



**20–23 GREVILLE STREET
London EC1N 8SS**

London Borough of Camden

Archaeological report

January 2018



**20–23 Greville Street
London EC1N 8SS**

Archaeological report

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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

Seaforth Land has commissioned MOLA to carry out a historic environment assessment in advance of proposed development at 20–23 Greville Street in the London Borough of Camden. The scheme comprises the change of use of existing Class B1 at ground floor, basement and first floor levels to Class A1/A3 use; demolition of existing fifth floor plant room and construction of rooftop extension at fifth and mezzanine floor level for Class B1 use, rear infill extension to all floors for Class B1 use, external alterations including new façade and glazing, and associated works.

The rear extension would be supported by piled foundations at the edge of the site, and / or a raft foundation at the lower ground floor level. The existing lower ground floor or basement would not be lowered or extended. A new lift pit is proposed in the west of the site, which would incorporate a new passenger lift running from the lower ground floor to first floors.

This desk-based study assesses the impact on buried heritage assets (archaeological remains). Although above ground heritage assets (historic structures) are not discussed in detail, 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.** The site underwent several phases of post-medieval suburban development from the early 18th century onwards. Within the unbasemented south-west of the site there is potential for structural remains of 18th and 19th century buildings, including foundations and footings, whilst within the footprint of the existing lower ground floor there is potential for only the bases of cut features such as cellar walls or deep foundations, rubbish and cess pits, wells and drains, all of which would be of low significance.
- **Possible later medieval remains.** The site was located in the vicinity of the 14th century Ely Place, the London residence for the Bishops of Ely to the south of the site. The site itself was probably along the southern side of the boundary wall between the garden of the Bishops' palace to the north and open ground within the palace complex to the south. Any remains of the boundary wall, such as wall footings, would be of low or medium significance, whilst any remains of cut features, such as pits, ditches or wells, would be of low significance.

The site has a low potential to contain remains from earlier periods. No evidence for prehistoric activity has been found in the vicinity of the site, likely due to the removal of such evidence by later urban development. The site was located away from known Roman roads and Saxon settlements of Holborn and Lundenwic, probably within woodland or fields on the bank of the River Fleet.

Archaeological survival within the site is likely to be high in the south-west, outside the footprint of the existing lower ground floor. Within the footprint of the existing lower ground floor, the survival potential is likely to be low in the eastern part of the site and very low in the western part of the site.

Breaking-out the existing hardstanding in the south-west of the site would potentially have an effect, truncating or removing entirely any archaeological remains directly beneath. New piled foundations in the south-west of the site would completely remove all archaeological remains within their footprint, but due to the relatively light density would have a localised effect. Any raft foundations would remove any archaeological remains within the footprint of the slab to its formation level, but it is possible that in the unbasemented south-western part of the site, the bases of deep cut archaeological features would remain intact beneath these impact levels, but their context could be lost. The excavation for the new lift pit in the west of the site would remove any archaeological remains within the pit footprint. Any excavation of new service trenches and drains would remove any archaeological remains within the trench footprint.

Although the site is located within Camden's London Suburbs Archaeological Priority Area, in view of the limited archaeological potential and the relatively small and localised area of proposed impact, it is unlikely that the local authority would require preliminary archaeological field evaluation of the site prior to the determination of planning consent. The archaeological monitoring of any geotechnical investigations may, however, help to determine the current extent and depth of truncation. Once the foundation design has been refined and the scale of ground disturbance is known, an appropriate strategy for further archaeological investigation and / or mitigation could be drawn up to ensure that any archaeological assets were not removed without record. Any archaeological work would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and could be

carried out under the terms of a standard archaeological planning condition set out with the granting of planning consent.

1 Introduction

1.1 Origin and scope of the report

- 1.1.1 Seaforth Land has commissioned MOLA (Museum of London Archaeology) to carry out a historic environment assessment in advance of proposed development at 20–23 Greville Street in the London Borough of Camden, EC1N 8SS; National Grid Reference (NGR) 531464 181755: Fig 1. The scheme comprises the change of use of existing Class B1 at ground floor, basement and first floor levels to Class A1/A3 use; demolition of existing fifth floor plant room and construction of rooftop extension at fifth and mezzanine floor level for Class B1 use, rear infill extension to all floors for Class B1 use, external alterations including new façade and glazing, and associated works.
- 1.1.2 The rear extension would be supported by piled foundations at the edge of the site, and / or a raft foundation at the lower ground floor level. The existing lower ground floor or basement would not be lowered or extended. A new lift pit is proposed in the west of the site, which would incorporate a new passenger lift running from the lower ground floor to first floors.
- 1.1.3 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.
- 1.1.4 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 (i.e., 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 assets arising from the development proposals are noted. The report does not assess issues in relation to the setting of above ground assets (e.g. visible changes to historic character and views).
- 1.1.5 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG 2012, 2014; see section 10 of this report) and to standards specified by the Chartered Institute for Archaeologists (CIfA Dec 2014a, 2014b), Historic England (EH 2008, HE 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.
- 1.1.6 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. The site is 30m north-west of a Grade II listed workshop building from 1873–4, and 50m west of the Grade II listed St Andrew’s House from 1875, the oldest surviving public housing in London.
- 1.2.2 The site is within the Hatton Garden Conservation Area, as defined by the London Borough of Camden, and is characterised by a network of small streets, a variety of high quality buildings which are not dominated by a particular character, style or function but rather by a combination of styles and uses (LBC 1999).

- 1.2.3 The site is within London Suburbs Archaeological Priority Area, likely to have been defined as such by the London Borough of Camden for its proximity to the medieval City of London and potential for archaeological evidence of early post-medieval suburban expansion.
- 1.2.4 GLAAS is currently re-assessing APAs throughout the London boroughs in line with new guidelines to link archaeological sensitivity tiers to specific thresholds for triggering archaeological advice and assessment. The London Borough of Camden's APAs are due to be reviewed in 2018 (historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/).

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. This information 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 160m-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 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, along with identified Heritage at Risk;
- The London Society Library – published histories and journals;
- Camden Local Studies and Archives Centre – historic maps and published histories;
- Groundsure – historic Ordnance Survey maps from the first edition (1860–70s) to the present day, and Goad insurance maps;
- British Geological Survey (BGS) – solid and drift geology digital map; online BGS geological borehole record data;
- Seaforth Land – architectural drawings (Groupwork/ December 2017);
- Internet – web-published material including the LPA local plan, and information on conservation areas and locally listed buildings.

2.1.4 The assessment included a site visit carried out on the 3rd of November 2017 in order to determine the topography of the site and the nature of the existing building on the site, and to provide further information on areas of possible past ground disturbance and general historic environment potential. Observations made on the site visit have been incorporated into this report.

2.2 Methodology

2.2.1 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 50m) 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).

- 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.

2.3 Assumptions and limitations

- 2.3.1 No geotechnical works have been carried out on the site and therefore information about the geology within the site has been drawn from BGS historic borehole records in the vicinity of the site (sections 3.2 and 3.3).
- 2.3.2 The floor levels of the existing building within the site, particularly the lower ground floor level, were not known at the time of writing. Therefore, the assessment of modern impacts affecting archaeology (section 3.4) is based on estimations made during the site visit (MOLA site visit 03/11/2017).

3 The site: topography, geology and modern impacts

3.1 Site location

- 3.1.1 The site is located at 20–23 Greville Street in the London Borough of Camden, EC1N 8SS, 180m south-west of Farringdon Railway Station (NGR 531464 181755: Fig 1). The site area is 0.1ha and is bounded by Greville Street to the north, 24 Greville Street to the east, 1 Bleeding Heart Yard to the south, and Bleeding Heart Yard to the south and west. The site falls within the historic Liberty of Saffron Hill, a civil parish between 1866 and 1930, previously a part of the ancient parish of St Andrew Holborn. It was within the county of Middlesex prior to being absorbed into the administration of the Greater London Borough of Camden.
- 3.1.2 The site is 70m west of the River Fleet, now culverted underground, which ran along the course of Farringdon Road, and 920m north of the modern bank of the River Thames.

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 general topography of the study area slopes down from the north and west to the south and east towards the River Fleet and the River Thames. Street level on Leather Lane, 180m to the west of the site, is at 19.6m Ordnance Datum (OD). There is a gradual slope along Greville Street down towards the east to 16.5m OD, 10m north-west of the site, with a sharper slope further down to the east, into the Fleet valley, to 11.5m OD at Farringdon Road, 70m east of the site. A BGS borehole, in association with Crossrail, at Bleeding Heart Yard, 5m south of the site (BGS ref. TQ38SW3618, Crossrail ref. RT46), recorded the existing ground level at 15.0m OD (Crossrail 2009, dwg. no. C136-SWN-C2-DDL-M123_Z-00004, rev. P01, date, 14/10/2009).
- 3.2.3 The ground levels within the site have probably been built up and are sloping from **19.6m OD** in the south-west of the site down to **17.8m OD** immediately north-east of the site (Lane and Frankham, dwg. no. LF-1316-UGS, rev. 001, date November 2017; Fig 13).

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 geology of the site comprises river terrace gravels of the Hackney Gravel formation, overlying London Clay. The River Fleet lay 70m to the east of the site along Farringdon Road. British Geological Survey (BGS) digital mapping indicates the presence of alluvial deposits at the base of the valley 40m east of the site, and exposed London Clay on the western bank River Fleet (where the overlying Gravels have been scoured out by past fluvial action) extending across the area of Saffron Hill and extending 10m westwards into the site, with the Hackney Gravel covering rest of the site.
- 3.3.3 No geotechnical investigations have been carried out within the site. A BGS borehole, which was drilled in association with Crossrail, 5m south of the site (BGS ref. TQ38SW3618, Crossrail ref. RT46), recorded a 2.3m thick layer of made ground (comprising 0.3m modern made ground and 2m undated made ground) truncating London Clay at 13.2m OD (2.3m below ground level/bgl) (Crossrail 2009, dwg. no. C136-SWN-C2-DDL-M123_Z-00004, rev. P01, date, 14/10/2009).
- 3.3.4 Another BGS borehole 50m north-east of the site (BGS ref. TQ38SW1190) recorded London Clay at 11.7m OD (1.1mbgl) overlain by 0.8m of undated made ground under 0.3m of concrete. BGS TQ38SW1188/A 50m east of the site, recorded 0.6m of undated made ground beneath 0.6m of concrete, overlying alluvium at 7.6m OD and London Clay at 4.3m OD, whilst BGS TQ38SW1188/B, 50m to the east of the site, recorded up to 4.7m of undated made

ground striking London Clay at 4.1m OD. The levels of the London Clay in these boreholes confirm the general slope of the London Clay down towards the Fleet valley to the east of the site.

