2: Significance of heritage assets

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

10.1.4 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 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 14.4, 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

Alluvium	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 (eg peat).
Archaeological Priority Area/Zone	Areas of archaeological priority, significance, potential or other title, often designated by the local authority.
Brickearth	A fine-grained silt believed to have accumulated by a mixture of processes (eg wind, slope and freeze-thaw) mostly since the Last Glacial Maximum around 17,000BP.
B.P.	Before Present, conventionally taken to be 1950
Bronze Age	2,000–600 BC
Building recording	Recording of historic buildings (by a competent archaeological organisation) is undertaken 'to document buildings, or parts of buildings, which may be lost as a result of demolition, alteration or neglect', 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)
Built heritage	Upstanding structure of historic interest.
Colluvium	A natural deposit accumulated through the action of rainwash or gravity at the base of a slope.
Conservation area	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.
Cropmarks	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).
Cut-and-cover [trench]	Method of construction in which a trench is excavated down from existing ground level and which is subsequently covered over and/or backfilled.
Cut feature	Archaeological feature such as a pit, ditch or well, which has been cut into the then- existing ground surface.
Devensian	The most recent cold stage (glacial) of the Pleistocene. Spanning the period from $\it c$ 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.
Early medieval	AD 410–1066. Also referred to as the Saxon period.
Evaluation (archaeological)	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.
Excavation (archaeological)	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.
Findspot	Chance find/antiquarian discovery of artefact. The artefact has no known context, is either residual or indicates an area of archaeological activity.
Geotechnical	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.
Head	Weathered/soliflucted periglacial deposit (ie moved downslope through natural processes).
Heritage asset	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).
Historic environment assessment	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.
Historic Environment Record (HER)	Archaeological and built heritage database held and maintained by the County authority. Previously known as the Sites and Monuments Record
Holocene	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'.
Iron Age	600 BC-AD 43

Later medieval	AD 1066 – 1500
Last Glacial Maximum	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.
Locally listed building	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
Listed building	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).
Made Ground	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.
Mesolithic	12,000 – 4,000 BC
National Record for the Historic Environment (NHRE)	National database of archaeological sites, finds and events as maintained by Historic England in Swindon. Generally not as comprehensive as the country HER.
Neolithic	4,000 – 2,000 BC
Ordnance Datum (OD)	A vertical datum used by Ordnance Survey as the basis for deriving altitudes on maps.
Palaeo- environmental	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.
Palaeolithic	700,000–12,000 BC
Palaeochannel	A former/ancient watercourse
Peat	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.
Pleistocene	Geological period pre-dating the Holocene.
Post-medieval	AD 1500–present
Preservation by record	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.
Preservation in situ	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.
Registered Historic Parks and Gardens	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.
Residual	When used to describe archaeological artefacts, this means not <i>in situ</i> , ie Found outside the context in which it was originally deposited.
Roman	AD 43–410
Scheduled Monument	An ancient monument or archaeological deposits designated by the Secretary of State as a 'Scheduled Ancient Monument' and protected under the Ancient Monuments Act.
Site	The area of proposed development
Site codes	Unique identifying codes allocated to archaeological fieldwork sites, eg evaluation, excavation, or watching brief sites.
Study area	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.
Solifluction, Soliflucted	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.
Stratigraphy	A term used to define a sequence of visually distinct horizontal layers (strata), one above another, which form the material remains of past cultures.
Truncate	Partially or wholly remove. In archaeological terms remains may have been truncated by previous construction activity.
Watching brief (archaeological)	An archaeological watching brief is 'a formal programme of observation and investigation conducted during any operation carried out for non–archaeological reasons.'

