



Historic England

Ms Jonathan McClue
London Borough of Camden
Town Hall,
Camden Town Hall Extension,
Argyle Street,
Camden,
London,
WC1H 8ND

Your Ref: 2019/4478/P
Our Ref: CLO29802
Contact: Laura O’Gorman
Direct Dial: 0207 973 3242
Email: laura.o’gorman@
HistoricEngland.org.uk

19 September 2019

Dear Mr McClue,

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

**Panther House, 38 Mount Pleasant The Brain Yard, 156-158 Gray's Inn Road 160-164 Gray's Inn Road
London WC1X**

Redevelopment of the site to deliver approximately 6,642sq.m (GIA) of employment (B1) uses across Panther House, the Tramshed and two levels of Gray's Inn Road, approximately 229sq.m of A1/A3 uses at the ground floor level of Gray's Inn Road and 7 residential units (C3) equating to 949sq.m of GIA at the upper floors of the Gray's Inn Road building. The proposals include the 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 Gray's Inn Road and the construction of a new 7 storey building. Associated works include roof terraces at various levels of the building; plant equipment; cycle parking; landscaping works.

Recommend Archaeological Condition(s)

Thank you for your consultation dated 09 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

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation. We will always store your personal details securely. We collect data that you provide to us and only ever collect the information we need in order to carry out our statutory purposes and that helps us deliver and improve our services. We will only share personal data when we are required to by law or with carefully selected partners who work for us. If you would like to know more or understand your data protection rights, please take a look at our Privacy and Cookies Policy <http://www.historicengland.org.uk/terms/privacy-cookies/>. Historic England is committed to achieving equality of opportunity as a service provider and employer.



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

The submitted archaeological assessment indicate that the primary potential is for remains associated with the mid-18th century and later Holborn Union Workhouse, parts of which are still extant and are designated as a locally listed building as a result of its historical evidence. The site also lies close to the line of a Roman road, meaning that there is some potential for remains of Roman roadside activity. The archaeological impact would arise from the construction of the new 7 storey building that will replace 156 and 160-164 Grays Inn Road. I therefore recommend a programme of archaeological investigation in accordance with a planning condition. The initial stage will be for an evaluation which would aim to inform the scope for any further archaeological mitigation.

I therefore recommend attaching a condition as follows:

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

I envisage that the archaeological fieldwork would comprise the following:



Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3000
www.historicengland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation. We will always store your personal details securely. We collect data that you provide to us and only ever collect the information we need in order to carry out our statutory purposes and that helps us deliver and improve our services. We will only share personal data when we are required to by law or with carefully selected partners who work for us. If you would like to know more or understand your data protection rights, please take a look at our Privacy and Cookies Policy <http://www.historicengland.org.uk/terms/privacy-cookies/>. Historic England is committed to achieving equality of opportunity as a service provider and employer.



Evaluation

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

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

electronic electronic electronic electronic
electronic electronic electronic electronic
electronic electronic electronic electronic



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



Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3000
www.historicengland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation. We will always store your personal details securely. We collect data that you provide to us and only ever collect the information we need in order to carry out our statutory purposes and that helps us deliver and improve our services. We will only share personal data when we are required to by law or with carefully selected partners who work for us. If you would like to know more or understand your data protection rights, please take a look at our Privacy and Cookies Policy <http://www.historicengland.org.uk/terms/privacy-cookies/>. Historic England is committed to achieving equality of opportunity as a service provider and employer.