3.3.5 An archaeological watching brief at 1–2 Kirby Street and 29-31 Greville Street, 30m north-west of the site (**HEA 3**), recorded London Clay at 13.2m OD (1.5m below basement slab level; MoLAS 2006). Overlying the Clay in some places was a gravel deposit at 14.4m OD immediately below the basement slab (2.1mbgl), although it is uncertain whether this was natural gravel, as the deposits, where present, were described as ‘possibly reworked’ (MoLAS 2006). An archaeological evaluation at 6–10 Kirby Street and 119–124 Saffron Hill, 50m north-west of the site (**HEA 4**), recorded in evaluation pit 2 (EP 2) on the east side of the site terrace gravels at 12.9m OD directly below the 0.5m thick basement slab overlying London Clay at 12.2m OD (1.2m below the top of the basement slab). In evaluation pit 3 (EP 3), in the south of the site London Clay recorded at 13.1m OD directly below a 0.2m thick partial basement slab. A later archaeological watching brief at this location (**HEA 4**) recorded natural truncated gravels at 12.5m OD (4.0mbgl), overlying London Clay at 10.8m OD (5.7mbgl).

3.3.6 The results of the BGS boreholes and the archaeological investigations described above are outlined in Table 1, which differentiates between modern made ground (containing identifiably modern inclusions such as concrete and plastic), and undated made ground, which may potentially contain deposits of archaeological interest. This differentiation was not apparent in the original BGS reports as they were commissioned for engineering purposes. In all likelihood, the undated made ground comprises post-medieval remains.

Table 1: summary of geotechnical data from BGS boreholes and the information from archaeological investigations in the vicinity (BGS refs.TQ38SW1188/A and TQ38SW1190; MoLAS 2000b; MoLAS 2006)

Levels are in metres below ground level (mbgl)

BGS BH/HEA ref.	Modern made ground	Thickness of undated made ground	Top of natural alluvium	Top of natural Gravel	Top of London Clay
TQ38SW3618/RT46	<0.3	2	–	–	2.3
TQ38SW1190	<0.3	0.8	–	–	1.1
TQ38SW1188/A	<0.6	0.6	1.2	–	4.6
TQ38SW1188/B	<0.3	0.3	–	–	4.7
HEA 3	<2.1	2.6	–	–	3.3
HEA 4 evaluation (EP 2)	<3.6	–	–	3.6	4.3
HEA 4 evaluation (EP 3)	<3.4	–	–	–	3.4
HEA 4 Watching brief	<4.0	–	–	4.0	5.7

3.3.7 Based on this information, and the ground levels of 17.8–19.6m OD, the natural London Clay deposits within the site may be found between 15.5m and 18.5m OD (1.1–2.3mbgl). The London Clay is likely to slope down towards the Fleet valley further east of the site, as indicated by the above information, which would suggest that the top of clay may be found at a deeper level in the eastern part of the site. Any natural gravels, if present, might be found between the natural clay and made ground.

3.4 Modern impacts affecting archaeological survival

3.4.1 The main modern impact on archaeological survival within the site is the existing lower ground floor of the late 20th century building within the site. The lower ground floor covers 80% of the site, apart from the south-western corner where the current car park is at ground floor level (Groupwork, dwg. no. 248–100, rev. A, date 26/04/2017; Fig 13 and Fig 15). The floor level of the existing lower ground floor is not known (see section 2.3), but based on observations and

measurements taken during the site visit (MOLA site visit 03/11/2017) it is estimated that the floor level is at 1m below ground level/bgl (16.8m OD) in the east of the site, where the ground floor is built up 1.8m above the street level of 17.8m OD and the natural slope in the east of the site to meet the street level to the west of the site at 19.6m OD (Fig 13), and at 2.8mbgl (16.8m OD) in the west of the site, within the higher part of the slope where the ground floor level meets the street level (Fig 13). Taking into account an assumed slab thickness of 0.4m, the estimated formation level of the lower ground floor would be at 16.4m OD (1.4–3.2mbgl).

- 3.4.2 In the west of the site, at the higher level of the slope, where the top of London Clay is likely to be higher (18.5m OD), the lower ground floor will have removed any undated made ground and natural gravels and extended into the natural clay, removing any archaeological remains, possibly apart from the bases of deeply cut features, such as wells. In the eastern part of the site, at the lower level of the slope, where the top of London Clay is likely to be deeper (15.5m OD), this will likely have removed any natural gravels and extended into the undated made ground, truncating and removing any archaeological remains. It is possible that this will not have reached the deeper level of the natural clay in this area and archaeological remains might therefore survive within the lower part of the made ground, at the interface with the top of and cut into the London Clay.
- 3.4.3 Any archaeological remains beneath the slab formation level are likely to have been entirely removed locally within the footprint of existing foundations. The existing lift pit in the east of the site, which extends down to the lower ground floor level (Groupwork, dwg. no. 248–100, rev. A, date 26/04/2017; Fig 15), will have extended into the London Clay and entirely removed any archaeological remains to a depth of 1.5m below the foundation slab formation level within the lift pit footprint.
- 3.4.4 In 2013–14 a westbound and eastbound Crossrail tunnels were constructed to the south and north of the site, respectively. The depth to the Tunnel Protection Zone is approximately 15–20mbgl (Atelier One 2017; Crossrail 2016; crossrail.co.uk). Due to the great depth, this will not have affected any archaeological remains, which would be found further above this level, within the undated made ground and cut into the top of London Clay at 1.8–3.8mbgl.

4 Archaeological and historical background

4.1 Overview of past investigations

- 4.1.1 No archaeological investigations have been carried out within the site. Within the study area, there have been 15 archaeological investigations, which mainly comprised evaluations and watching briefs, with only two excavations (**HEA 6** and **9**). The investigations are generally distributed well across the study area, apart from the central western part which lacks any archaeological investigation. Consequently the archaeology of the area is fairly well understood.
- 4.1.2 The nearest archaeological watching brief at 1–2 Kirby Street, 29-31 Greville Street, 30m north-west of the site (**HEA 3**) recorded no archaeological deposits and only natural deposits. The majority of investigations within the study area recorded remains dating to the post-medieval period including building remains (**HEA 4, 5, 12, 13, 14**) and evidence for quarrying in the early post-medieval period (**HEA 5**). Human remain dating to the post medieval period have also been recorded (**HEA 4, 8, 12**), but not in the vicinity of the site. Building remains dating to the later medieval period, including some associated with the London residence of the Bishop of Ely, have been recorded during four investigations (**HEA 5, 8, 9, 10**). Two investigations have recorded Roman remains (**HEA 8** and **17**), including one Roman cremation urn (**HEA 17**).
- 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 Britain first 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 According to the MOLA GIS prehistoric key indicator data, two further Palaeolithic handaxes were found by chance outside the study area, one 530m north-west of the site (National Record for the Historic Environment (NRHE) ref 1134193) and another 960m north-west of the site (NRHE ref 1135152).
- 4.2.3 The Mesolithic hunter-gather communities of the postglacial period (10,000–4000 BC) inhabited a still largely wooded environment. The river valleys would have been favoured in providing a dependable 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.
- 4.2.4 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. No finds of these periods have been recorded in the study area. According to the MOLA GIS prehistoric key indicator data, an archaeological investigation outside the study area at 8–13 Clerkenwell Close, 33–36 Clerkenwell Green, 390m north of the site (site code ENG84), recorded an Iron Age pit and ditch cut into the natural gravels.
- 4.2.5 The broader landscape of central London has a concentration of evidence of early settlement on the Gravels 1.5km south-west and 1.3km south-east of the site along the Thames valley.

The site was located on the edge of a Gravel ridge, close to the resources of the Fleet River, 70m to the east of the site, which would have been a favourable area for early settlement. However, there is limited evidence of prehistoric activity in the vicinity of the site which may either be due to the removal of much of the prehistoric material by post-medieval development or that it simply wasn't settled.

Roman period (AD 43–410)

- 4.2.6 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, 500m to the south-east of the site. It quickly rose to prominence, becoming a major commercial centre and the hub of the Roman road system in Britain. Small settlements, typically located along the major roads, supplied produce to the urban population, and were markets for *Londinium's* traded and manufactured goods (MoLAS 2000a, 150).
- 4.2.7 High Holborn, which runs 200m south of the site, follows the approximate line of the Roman Silchester Road, which was the main route between London and west Britain, entering the city at Newgate (Margary 1967, 57; Fig 2).
- 4.2.8 Roman law prohibited the burial of the dead within towns and this led to cemeteries being sited alongside the main routes into and out of towns. One of the three main cemetery areas was outside Newgate, 510m to the south-east of the site. Burials previously found along High Holborn have been assumed to be part of a spread westwards from the Newgate cemetery. Within the study area a Roman cremation was recorded during an archaeological watching brief at Shoe Lane, 150m south-east of the site (**HEA 17**). Just outside the study area, archaeological excavations at Atlantic House, 180m south-east of the site (site codes ATL89 and ATC97), recorded evidence of a Roman cemetery, including 19 inhumation burials and 29 deposits of cremated human bone (MoLAS 2003,xi). It is unlikely that the Roman cemetery extended as far as the site. Other Roman remains recorded within the study area include a possible Roman ditch recorded during an archaeological watching brief at Ely Place, 100m to the south of the site (**HEA 8**).
- 4.2.9 During this period it is likely the site was located within farmland or woodland by the Fleet River, further to the north of the cemetery along High Holborn.

