



# Historic England

Mr John Sheehy  
London Borough of Camden  
Town Hall,  
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Argyle Street,  
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Your Ref: 2020/5633/P  
  
Our Ref: CLO33560  
06/434  
Contact: Louise Davies  
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19 May 2021

Dear Mr Sheehy

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

### **14-19 Tottenham Mews London W1T 4AA**

*Erection of a six storey building (and basement) to provide office (use Class E) at part ground and basement levels and self-contained flats (use class C3) at ground and floors one to five; with associated landscaping, cycling parking and enabling works. CONSULTATION NOTE: Application is linked to redevelopment of Network building and flats (ref 2020/5624/P).*

### **Recommend Archaeological Condition(s)**

Thank you for your consultation received on 12 May 2021.

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

NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189

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says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

The planning application lies in an area of archaeological interest.

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

The background history to the site has been summarised in the Desk-Based Assessment (MOLA, November 2020). The site remained undeveloped until the end of the 18th century, and was possibly quarried prior to this date. There is evidence for quarry pits backfilled with domestic rubbish at the Middlesex Annex site to the north. A significant number of burials have been recorded to the immediate north of the site, and although the site is thought to have been outside the burial ground boundary, alterations and underpinning to the boundary wall may have resulted in disarticulated remains extending to within the site. There may also have been earlier workhouse buildings extending onto the site which are not shown on historic mapping.

The earliest mapping evidence to show development on the site is Horwood's map of 1792, which shows the site is entirely built up. Later maps show the site was occupied by a brass and gun metal founders. Documentary evidence shows that the brass works was founded in 1793 by Philip Wilkinson and traded as Philip Wilkinson and Sons. Their premises for nearly 180 years were at 14-19 Tottenham Mews, therefore the buildings shown on the Horwood map are likely to be the earliest phase of the brass foundry. Sources note that Philip Wilkinson and Sons had links to Wilkinson Sword and further documentary research is needed to investigate the social historic of the site.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend attaching a condition as follows:

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



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authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

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

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

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

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

I envisage that the archaeological fieldwork would comprise the following:

## Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques



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depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Archaeological evaluation trenches are required to test the depth of modern disturbance and whether and remains of the brass works or earlier features survive on the site.

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

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

Yours sincerely

**Louise Davies**

Louise Davies

Archaeology Advisor

Greater London Archaeological Advisory Service

London and South East Region



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