



Historic England

Mr John Diver  
London Borough of Camden  
Town Hall,  
Camden Town Hall Extension,  
Argyle Street,  
Camden,  
London,  
WC1H 8ND

Your Ref: 2020/4825/P  
Our Ref: CLO32481  
  
Contact: Laura O’Gorman  
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HistoricEngland.org.uk

23 November 2020

Dear Mr Diver,

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

**St Pancras Hospital 4 St Pancras Way London NW1 0PE**

*Partial redevelopment of the site, involving the demolition of seven existing buildings (Ash House, Bloomsbury Day Hospital, the Camley Centre, Jules Thorn Day Hospital, Kitchen and the Post Room & Former Mortuary) and construction of a part seven, part ten storey (plus roof plant) purpose-built eyecare, medical research and educational centre for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity. New building to comprise a mixture of clinical, research and education purposes, including eye care accident and emergency department, outpatients, operating theatres, research areas, education space, cafe and retail areas, admin space and plant space. Associated site relandscaping works including formation of patient drop off area to St Pancras way, new public realm and routes through the site, cycle parking and servicing ramp and cross over to Granary street.*

**Recommend Archaeological Condition(s)**

Thank you for your consultation dated 12 November 2020.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.



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NPPF Section 16 and the Draft London Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest

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

NPPF paragraphs 185 and 192 and Draft London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

The proposals include the demolition of the buildings within the site and the construction of a new building with a lower ground floor level that would cover the majority of the site. This would completely remove any archaeological remains from within the development footprint. The proposals would also result in the removal of buildings associated with the late 19th-century and early 20th century workhouse development phases which are of local significance.

Although the site does not lie within an archaeological priority area, it does include the site of the St Pancras Workhouse. It is not unusual for workhouses to bury their dead within the workhouse grounds, however given the close proximity of the workhouse to the St Giles burial ground it may be that the workhouse utilised this instead. Unfortunately, in the absence of evidence it can not be ruled out that burials did not take place within the application site.

In such circumstances, normal procedure would be to carry out an evaluation as part of the application, however I acknowledge that the site is still a working hospital and given the current Covid-19 pandemic, a robust evaluation at this stage is unlikely to be possible and so the result would most likely prove to be inconclusive. I am therefore happy for any evaluation to be carried out in accordance with an archaeological planning condition. The scope of the evaluation would need to be robust enough to ascertain the presence or absence of human remains as well as assess the survival potential of the remains of earlier workhouse buildings. The results will help to inform the need and scope for any further archaeological mitigation.

A programme of Level 3 historic building recording should also be carried out on the surviving buildings which predate the 1970s phase of development. These buildings are clearly set out on pages 42 and 43 of the submitted Townscape, Heritage and Visual Impact Assessment (KM Heritage, November 2020).

I therefore recommend attaching a condition as follows:

### **Archaeology Condition**

Condition No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and



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the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits.
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

**Informative** Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

### **Historic Building Recording Condition**

**Reason** Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF.

**Condition** No demolition shall take place until a written scheme of historic building investigation (WSI) has been submitted to and approved by the local planning authority in writing. For buildings that are included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

- A. The programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

**Informative** The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.



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

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

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

Yours sincerely

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



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