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

- 4.2.10 Following the withdrawal of the Roman army from England in the early 5th century AD, *Londinium* was apparently abandoned. Germanic ('Saxon') settlers arrived from mainland Europe, with occupation in the form of small villages and an economy initially based on agriculture. By the end of the 6th century a number of Anglo-Saxon kingdoms had emerged, and as the ruling families adopted Christianity, endowments of land were made to the church. Landed estates (manors) can be identified from the 7th century onwards; some, as Christianity was widely adopted, with a main 'minster' church and other subsidiary churches or chapels. 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 settlements served by a parish church.
- 4.2.11 The main Saxon settlement of *Lundenwic* was a busy trading port which developed and flourished for 200 years (7th–9th centuries) and was focussed on the Thames foreshore south of the Strand and modern Covent Garden, 900m south-west of the site; its full extent is not yet clear (MoLAS 2000a, 182–3). *Lundenwic* began to decline in the 9th century and was probably abandoned following Viking attacks AD 850–70. In these more troubled times the original city was refortified within its Roman walls by King Alfred, and by AD 889 the core settlement had returned there as *Lundenburh* (Vince 1990, 46). This formed the basis of the medieval and later City of London. By the 10th century, the whole area north of the Strand and south of Holborn had become part of the Westminster Abbey estates.
- 4.2.12 The parish church of St Andrew beside modern Holborn Circus, 230m south 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'. Both these references suggest a mid Saxon origin for the church which adjoined the still-used Roman road, where it crossed the River Fleet (Schofield 1984, 32; Weinreb *et al* 2008, 741).
- 4.2.13 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. The derivation of the Fleet

River's present name might derive from the Saxon *flēot*, meaning a tidal inlet or estuary (Barton and Myers 2016, 39; Weinreb *et al* 2008, 405). The GLHER includes the location of the medieval village, which may have existed by this period, on the eastern edge of the parish at the junction of modern Farringdon Road and Charterhouse Street, 140m south-east of the site (**HEA 19**).

- 4.2.14 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. *Holeburne* is recorded in Domesday Book (AD 1086), 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 *et al* 2008, 78). The area appears to have been a mixture of pasture, cultivated land and woodland, probably supplying produce to the City.
- 4.2.15 Throughout this period, the site was located some distance from the settlements of *Lundenwic* and later *Lundenburh*. No Saxon remains have been found within the study area. It is therefore probable that the site lay within possible marshland or a meadow on the banks of the Fleet River.

Later medieval period (AD 1066–1485)

- 4.2.16 At the end of the 12th century, the writer William FitzStephen recorded that the area north of the medieval City of London 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).
- 4.2.17 In contrast, the banks of the River Fleet, 70m east of the site, became a focus for 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, 416–26). 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 *et al* 2008, 298). A tile kiln, possibly of medieval date is included in the GLHER, also situated on the west bank of the Fleet, 150m north-east of the site (**HEA 23**).
- 4.2.18 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, 700m north-west of the site, which was fed by nearby springs. As well as Holborn, the GLHER notes that Farringdon Road, 60m east of the site (**HEA 20**), is likely to have been in existence by this period.
- 4.2.19 The site was located in the vicinity of Ely Place, built in the early 14th century as a residence for the Bishops of Ely c 80m south-west of the site. The site itself was probably located along a boundary wall between the grounds attached to the palace and the extensive parkland to the north, as shown on the 16th and 17th century maps (Fig 3–Fig 5). The large estate was bounded by Saffron Hill, 40m east of the site, and Leather Lane, 170m west of the site.
- 4.2.20 The only surviving building associated with the Palace is St Etheldreda's Church, 50m to the south-west of the site. The Palace had its origins with John de Kirkeby, Bishop of Ely, who died in 1290, leaving to his successors a messuage (dwelling house, outbuilding and land directly associated to it) and nine cottages in Holborn, probably situated between the site and Holborn. The following bishop, William de Luda, (1290 to 1298) donated more land and St Etheldreda's Church was built by 1303. The house itself was built by 1320 and lay to the south and south-east of the chapel. In 1336, Bishop John de Hotham added six messuages, two cellars and forty acres of land and established a vineyard, kitchen garden and orchard. In the late 14th century Bishop Thomas Arundel extended the house, building the cloisters and a gatehouse towards Holborn (www.stetheldreda.com; Thornbury 1878, 514–526).
- 4.2.21 Archaeological investigations carried out within the church grounds and clergy house in 1983, 90m south-west of the site (**HEA 10**), and in 1985, 120m south-west of the site (**HEA 9**) recorded remains associated with the crypt. In 1990, a watching brief during works at 31–34 Ely Place, 110m south of the site (**HEA 8**), recorded remains associated with the hall and east range of the palace. The GLHER notes a chance find, 130m north-east of the site (**HEA 21**), of

a 14th century iron crossbow-bolthead of unusual design, thought to be an incendiary weapon, found in excavations for the tube at Holborn in 1869.

- 4.2.22 Throughout this period it is likely that the site was within open ground associated with Ely Palace and remained basically undeveloped. Later 16th and 17th century maps (see Figs 3 and 4) indicate that a boundary wall between the palace garden, later a park, to the north, and open ground within the palace complex to the south might have later formed the south side of Greville Street. If so, it is possible that the site is on the line of this boundary wall

Post-medieval period (AD 1485–present)

- 4.2.23 The earliest map consulted, the 'Agas' map of 1562 (Fig 3) is a pictorial map that shows 'Ely Place' fronting onto Holborn, with a central courtyard and what is possibly the chapel to the north of this. A kitchen garden is laid out to the west and south-west of the site while an enclosed yard or field is within and to the south of the site. To the north of this is parkland or meadow, enclosed by a wall and accessed via a gatehouse. It is probable that Greville Street was laid out along the line of this wall, which would locate the site primarily in the enclosed yard or field directly to the south of the wall, and in the vicinity of a gateway to the north-west of the site. Two large buildings are shown in the north-west corner of the field, possibly representing a gatehouse and associated stable or similarly functioned building. The bishops used this building themselves until 1576, when they leased part to Sir Christopher Hatton who built Hatton House within the grounds, on the orchard to the west of the site (Weinreb *et al* 2008, 271, 389).
- 4.2.24 During the Civil War (1642–1651) Ely Palace was used a prison and a hospital (Thornbury 1878, 514–526); during archaeological investigations at Ely Place in 1989–90, 110m south of the site (**HEA 8**), two human burials thought to date to this period were recorded. Disarticulated human remains possibly dating to the same period have been recorded during archaeological investigations at 6–10 Kirby Street, 119–124 Saffron Hill, 50m north of the site (**HEA 4**), and at 11–14 Kirby Street, 80m north-west of the site (**HEA 12**); these may have been brought in from elsewhere during dumping or levelling as no church existed in the vicinity according to the historic maps (MoLAS 1999, MoLAS 2000b).
- 4.2.25 In 1659, Evelyn noted in his diary 'To Lond... to see the foundations now laying for a longe streete, and buildings in Hatton Garden, designed for a little Towne; lately an ample Garden.' (Weinreb *et al* 2008, 271, 388). Faithorne and Newcourt's map of 1658 (Fig 4) still shows the gatehouse on Holborn leading into the central courtyard. The kitchen garden and walled yard or field to the west and south-west of the site have been entirely built over, and an alley was constructed leading to Ely Palace from a courtyard. These buildings are probably those of Hatton House, built by Sir Christopher Hatton in the 16th century. The meadow to the north has been turned into a formal garden, still surrounded by a wall, with a gatehouse and again probably associated with Hatton House. The site itself possibly remained on the line of the boundary wall and within the open ground within the palace complex, which might have later formed the southern side of Greville Street.
- 4.2.26 Lord Christopher Hatton, grandson of Sir Christopher, inherited the estate but found himself in financial difficulties. After trying unsuccessfully to lease the estate, he set about demolishing Hatton House and laying out streets in the gardens for a property development scheme (www.stethelredas.com). John Evelyn, the diarist, wrote for the 7th June 1659 'To Lond[on]...to see the foundations now laying for a long streete, and buildings in Hatton Garden, designed for a little towne, lately an ample garden' (Evelyn, cited by Weinreb *et al* 2008, 388).
- 4.2.27 Ogilby and Morgan's map of 1676 (Fig 5) shows the newly completed Hatton Garden running north-south (the den of Garden can be seen in the south-west corner of Fig 5), parallel with Leather Lane, 100m west of the site (not shown), and to the west of 'Ely House', formerly Ely Palace (not shown), 80m south-west of the site. 'Charles Street', later Greville Street, crosses Hatton Garden along the approximate line of the earlier southern wall and gatehouse of the formal garden forming the northern boundary of the site. Terraced buildings are shown lining it on both sides. The former garden to the north of the site had been redeveloped as well, with Kirby Street now running north from Greville Street, 40m north-west of the site, also with new terraced building lining both sides. The site itself is shown within a cleared, open area, ready for development. Morgan's map of 1682 (not reproduced) shows that the site remained unchanged.