# 13 Bibliography

### 13.1 Published and documentary sources

- Barton N, 1992. The Lost Rivers of London. Historical Publications.
- ClfA [Chartered Institute for Archaeologists] Dec 2014a, Standards and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment, Reading.
- ClfA [Chartered Institute for Archaeologists] Dec 2014b, Standards and guidance for historic environment desk-based assessment, Reading
- ClfA [Chartered Institute for Archaeologists] 2017, Standards and guidance for historic environment desk-based assessment, Published December 2014, updated January 2017, Reading
- Cowie, R, and Blackmore, L. 2008. Early and Middle Saxon rural settlement in the London region. MoLAS monograph 41. London: Museum of London Archaeology Service
- DCLG [Department of Communities and Local Government], March 2012 National Planning Policy Framework
- DCLG [Department of Communities and Local Government], March 2014 Conserving and Enhancing the Historic Environment: Planning Practice Guide
- Domesday Book, A Complete Translation, eds Williams, A. and Martin, G.H. 1992, 2002. London: Penguin Books
- EH [English Heritage], 2008 Conservation principles, policies and guidance (Swindon: English Heritage) GLA [Greater London Authority], March 2016 The London Plan. Spatial Development Strategy for Greater London. Consolidated with Alterations Since 2011
- GLAAS, 2015 *Guidelines for Archaeological Projects in Greater London*. Greater London Archaeological Advisory Service; Historic England, April 2015
- Hall, J 1996 The Cemeteries of Roman London: A Review. In Bird J, Hassall M, Sheldon H (eds) Interpreting Roman London. Papers in Memory of Hugh Chapman. Oxbow, Oxford, 57-84
- HE [Historic England] 2015a, *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning:* 3. Historic England in collaboration with the Historic Environment Forum, second edition, Historic England July 2015.
- HE [Historic England] 2015b Managing Significance in Decision-Taking in the Historic Environment Historic Environment Good Practice Advice in Planning: 2. Historic England in collaboration with the Historic Environment Forum, second edition, Historic England July 2015.
- HE [Historic England] 2017 Conservation Principles for the Sustainable Management of the Historic Environment, Consultation Draft, 10th November 2017

  <a href="https://content.historicengland.org.uk/content/docs/guidance/conservation-principles-consultation-draft.pdf">https://content.historicengland.org.uk/content/docs/guidance/conservation-principles-consultation-draft.pdf</a>
- Holmes, Basil (Mrs) 1896 The London Burial Grounds: Notes on their history from the earliest to the present day (1896). New York: MacMillan & Co
- Humphery-Smith C, 1984 The Phillimore Atlas and Index of Parish Registers.
- LeFaye D, 1980 Medieval Camden Camden History Society
- Lobel M, 1989 The City of London from prehistoric times to c 1520, Historic Towns Atlas 3, Oxford London Borough of Camden, Hatton Garden Conservation Area Appraisal and Management Strategy, August 2017
- London Topographical Society, 2005 The London County Council Bomb Damage Maps, 1939–1945. Margary ID, 1967 (revised edition) *Roman Roads in Britain*. London: John Baker Publishers Ltd
- MHCLG [Ministry of Housing, Communities and Local Government], 2019 National Planning Policy Framework, revised February 2019
- MoLAS [Museum of London Archaeology Service], 2000 The archaeology of Greater London: an assessment of archaeological evidence for human presence in the area covered by modern Greater London. London
- Museum of London, 2003 A research framework for London archaeology 2002, London Robey, A undated Panther House History. Unpub report
- Schofield J, 1984 The building of London from the Conquest to the Great Fire, London

Stow J, A Survey of London, Containing the Originall, Antiquity, Increase, Moderne Estate, and Description of that Citie, written in the year 1598. H Morley (ed) 1890. London: George Routledge and sons Ltd

Thompson A, Westman A, and Dyson T (eds), 1998 *Archaeology in Greater London 1965*–90: a guide to records of excavations by the Museum of London, MoL Archaeol Gazetteer Ser 2, London

Thornbury W, 1878 Old and New London: Volume 2

Weinreb B and Hibbert C (eds), 1995 The London encyclopaedia. Macmillan. London

Woolven R and Sauders A (eds), 2005 London County Council Bomb Damage Maps 1939-45. London Topographical Society

