



Historic England

Ms Ben Farrant  
London Borough of Camden  
Town Hall,  
Camden Town Hall Extension,  
Argyle Street,  
Camden,  
London,  
WC1H 8ND

Your Ref: 2018/3833/P  
Our Ref: CLO27193  
  
Contact: Laura O’Gorman  
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HistoricEngland.org.uk

19 September 2019

Dear Mr Farrant,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2019**

**212 - 214 High Holborn London WC1V 7BW**

*Alterations and extensions to existing building including demolition at mezzanine and fourth floor levels; removal of modern additions at basement, ground, first, second, and third floor levels; construction of six storey rear extension above ground floor level; change of use from bank (Class A2) to retail (Class A1) at basement, ground and mezzanine levels and an uplift in office (Class B1) floorspace at upper levels including loss of 1 ancillary residential unit*

**Recommend Archaeological Condition(s)**

Thank you for your email dated 10 September 2019.

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

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

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



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

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

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

I am grateful to the applicant for providing further information relating to the proposed foundations. Given that the impacts will be small and localised I am satisfied that an archaeological watching brief during development will be sufficient to mitigate the archaeological impact. This should be carried out in accordance with an archaeological condition.

I therefore recommend the following condition on any consent:

- |             |  |
|-------------|--|
| Condition   | No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and<br>A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works<br>B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI |
| Informative | The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.   |

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this precommencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

The archaeological work should include:

#### Watching Brief



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

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

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

Yours sincerely



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



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