- 4.2.28 St Andrew's Holborn Parish map of c 1720 (not reproduced) is not a detailed map and shows built up areas with indicative shading rather than individual buildings. It shows the site as comprising buildings fronting Charles Street to the north and backyards to the south. Rocque's map of 1746 (Fig 6) is similarly not a detailed map and does not show the yards to the rear. Both maps show the 'Bishop of Ely's' house 140m south/south-east of the site. However, Rocque's shows Bleeding Heart Yard immediately south and south-west of the site and refers to a chapel attached to Ely Palace. The Bleeding Heart Yard forms part of the original courtyard of Hatton House (Weinreb *et al* 2008, 75).
- 4.2.29 In 1772, on the death of the last Lord Hatton, the property reverted to the Crown. Ely House had by then become extremely dilapidated and all but St Ethelreda's Church, 50m south-west of the site, were demolished. Brick terraced houses were then built on 'Ely Place' (Weinreb *et al* 2008, 271).
- 4.2.30 Faden's 1813 revision of Horwood's map of 1799 (Fig 7) shows the individual buildings in more detail and reflects both the 1720 parish map and Rocque's. The map makes it clear that the northern half of the site was comprised of terraced houses; however, only three have yards. A non-residential building (shown by dark hatching on Faden's 1813 map, possibly workshops or stables) is to the rear of the two western-most terraced houses. Within the wider area it development within the open area of Ely Place 80m south of the site. Greenwood's map of 1827 (not reproduced), which only shows built up areas without further detail shows that the site remained unchanged.
- 4.2.31 Whilst Hatton Garden was considered suitable for the well-to-do, by the early 19th century much of the surrounding area was very run down and the home to many poor families, in particular along Saffron Hill (LBC 1999). These criminalised slums ('rookeries') are depicted in Charles Dickens's *Oliver Twist*.
- 4.2.32 Stanford's map of 1862 (not reproduced), which like Greenwood's map does not show individual buildings shows no change within the site. The Ordnance Survey 1st edition 25":mile map of 1875 (Fig 8) is larger in scale and provides details regarding the number and location of buildings within the site. New buildings are shown in the south-west and south-east of the site, and possibly new terraced buildings in the north of the site, with associated backyards. By this time Hatton Garden had developed into a commercial centre for jewellery craftsmen and watch and clockmakers. A public house (PH) had been built 5m west of the site, across the alleyway into Bleeding Heart Yard. This was probably the 'Bleeding Heart', which lay close to Bleeding Heart Yard immortalised by Charles Dickens in *Little Dorrit (Old and New London 2, 1878, 542–52)*. Farringdon Road, initially called Victoria Street, was constructed in 1840, and is shown on the map 70m east of the site. The road was constructed along the course of the Fleet River, through the Saffron Hill rookeries, clearing some of London's most infamous slums in the area (Weinreb *et al* 2008, 286).
- 4.2.33 The Goad Fire Insurance Plan of 1886 (Fig 9) shows no change in the northern half of the site. In the southern half, the building on the western boundary remains unchanged but the buildings in the southern central and south-eastern parts of the site had been demolished and replaced with two new buildings. A courtyard has been created in the centre of the site (mostly covered) and two new smaller buildings within the courtyard have also been built. It shows that all these buildings were occupied by only five businesses, which were, reading west to east, a builder's workshop (south-west corner), a restaurant (north-west corner), metal spinners workshops, a warehouse for sheet glass and a smithy and offices. The use of the small buildings is not noted. The terraced buildings fronting Charles Street are recorded as four-storey buildings. The buildings on the south side are recorded as two storeys, apart from the small building in the centre which is a single storey. The Ordnance Survey 2nd edition 25":mile map of 1896 (not reproduced) shows minor change to the internal area on the eastern side and would suggest some internal boundary changes. It also shows the western building line of the site slightly angled, possibly to provide easier access into and out of Bleeding Heart Yard.
- 4.2.34 The Ordnance Survey 3rd edition 25":mile map of 1916 (Fig 10) shows that all buildings apart from what were the restaurant and builders yard been replaced by one large building. The map indicates that the western wall is still angled but not as exaggerated as depicted in the OS 1896 map. The Goad Fire Insurance Plan of 1920s (Fig 11) provides some idea as to the internal sub-division of the large building. It shows that the southern half of that building was basically one building. The two tenements on the north-eastern part of the site have been merged to form one, while the other two remain separate. The restaurant and what was the

builder's office and yard remain basically the same but an entranceway has been created between the two. The plan indicates the presence of a basement covering the two merged tenements in the north-eastern corner. The bomb damage map drawn up by the London County Council (LCC 1949–45, map 62; not reproduced) suggests that the site did not suffer any bomb damage during the Second World War.

- 4.2.35 The Ordnance Survey 1:2500 scale map of 1951 (not reproduced) shows little change apart from the 'absorption' of what was the builder's office and yard into the large building occupying the rest of the site, apart from the restaurant building in the north-western part. The Goad Fire Insurance Plan of 1950s (Fig 12) shows more details of the site during this period and while it indicates that it remained otherwise structurally unchanged, it shows that all of the site, apart from the restaurant and offices on the western boundary had been basemented. A basement plan showing proposed alterations from 1961 (not reproduced; Camden Local Studies and Archives Centre, 20-23 Greville Street, microfiche no. 3, drawing no. 1/GS/61) confirms the extent of the basements indicated on the Goad plan of the 1950s (Fig 12), showing that the south-west and south-east of the site remained unbasemented. The Ordnance Survey 1:2500 scale map of 1963 (not reproduced) shows no change. Photographs taken during a photo survey in Holborn in 1976–77 by the Camden History Society show brick built buildings occupying the site, with iron roll shutters along the south side of the site facing Bleeding Heart Yard (Camden Local Studies and Archives Centre, CH070377, C7, C8, C10), which suggests that these were the same buildings illustrated on the Goadplan of the 1950s (Fig 12).
- 4.2.36 The current building and car park occupying the site are first shown on the Ordnance Survey 1:2500 scale map of 1980 (not reproduced). The existing building has a lower ground floor which covers the majority of the site, apart from the small area in the south-west of the site, which is currently occupied by a car park at ground floor level (Fig 14 and Fig 15). There is a light well in the south of the site, at the lower ground floor level (Fig 14).

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 There is no geotechnical data for the site. Based on BGS boreholes and the information from archaeological investigations in the vicinity, the predicted level of natural geology within the site might be as follows:
- Current ground level is between 17.8m and 19.6m OD (the ground is sloping from west down to the east towards the River Fleet valley)
 - The top of gravel may be between 14.2m and 16.0m OD (3.6m below ground level/mbgl)
 - The top of London Clay may be found at levels varying between 15.5m and 18.5m OD (1.1–2.3mbgl)
- 5.2.2 Between the top of the natural and the current ground level in the unbasemented south-western part of the site might be made ground, the top 0.2m of which may be modern.

Historic impacts

- 5.2.3 Archaeological survival within the site is likely to be high in the south-west (20% of the site), outside the footprint of the existing lower ground floor (80% of the site). Within the footprint of the existing lower ground floor, the survival potential is likely to be low in the eastern part of the site and very low in the western part of the site (see section 3.4).
- 5.2.4 The site has undergone several building phases since the early 18th century. It is unknown whether any of the buildings prior to the early to mid 20th century buildings had cellars but if so, these will have completely removed all earlier archaeological remains within their footprint, with the exception of any deeply cut features. The foundations for these buildings, likely standard pad or raft foundations, will have reached a depth of up to 1.0–1.5mbgl, which, along with drainage and services, will have had a localised effect only and remains may survive between these intrusions.

Likely depth/thickness of archaeological remains

- 5.2.5 Any archaeological remains are likely to be directly beneath the existing carpark hardstanding and modern made ground, if present, in the south-west of the site, and beneath the existing lower ground floor slab formation level across the remaining parts of the site. Bases of deep cut features, such as foundations, footings, basements would be at the top of and cut into the natural clay between 1.1m and 2.3m below ground level/mbgl.

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 prehistoric remains.* The site was located on the edge of

a Gravel ridge, close to the resources of the Fleet River, 70m to the east of the site, which would have been a favourable area for early settlement. Despite this, no evidence for prehistoric activity has been found within the study area. The limited evidence of prehistoric activity in the vicinity of the site may be due to the removal of much of the prehistoric material by post-medieval development.

- 5.3.3 *The site has a low potential to contain Roman remains.* The site was 190m north of the Roman Silchester Road, probably too far north of the road to have been used for burials, recorded elsewhere along the road. During this period it is likely the site was located within farmland or woodland by the Fleet River, further to the north of the cemetery along High Holborn.
- 5.3.4 *The site has a low potential to contain Saxon remains.* Throughout this period, the site was located 140m north-west of the medieval settlement at Holborn, and some distance from the main settlement of *Lundenwic*. No Saxon remains have been found within the study area. It is therefore probable that the site lay within possible marshland or a meadow on the banks of the Fleet River.
- 5.3.5 *The site has a low to moderate potential to contain later medieval remains.* The site was located in the vicinity of Ely Palace, built in the early 14th century as a residence for the Bishops of Ely further south and south-west of the site. The only surviving building associated with the Palace is St Etheldreda's Church, 50m to the south-west of the site. The site itself was probably located along the southern side of the boundary wall between the palace garden to the north and open ground within the palace complex to the south. Any remains of the boundary wall, such as wall footings, would be of **low** or **medium** significance, derived from their evidential and historical value, whilst any remains of agricultural features, such as raised beds, would be of **low** significance.
- 5.3.6 *The site has a high potential to contain post-medieval remains.* From the early 18th century the site underwent extensive post-medieval suburban development, involving construction, demolition and modification of buildings, gardens and courtyards. Within the unbasemented south-west of the site there is potential for structural remains of 18th and 19th century buildings, including foundations and footings, whilst within the footprint of the existing lower ground floor there is potential for only the bases of features such as cellar floors and/or foundations, rubbish and cess pits, wells and drains, all of which would be of **low** significance.

6 Impact of proposals

6.1 Proposals

- 6.1.1 The scheme comprises the change of use of existing Class B1 at ground floor, basement and first floor levels to Class A1/A3 use; demolition of existing fifth floor plant room and construction of rooftop extension at fifth and mezzanine floor level for Class B1 use, rear infill extension to all floors for Class B1 use, external alterations including new façade and glazing, and associated works.
- 6.1.2 The proposed rear extension would be supported by piled foundations, either with pile caps or a raft foundation extending down to the lower ground floor level, within the unbasemented south-western part of the site, currently occupied by an external car park. The piles would be less than 12m deep, whilst the remaining dimensions have not been finalised. The existing lower ground floor would not be lowered or extended (Christopher Matthews, Atelierone, *pers. comm.* 09/11/2017; Seaforth Land 2017). A new lift pit is proposed in the west of the site, which would incorporate a new passenger lift running from the lower ground floor to first floors (Groupwork, dwg. no. 248–500, rev. K, date December 2017; Fig 16).

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 site has a high potential to contain post-medieval remains, of low significance, and a low to moderate potential to contain later medieval remains, of low or medium significance. The potential for later and post-medieval remains is higher within the unbasemented south-western 20% of the site, and moderate (bases of cut features only) within the remaining 80% of the site occupied by the existing lower ground floor.

Breaking out hardstanding

- 6.2.4 Breaking out of the existing hardstanding within the ground floor car park area in the south-west of the site would potentially truncate or remove entirely any archaeological remains directly beneath the slab. This might include remains of former 19th century buildings within the undated made ground.

New building extension

- 6.2.5 The proposed rear extension of the existing building from the second floor up in the south-west of the site would be constructed by the use of piled foundations, with either ground beams or raft foundations. The former lightwell area in the south of the site, looking down to lower ground floor level, would be incorporated into the building extension (Groupwork, dwg. no. 248–500, rev. K, date December 2017 and dwg. no. 248–501, rev. K, date 08/12/2017; Fig 16 and Fig 17). The effects of the two options are:

Standard piled foundations

- Any archaeological remains within the footprint of each pile would be removed as the pile is driven downwards. In this case, the piles would be less than 12m deep (Christopher Matthews, Atelierone, *pers. comm.* 09/11/2017). The density would be

relatively light and the foundations would only be constructed along the south-western edge of the site (Groupwork, dwg. no. 248–501, rev. K, date 08/12/2017, Fig 17). This would therefore have a localised effect only.