### 13.2 Other Sources

British Geological Survey online historic geology borehole data and digital drift and solid geology data Greater London Historic Environment Record

Historic England designation data

Internet – web-published sources

http://www.standrewholborn.org.uk/history/wren.html

http://www.workhouses.org.uk/Holborn/

Landmark historic Ordnance Survey mapping

Museum Of London Archaeological Archive

MOLA Deposit Survival Archive

# 13.3 Cartographic sources

Agas *c* 1562 'Civitas Londinum', reproduced in Margary, H, 1981 *A collection of early maps of London*, Margary in assoc Guildhall Library, Kent

Faithorne and Newcourt 1658 'An Exact Delineation of the Cities of London and Westminster and the suburbs thereof together with the Borough of Southwark', reproduced in Margary, H, 1981 *A collection of early maps of London,* Margary in assoc Guildhall Library, Kent

Goad, C E, 1886 Insurance plan of London, http://collage.cityoflondon.gov.uk/collage

Greenwood and Greenwood, 1827 'Map of London from an Actual Survey', reproduced in Margary 1982, 'Map of London from an Actual Survey' by C and J Greenwood, 1827, Margary in assoc Guildhall Library, Kent

Margary H, 1981 *A collection of early maps of London 1553–1667*, Margary in assoc Guildhall Library, Kent

Margary H, 1985 The A–Z of Regency London, Margary in assoc Guildhall Library, Kent

Morgan W, 1682 'London &c Actually Surveyed', reproduced in Margary, H, 1977 'London &c Actually Surveyed' by William Morgan, 1682, Margary in assoc Guildhall Library, Kent

Rocque, 1746 'A Plan of the Cities of London Westminster and Southwark with contiguous buildings from an actual survey' by John Rocque, reproduced in Margary, H, 1971 'A Plan of the Cities of London Westminster and Southwark' by John Rocque, 1746, Margary in assoc Guildhall Library, Kent

## Ordnance Survey maps

Ordnance Survey 1st edition 5ft:mile map (1872)

Ordnance Survey 2nd edition 5ft:mile map (1894–96)

Ordnance Survey 3rd edition 25":mile map (1916)

Ordnance Survey 1:1,250 scale map. (1955) (1967) (1974) (1980) (1992)