- The insertion of pile caps and connecting ground beams, along with the excavation of a pile guide trench, typically extend no more than 1.0–1.5mbgl. In the south-west of the site this would extend into undated made ground and truncate and remove any archaeological remains within the footprint of these works to this depth.

Piles and raft

- The excavation for a raft foundation would remove archaeological remains within the footprint of the raft to a typical depth of 0.5–1.0mbgl as assumed for the purposes of this assessment, with localised deeper excavation up to a further 0.5m for ground beams. Within the unbasemented south-western part of the site, it is possible that the bases of deep cut archaeological features such as cesspits and building foundations would remain intact beneath these impact levels, but their context could be lost.

New lift pit

- 6.2.6 The proposed new lift pit would incorporate a new passenger lift running from the lower ground floor to first floors in the west of the site (Groupwork, dwg. no. 248–500, rev. K, date December 2017; Fig 16). This would extend to a depth of 1.5m below the foundation slab formation level, as assumed for the purposes of this assessment. This would remove any archaeological remains within the pit footprint to this depth.

New services and drainage

- 6.2.7 Any 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 any archaeological remains within the trench footprint, both within the unbasemented south-west of the site and the existing lower ground floor footprint.

7 Conclusion and recommendations

- 7.1.1 The site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments, listed buildings or registered parks and gardens. The site is within the Hatton Garden Conservation Area and within the London Suburbs Archaeological Priority Area (APA), as defined by the London Borough of Camden.
- 7.1.2 Archaeological survival is likely to be high in the south-west of the site, outside the footprint of the existing lower ground floor. Beneath the existing lower ground floor, the survival potential is likely to be very low.
- 7.1.3 Breaking-out the existing hardstanding in the south-west of the site would potentially have an effect, truncating or removing entirely any archaeological remains directly beneath. New piled foundations in the south-west of the site would completely remove all archaeological remains within their footprint, but due to the relatively light density would have a localised effect. Any raft foundations would remove any archaeological remains within the footprint of the slab to its formation level, but it is possible that in the unbasemented south-western part of the site, the bases of deep cut archaeological features would remain intact beneath these impact levels, but their context could be lost. The excavation for the new lift pit in the west of the site would remove any archaeological remains within the pit footprint. Any excavation of new service trenches and drains would remove any archaeological remains within the trench footprint.
- 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
Post-medieval remains (high potential)	Low	Breaking out existing hardstanding in the south-west of the site, piled foundations, new services and lift pit: Significance of asset reduced to negligible
Later medieval remains (moderate potential)	Low or medium (remains of boundary wall for Ely Palace) Low (cut features)	Piled foundations, new services and lift pit: Significance of asset reduced to low or negligible Breaking out existing hardstanding in the south-west of the site: Negligible impact on asset significance

- 7.1.5 Although the site is located within Camden's London Suburbs Archaeological Priority Area, in view of the limited archaeological potential and the relatively small and localised area of proposed impact, it is unlikely that the local authority would require preliminary archaeological field evaluation of the site prior to the determination of planning consent. The archaeological monitoring of any geotechnical investigations may, however, help to determine the current extent and depth of truncation. Once the foundation design has been refined and the scale of ground disturbance is known, an appropriate strategy for further archaeological investigation and / or mitigation could be drawn up to ensure that any archaeological assets were not removed without record. Any archaeological work would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and could be carried out under the terms of a standard archaeological planning condition set out with the granting of planning

consent.

8 Gazetteer of known historic environment assets

- 8.1.1 The gazetteer lists known historic environment sites and finds within the 160m-radius study area around the site (listed building 50m). The gazetteer should be read in conjunction with Fig 2.
- 8.1.2 The GLHER data contained within this gazetteer was obtained on 03/11/2017 and is the copyright of Historic England 2017.
- 8.1.3 Historic England statutory designations data © Historic England 2017. Contains Ordnance Survey data © Crown copyright and database right 2017. The Historic England GIS Data contained in this material was obtained in October 2017. The most publicly available up to date Historic England GIS Data can be obtained from <http://www.historicengland.org.uk>.

Abbreviations

AOC - AOC Archaeology

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

DUA - Department Urban Archaeology

ELO – Greater London Historic Environment Record unique Event reference

GM - Guildhall Museum

GLHER – Greater London Historic Environment Record

ILAU - Inner London Archaeology Unit

MLO – Greater London Historic Environment Record unique Monument reference

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

PCA – Pre-Construct Archaeology Ltd

HEA No.	Description	Site code/HER/NHL No.
1	25 and 27 Farringdon Road Grade II listed workshops from 1873–4.	NHL1078338
2	St Andrew's House Grade II listed building, built in 1875. This block, originally known as Viaduct Buildings, is the oldest surviving public housing in London and one of the oldest in Britain.	NHL1356864
3	1–2 Kirby Street, 29–31 Greville Street In 2006 MoLAS carried out a watching brief in which London Clay was observed.	KYG06 ELO7738
4	6–10 Kirby Street, 119–124 Saffron Hill In 2000 MoLAS carried out an evaluation and watching brief in which waterlogged dumped deposits, probably from the backfilling of a pond or stream, were recorded above the natural gravels. These were cut by brick wall foundations, dated to the mid-late 17th century, one of which was constructed on a raft of sawn timbers supported by timber piles. The foundations were sealed by further dumps. To the east and fronting onto Saffron Hill, 18th or 19th century cellars were recorded, the infill of one containing several redeposited, disarticulated human bones. In the south and west of the site, 19th century brick tanks were recorded beneath a basement. These were constructed of a single course of black "bull-nosed" bricks bonded onto rendered red brick walls set on a concrete platform above the London Clay. Natural gravels above London Clay were sealed by modern make-up.	KIY00 ELO233 ELO3798 MLO75733 MLO75186 MLO75187 MLO75188 MLO75189
5	17 Charterhouse Street, (extension) 138–140 Saffron Hill, Hatton Garden In 2002 MoLAS carried out an evaluation and watching brief in which it was found that London Clay in the west of the site had been removed by a large quarry pit which contained material dated to the late 15th - turn of the 16th/17th century. The pit would have been situated on the margin of the Bishop of Ely's Inn, shortly before it was sold for 17th century suburban development. A late 17th or early 18th century brick drain was traced, indicating that the contemporary property, 138 or 140 Saffron Hill, had no cellar. A cellar of similar date, however, was located for the property to the north, 136 Saffron Hill.	CSG02 ELO336 ELO229 MLO75728 MLO75818 MLO76560

HEA No.	Description	Site code/ HER/NHL No.
6	<p>141–145 Saffron Hill, EC1 A 1978 excavation carried out by ILAU revealed topographical data, and the foundations of the Ukrainian church. In 1981 at Saffron Hill, EC1, presumably at the same site, ILAU carried out an examination in 1981 of a wooden tree-trunk pipe, one of several apparently encountered by the contractor.</p>	SFR78 SFR81 ELO4504 ELO14518 MLO17854 MLO63103
7	<p>Ukrainian Church Site, 147–152 Saffron Hill and 11-21 Charterhouse Street In 1975 ILAU carried out trial trenching that showed that any archaeological levels would have been removed by basements.</p> <p>At Afsil House, also with the given address as 147–152 Saffron Hill, ILAU carried out a watching brief in 1977 and recorded the filled-in bed of the River Bourne. Much of the site was disturbed by modern basements however.</p>	SFR75 SFR77 ELO4502 ELO4503 MLO63102
8	<p>31–32 Ely Place, 34 Ely Place, 33 Ely Place In 1990 DGLA carried out a watching brief during the refurbishment of a Georgian terrace. Substantial remains of the hall and east range of the London residence of the bishops of Ely, documented from 1290 were recorded. Human burials included two thought to date to the Civil War period, when the site was used as a prison and hospital. Several other features were noted, including a possible Roman ditch. Most deposits will be preserved in situ.</p> <p>John de Kirkeby, Bishop of Ely from 1286 to 1290, left the land that Ely house is built on to his successors. William de Luda donated more land (1290 to 1298) & the chapel was built by 1303. The house itself was built by 1320. In 1336, Bishop John de Hotham added six messuages (a house and lands), two cellars & 40 acres of land. In 1373, Thomas Arundel became bishop. He extended the house, building the cloisters & a gatehouse. The bishops used this building themselves until 1576, when they leased part to sir Christopher Hatton for his use as a town or manor house. It was used during the civil war as a prison and later a hospital.</p>	EEL90 ELP90 ELY90 ELO3240 ELO3234 ELO3224 MLO17855 MLO18067 MLO18068 MLO25934 MLO46409 MLO46410 MLO46411 MLO25932 MLO25933 MLO53721 MLO25785 MLO25935 MLO38805
9	<p>St Ethelreda's Church, Ely Place An excavation by DGLA in 1985 examined the north portion of the west cloister of the town house (1290–1300) of the bishops of Ely and exposed a 9.0m length of the cloister floor, at one point to its full width of 3.0m. It was tiled with green-glazed and yellow-slipped Flemish tiles, laid in a diagonal chequerboard pattern. To the west a substantial cloister wall, about 0.9m wide, was uncovered, aligned askew to the chapel and crypt of the palace and constructed of ragstone with a white plaster facing.</p>	ELY85 ELO3239 MLO56818 MLO56836
10	<p>St Ethelreda's Clergy House, Ely Place A watching brief by DGLA in 1983 recorded the relieving arch of a 13th century crypt.</p>	ELY83 ELO3238 MLO63098
11	<p>Thameslink Cardinal House, 2–12 Farringdon Road In 2010 MoLAS carried out a watching brief as part of the proposed Thameslink redevelopment at Farringdon Station. Works for ten pile caps and a thrust pit were monitored. Natural gravel was found to be truncated to 4.5m OD. The earliest archaeological survival was dated to the early 20th century and consisted of the remains of a wooden railway carriage turning table.</p>	FAN10
12	<p>11–14 Kirby Street In 1998 MoLAS carried out an evaluation, watching brief. To the north of the site, a stream, probably a western tributary of the River Fleet was recorded. In the south west were revealed waterlaid silts that may represent a series of ponds or flooded quarry pits around the stream. The stream seems to have been infilled in the 17th century and consolidated in the 18th century, prior to building development. Several Bellarmine jugs and the partial skeletons of two dogs were recovered from the uppermost fill. A truncated wall foundation, probably of 18th century date, was recorded, and in the south east area a broadly contemporary pond which had also been deliberately backfilled prior to building construction, was located. Several human skeletons, redeposited probably in the 19th century, were also found. The site was then severely truncated by the existing basements and foundations of a modern building.</p>	KBY98 ELO3768 MLO73631 MLO73632 MLO73633 MLO73634

HEA No.	Description	Site code/ HER/NHL No.
13	106–109 Saffron Hill, Holborn In 2011 PCA carried out a watching brief over the excavation of six test pits and two boreholes. Heavily truncated London Clay was recorded and a brick culvert possibly dating to the 18th or 19th century.	SFH11 ELO11847 MLO103543
14	36–43 Kirby Street In 2007 MoLAS carried out an evaluation which recorded demolished 19th century basements cutting into natural sands. Modern concrete overlay the features.	KIT07 ELO7221 MLO99237
15	Thames Water Victorian Mains Replacement Works, Area of Hatton Garden Watching brief by CA in 2017, as noted by the GLHER. No further information yet available.	HGD17 ELO17529
16	Farringdon Station: Thameslink 2000, Cowcross Street In 2007 MoLAS carried out a watching brief, which recorded remains associated with the construction of the railway.	FNG02 ELO7554
17	Shoe Lane, 2 Charterhouse Street (open space at rear), 10 Holborn Viaduct In 1954 GM carried out a watching brief, which recorded a Roman cremation. Bones were contained in the lower half of a decorated grey ware olla set in natural clay. A chalk cesspit produced a group of artefacts of the first quarter of the 18th century: glass and clay tobacco pipes.	GM165 ELO16133 MLO1605
18	Salisbury Square Salisbury Court Theatre stood on the site from 1629–1666. Located within the Liberty of the Inn of the Bishops of Salisbury, the playhouse was either a newly built structure or a conversion of an existing building.	MLO73305 044992/00/00
19	Farringdon Street The site of Holbourne settlement is marked on the GLHER. Holborn settlement first grew up around the bridge where the main street crossed the stream. It is mentioned in Domesday in 1086. It then grew as a ribbon development along the main road.	MLO18007 082059/00/00
20	Farringdon Road The medieval road is listed in the GLHER. On the 16th century Agas's map, and on Rocque's mid-18th century map the road is shown unmarked and to the west of the River Fleet.	MLO24967 082085/00/00
21	Holborn Find spot of a 14th century iron crossbow-bolthead of unusual design, thought to be an incendiary weapon, found in excavations for the pneumatic tube at Holborn in 1869.	MLO5829 082345/00/00
22	61 Farringdon Road The site of a destructive hit by a zeppelin raid on September 8th 1915	MLO105267
23	Farringdon Road A three arched structure with 30 openings containing tiles etc., thought to be a later medieval tile kiln, was found on the bank of the fleet during excavations for the metropolitan railway, near Farringdon station. The kiln measured 16 x 10 ft. & was made of tiles. It produced tiles with decorations such as the fleur-de-lys & double headed eagle.	MLO16254 080390/00/00

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.

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). One of the 12 core principles that underpin both plan-making and decision-taking within the framework is to 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations' (DCLG 2012 para 17). It recognises that heritage assets are an irreplaceable resource (para 126), and requires the significance of heritage assets to be considered in the planning process, whether designated or not. The contribution of setting to asset significance needs to be taken into account (para 128). The NPPF encourages early engagement (i.e. pre-application) as this has significant potential to improve the efficiency and effectiveness of a planning application and can lead to better outcomes for the local community (para 188).

- 9.2.2 NPPF Section 12: Conserving and enhancing the historic environment, is produced in full below:

Para 126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:

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

Para 127. 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 128. 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 129. 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 assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Para 130. 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 131. In determining planning applications, local planning authorities should take account of:

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

Para 132: 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Para 133. 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 loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

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

Para 134. 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 securing its optimum viable use.

Para 135. 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 affect directly or indirectly 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 136. Local planning authorities should not permit 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 137. 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 or better reveal the significance of the asset should be treated favourably.

Para 138. Not all elements of a World Heritage Site or Conservation Area 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 133 or less than substantial harm under paragraph 134, 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 139. Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

Para 140. 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.

Para 141. Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also 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.

9.3 Greater London 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). Policy 7.8 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.

9.3.2 Para. 7.31A 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 if the benefits of departing from those policies outweigh the disbenefits.'

9.3.3 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'.

9.3.4 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'.

9.4 Local planning policy

9.4.1 Following the Planning and Compulsory Purchase Act 2004, Planning Authorities have replaced their Unitary Development Plans, 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 Camden Local Plan was adopted on 3rd July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough (Camden.gov.uk; LBC 2017). Policy D2 – Heritage broadly covers heritage issues.

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

Designated 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 Table 3 gives examples of the significance of designated and non-designated heritage assets.

Table 3: Significance of heritage assets

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

10.1.3 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 13.4, 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

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

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

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Existing ground floor plan (Groupwork, dwg. no. 248-101, rev. A, date 26/04/2017)

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Proposed ground floor plan (Groupwork, dwg. no. 248-501, rev. K, date 08/12/2017)

13.4 Available site survey information checklist

Information from client	Available	Format	Obtained
Plan of existing site services (overhead/buried)	Y	–	–
Levelled site survey as existing (ground and buildings)	Y	–	–
Contamination survey data ground and buildings (inc. asbestos)	N	–	–
Geotechnical report	N	–	–
Envirocheck report	N	–	–
Information obtained from non-client source	Carried out	Internal inspection of buildings	
Site inspection	Y	Y	



Fig 1 Site location



Fig 2 Historic environment features map



Fig 3 Agas's map of 1562



Fig 4 Faithorne and Newcourt's map of 1658



Fig 5 Ogilby and Morgan's map of 1676



Fig 6 Rocque's map of 1746

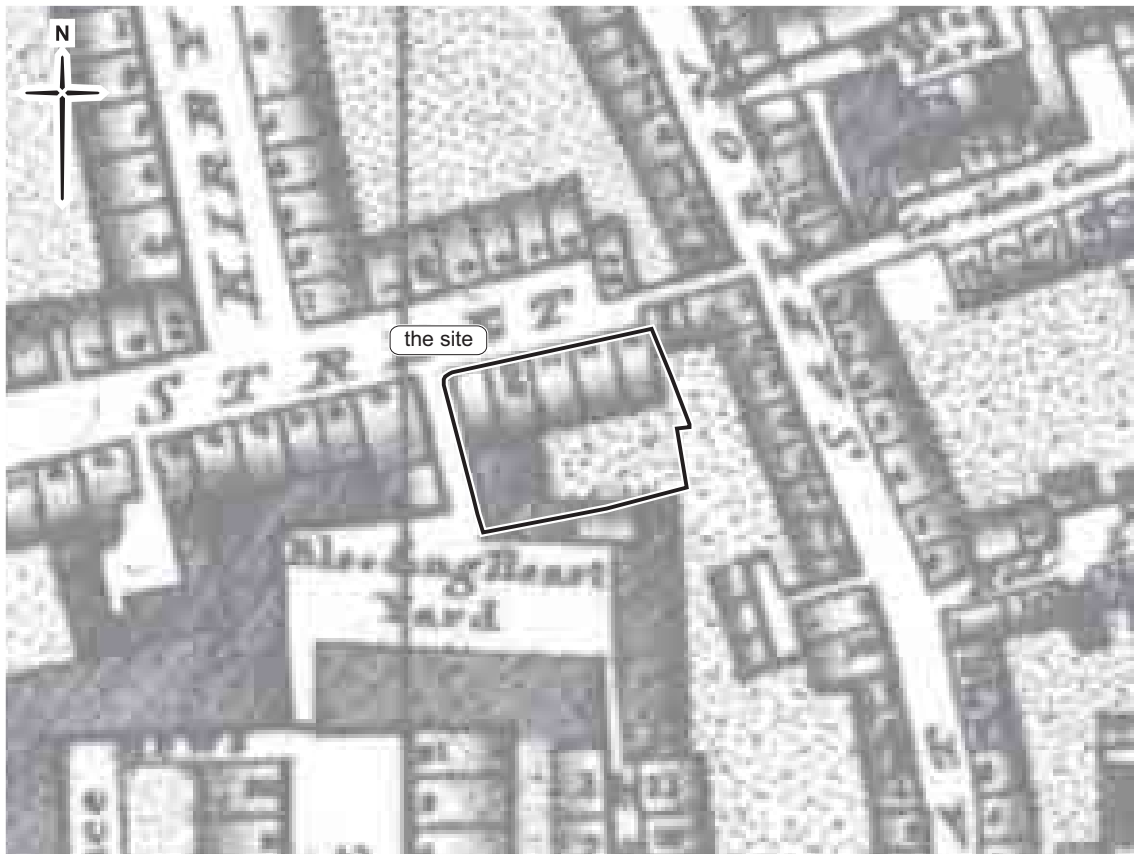


Fig 7 Faden's 1813 revision of Horwood's map of 1799



Fig 8 Ordnance Survey 1st edition 25":mile map of 1875 (not to scale)