#### Engineering/Architects drawings

3D Services, dwg 15/040/07, rev A, 12/06/15

3D Services, dwg 15/040/06, rev B, 28/07/15

3D Services, dwg 15/040/13, rev A, 28/07/15

Veretec, dwg 21835-BZZ-LGF-07-100, Rev A, 12/08/2019

Veretec, dwg 21835-07-099, 12/07/2019

Veretec, dwg 21835-BZZ-LZZ-07-130, Rev A, 12/08/2019

# 13.4 Available site survey information checklist

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

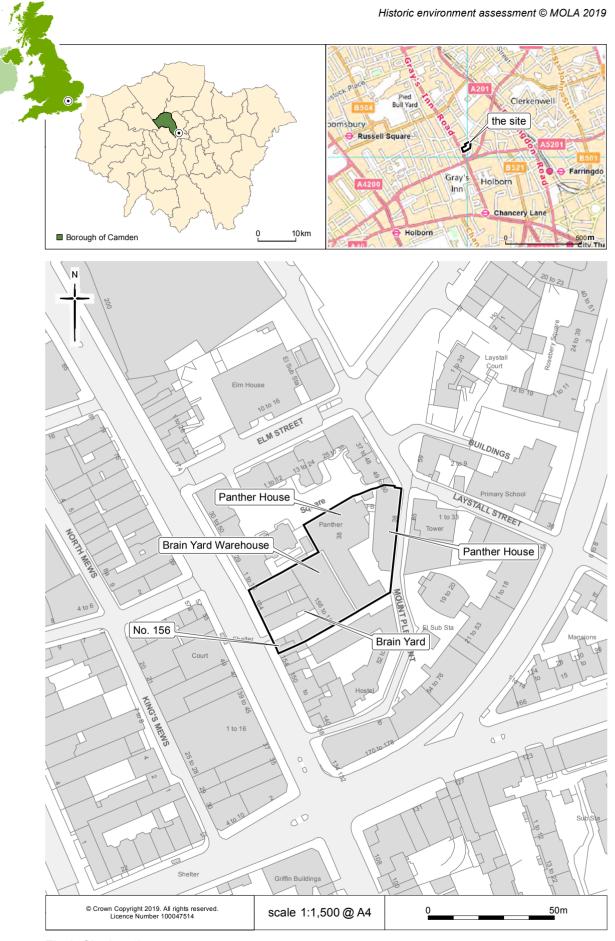


Fig 1 Site location

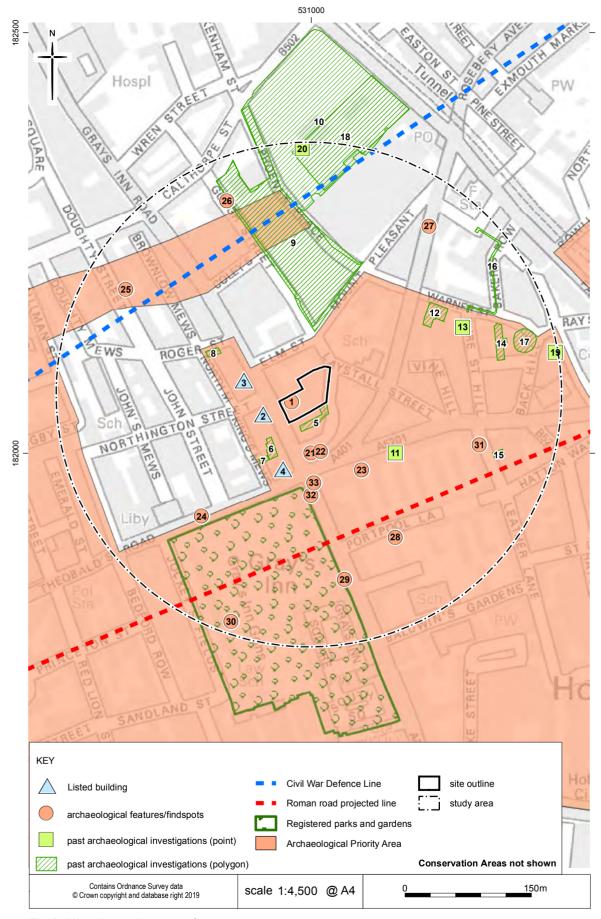


Fig 2 Historic environment features map



Fig 3 Location of geotechnical boreholes (Site Analytical Services 2015)