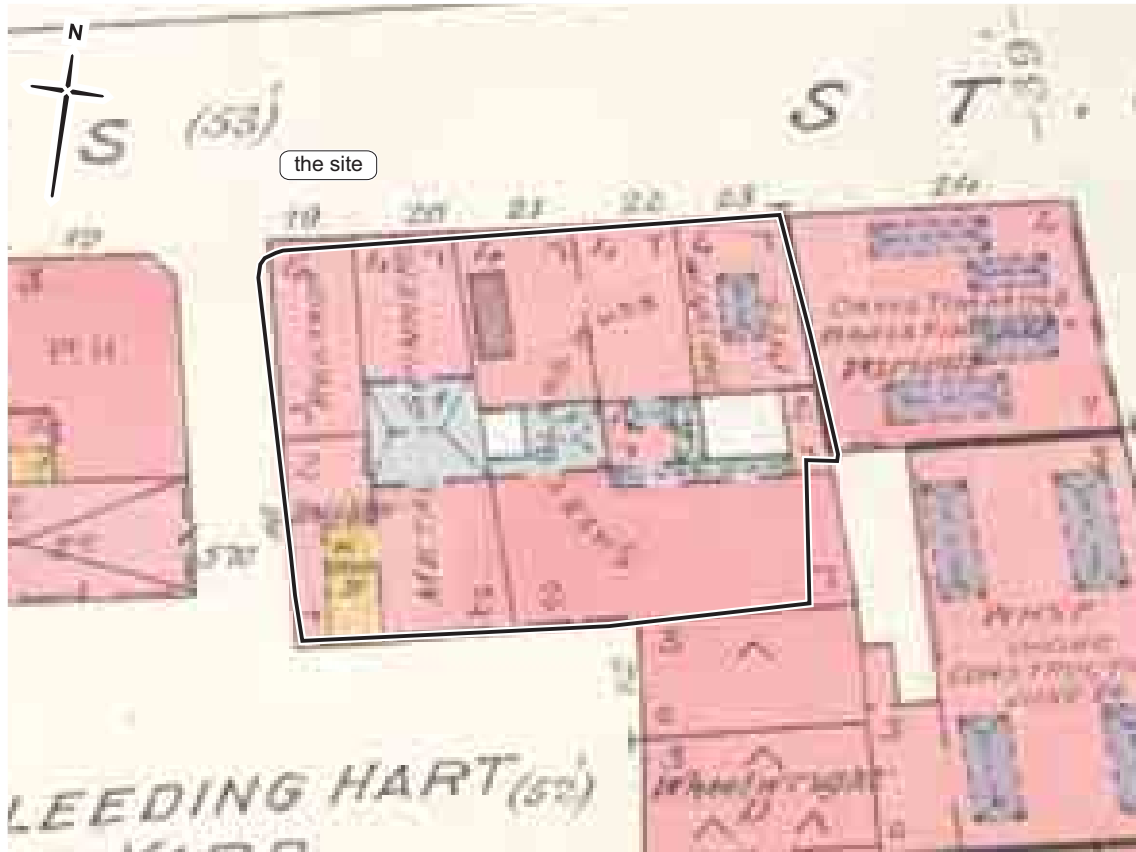


Fig 9 Goad Fire Insurance Plan of 1886 (@British Library, shelfmark: Maps 145.b.22.(.2))



Fig 10 Ordnance Survey 3rd edition 25":mile map of 1916 (not to scale)

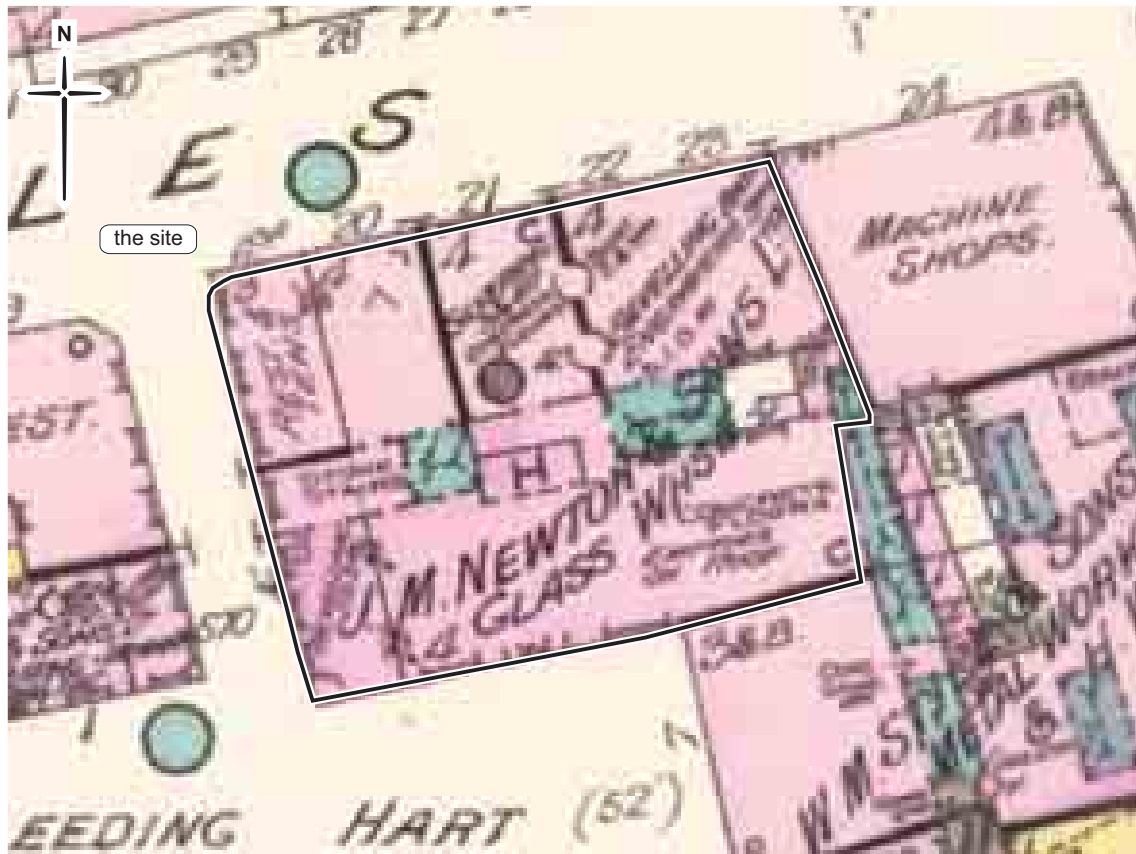


Fig 11 Goad Fire Insurance Plan of 1920s (Groundsure)

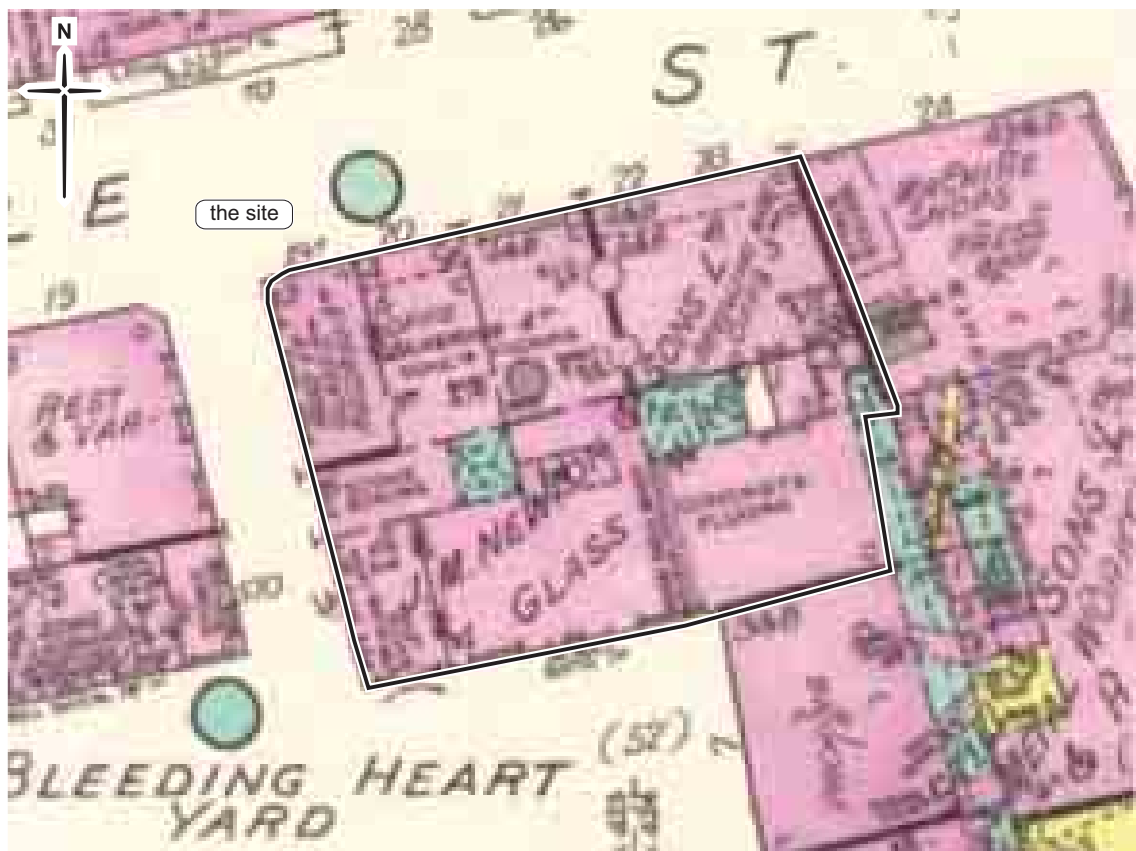


Fig 12 Goad Fire Insurance Plan of 1950s (Groundsure)



Fig 13 View looking south-east, showing the northern side of the existing building within the site (MOLA site visit 03/11/2017)



Fig 14 View looking up towards the south-west and the existing carpark at ground floor (MOLA site visit 03/11/2017)

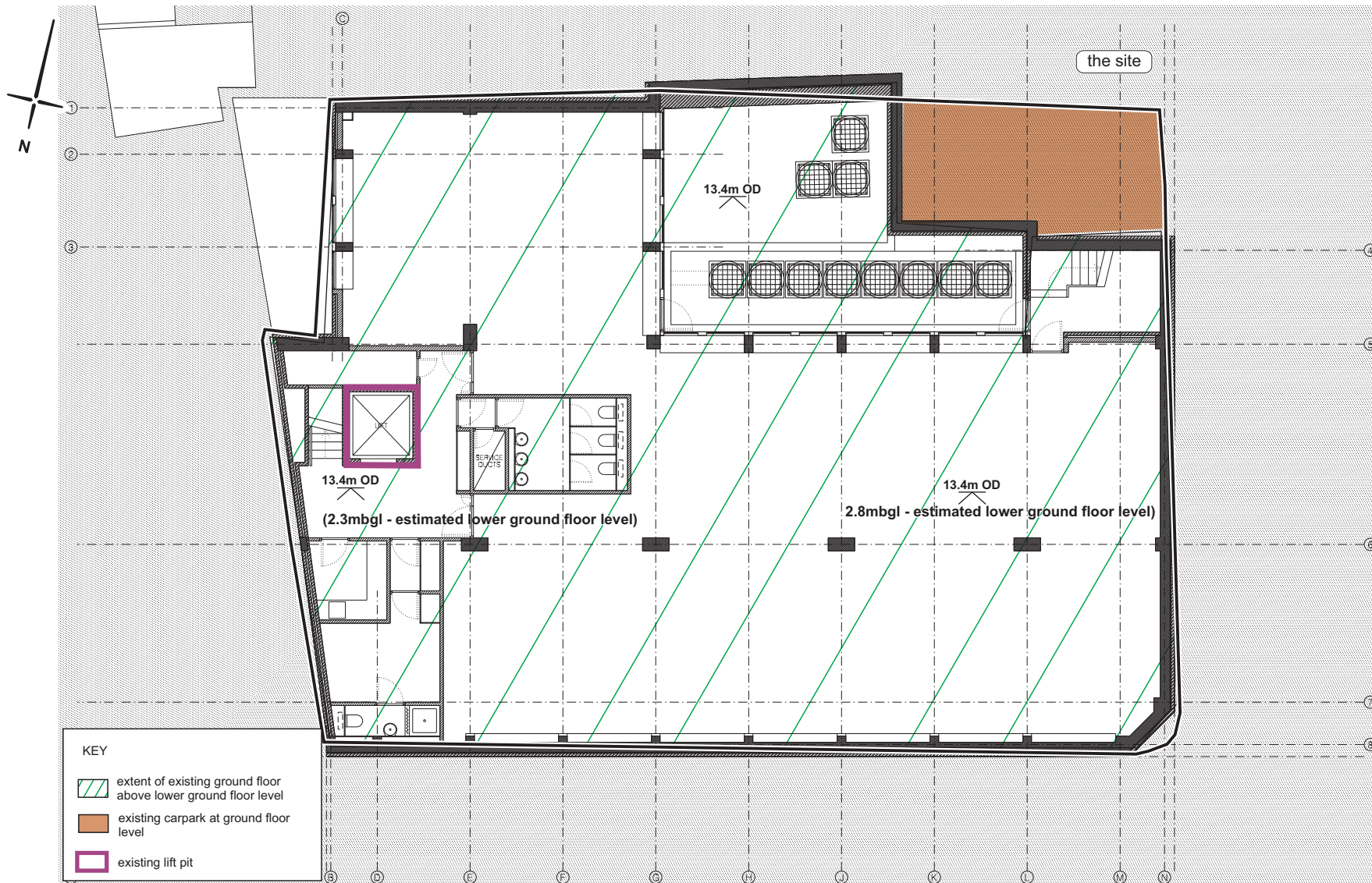


Fig 15 Plan of existing lower ground floor with estimated floor level, showing the extent of the ground floor above (Groupwork, dwg. no. 248-100, rev. A, date 26/04/2017)

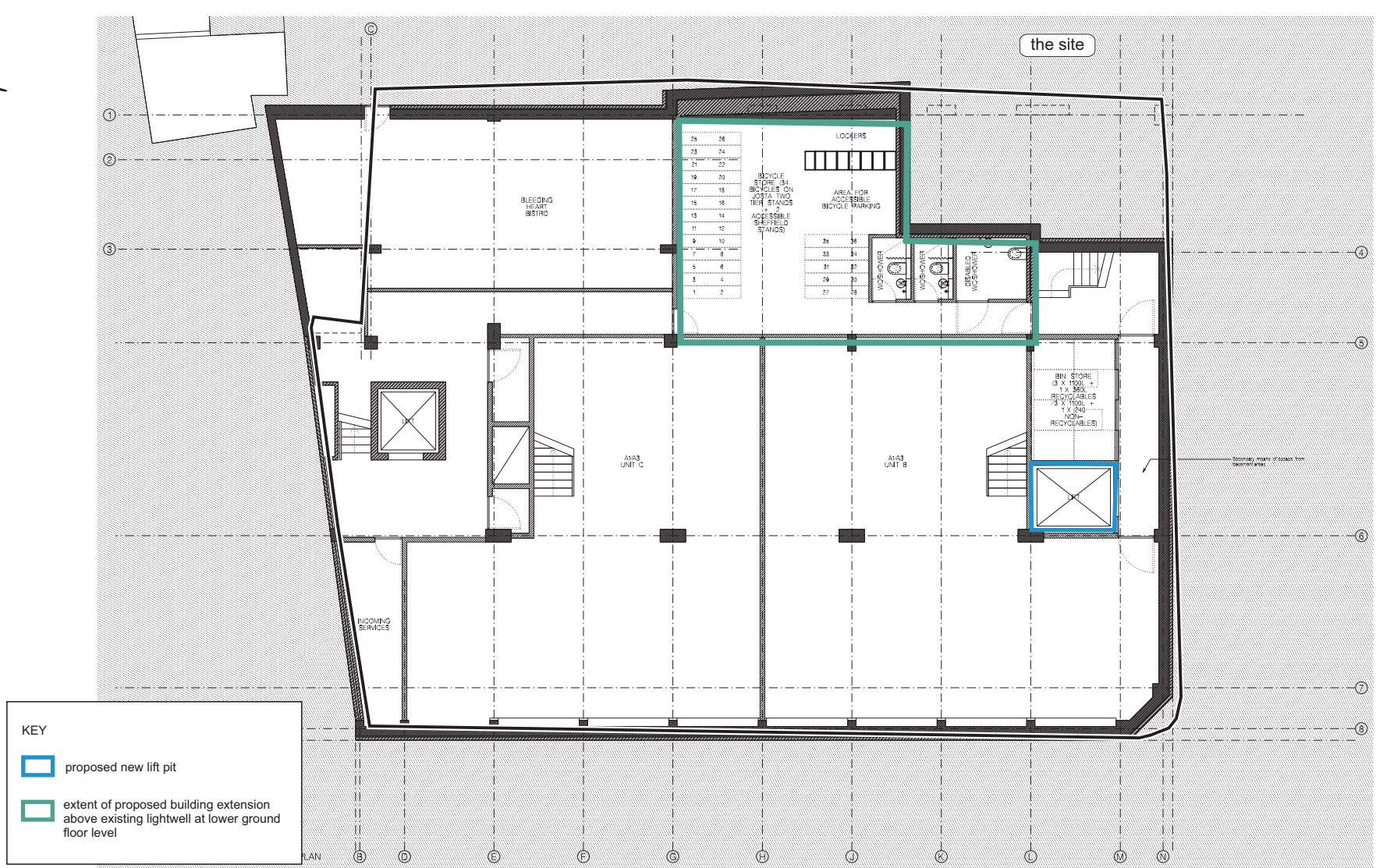


Fig 16 Plan of proposed alterations to the existing lower ground floor, showing the location of the proposed new lift pit (Groupwork, dwg. no. 248-500, rev. K, date December 2017)

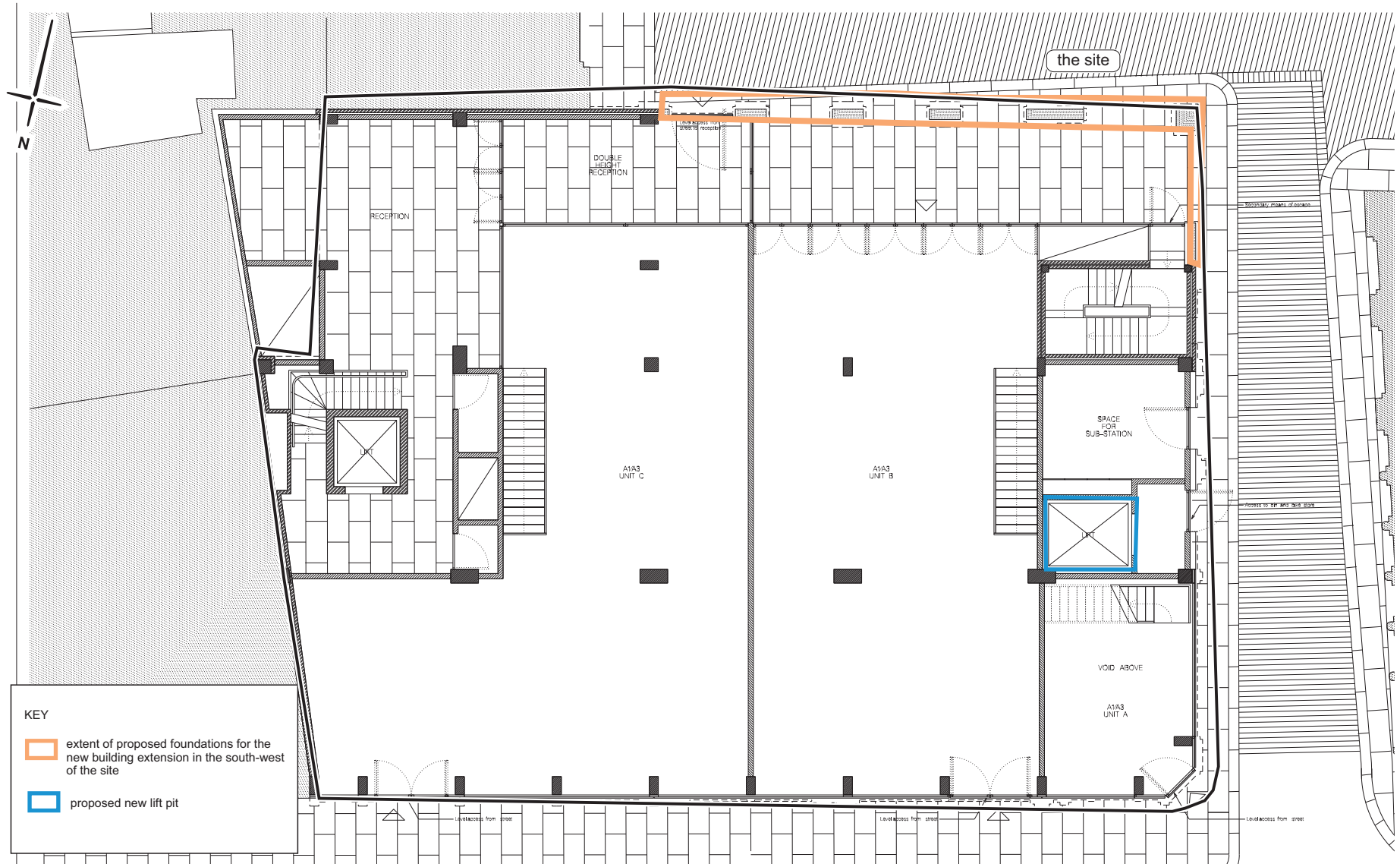


Fig 17 Plan of proposed ground floor, showing the location of new foundations to support the new building extension above ground floor level (Groupwork, dwg. no. 248-501, rev. K, date 08/12/2017)