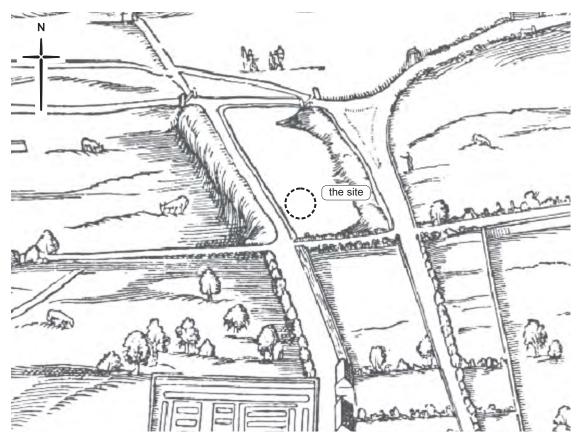


Fig 4 Agas's map of 1562

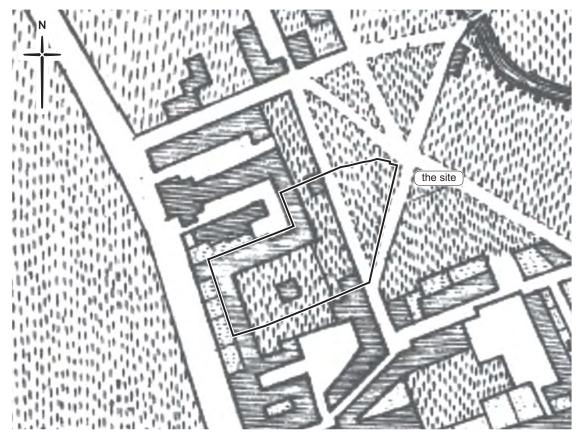


Fig 5 Morgan's map of 1682

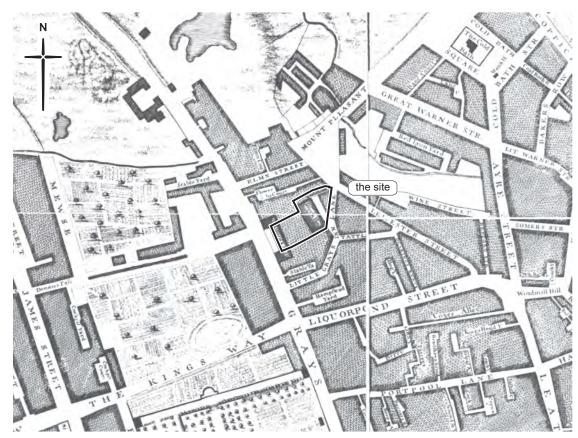


Fig 6 Rocque's map of 1746

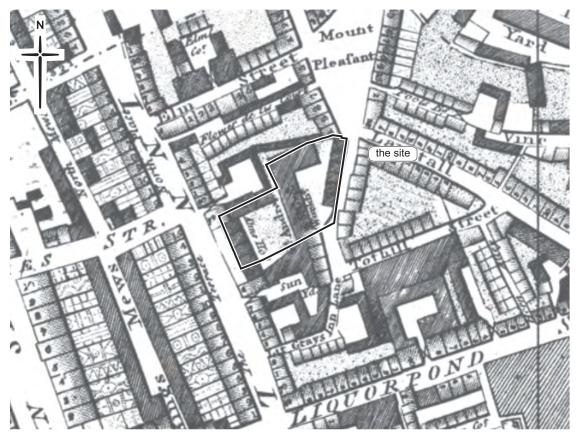


Fig 7 Faden's 1813 revision of Horwood's map of 1799

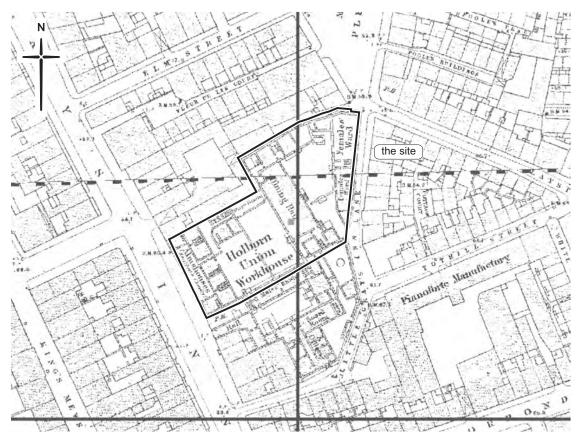


Fig 8 Ordnance Survey 1st edition 5ft:mile map of 1872 (not to scale)



Fig 9 Ordnance Survey 2nd edition 5ft:mile map of 1894–96 (not to scale)

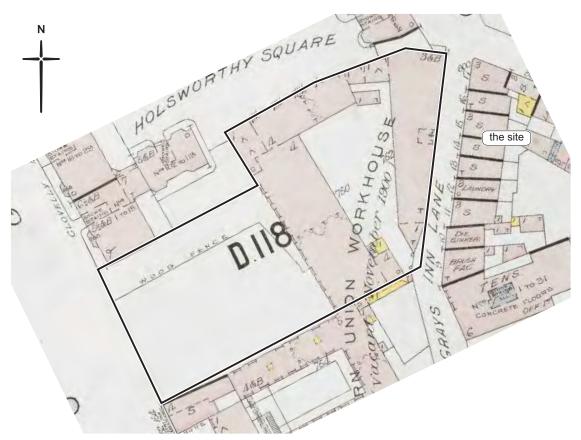


Fig 10 Goad Fire Insurance map of 1901 (© The British Library Board. Shelfmark Maps 145.b.23.(.d))

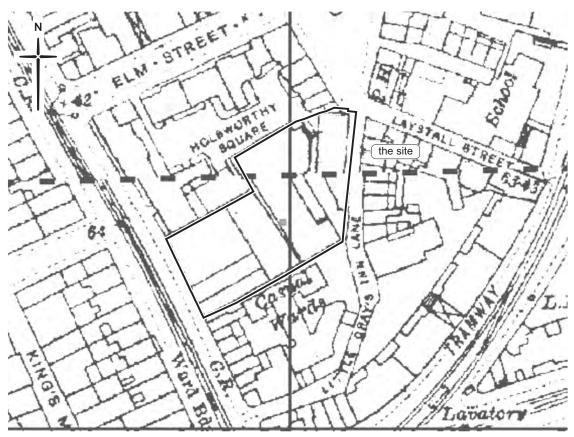


Fig 11 Ordnance Survey 3rd edition 25":mile map of 1916 (not to scale)

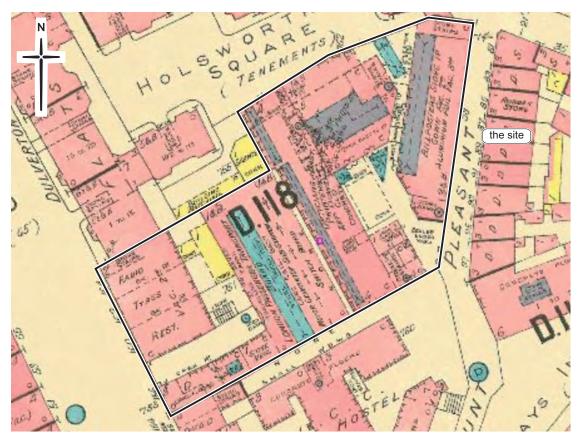


Fig 12 Goad Fire Insurance plan of 1942

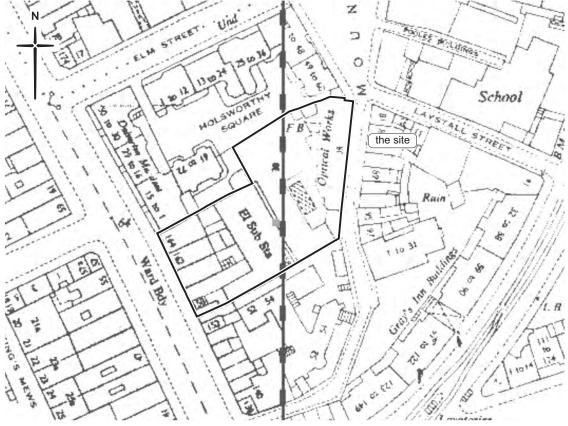


Fig 13 Ordnance Survey 1:2500 scale map of 1952 (not to sclae)



Fig 14 Existing ground floor plan (3D Services, dwg 15/040/07, rev A, 12/06/15)



Fig 15 Existing basement plan (3D Services, dwg 15/040/06, rev B, 28/07/15)

CAMD2014HEA19#15



Fig 16 Existing north-east to south-west section (3D Services, dwg 15/040/13, rev A, 28/07/15)

Fig 17 Proposed Ground Floor Plan (Veretec\_Drawing\_No.\_21835-BZZ-LGF-07-100, Rev A, 12/08/2019)

CAMD2014HEA19#17

Fig 18 Proposed Basement Floor Plan (Veretec\_Drawing\_No.\_21835-07-099\_12/07/2019)



Fig 19 Proposed north-east to south-west section (Veretec\_Drawing\_No.\_21835-BZZ-LZZ-07-130, Rev A, 12/08/2019)

CAMD2014HEA19#19