



# EUSTON TOWER

Archaeological Desk-Based Assessment

December 2023



**EUSTON TOWER**  
**286 Euston Road**  
**London NW1**

## **Archaeological Desk Based Assessment**

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### Sign-off history

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# Executive summary

*British Land Property Management Limited has commissioned Museum of London Archaeology (MOLA) to carry out an Archaeological Desk Based Assessment in advance of Proposed Development at Euston Tower, 286 Euston Road, NW1, in the London Borough of Camden. The Proposed Development comprises redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works. The existing basement B1 (which covers the whole of the Site) would be retained and refurbished. A new basement level B2, comprising an additional 246sqm of basement (below the existing) is proposed to accommodate a water tank and plant room, with a footprint c 34m by c 7m and excavated to a depth of c 8.5m.*

*One archaeological investigation has been carried out on the Site. In December 2005, a new loading bay was monitored during the redevelopment of the underground car park. No archaeological remains were observed, and it was concluded that within its footprint the basement had already removed any archaeological remains previously present, down to natural deposits.*

*This desk-based study assesses the impact of the scheme on archaeological remains (buried heritage assets). Above ground heritage assets (historic structures) are not discussed in detail, but they have been noted where they assist in the archaeological interpretation of the Site.*

*The Lynch Hill gravel on which the Site is located is noted for occasional in situ Palaeolithic artefacts at depth within the fine-grained interglacial lenses, but their likely presence is very difficult to predict. There is, therefore, a low to moderate potential for isolated stone tools within the gravels, of low heritage significance, which are considered to be the only archaeological remains which would be affected by the proposals.*

*The potential for remains of all other archaeological periods is thought to be generally low. The Site is located away from areas of Roman settlement and Roman roads. Evidence of Roman activity in the study area is limited to one findspot. The Site is located to the east of the early medieval manor of Totehele, which, in the later medieval period the manor was known as Tottenhall. An excavation at 250 Euston Road, 80m to the east of the Site recorded a small quantity of early medieval pottery and later medieval remains comprising yard surfaces, a large latrine, remains of walls and a stone garderobe pit containing 16th century deposits. The Site remained in fields just to the west of Tottenhall Manor and any remains associated with the manor will have been removed by the existing basement. From available historic maps, the Site was first developed in the late 18th century and was further developed though the 19th century. Any remains of these previous buildings will also have been removed by the existing basement.*

*Archaeological survival potential is low. Construction of the existing basement will have removed archaeological remains, other than possible isolated prehistoric stone tools within the gravels beneath. Any such artefacts within the extent of the proposed excavation for basement level B2 would be removed.*

*In view of the generally low potential of the Site to contain significant archaeological assets, as set out in this assessment in accordance with the National Planning Policy Framework, it is unlikely that the London Borough of Camden's archaeological advisor would request preliminary archaeological field evaluation. It is possible, however, that an archaeological watching brief would be required during ground reduction for the proposed basement level B2, which in accordance with the London Borough of Camden's policies regarding archaeological heritage assets, would ensure that if such assets are affected they are not removed without record. Alternatively the archaeological monitoring of any preliminary geotechnical investigations could clarify the nature and depth of deposits, and based on the results no further work may be necessary. 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 grant of planning consent.*

# 1 Introduction

## 1.1 Origin and scope of the report

- 1.1.1 British Land Property Management Limited has commissioned Museum of London Archaeology (MOLA) to prepare an Archaeological Desk Based Assessment in advance of Proposed Development at Euston Tower, 286 Euston Road, NW1; National Grid Reference (NGR) 529178 182354: Fig 1. The Proposed Development comprises redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works. The existing basement B1 (which covers the whole of the Site) would be retained and refurbished. A new basement level B2, comprising an additional 246sqm of basement (below the existing) is proposed to accommodate a water tank and plant room, with a footprint c 34m by c 7m and excavated to a depth of c 8.5m.
- 1.1.2 This desk-based study assesses the impact of the scheme on archaeological remains (buried heritage assets). 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 on 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.
- 1.1.3 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 where appropriate. The report does not assess issues in relation to the setting of above ground assets (e.g., visible changes to historic character and views).
- 1.1.4 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DLUHC 2023; see section 9 of this report) and relevant local planning policies. It conforms to standards specified by the Chartered Institute for Archaeologists (CIfA 2020), Historic England (EH 2008, HE 2015, 2017, 2019), and the Greater London Archaeological Advisory Service (GLAAS 2015). Under the 'Copyright, Designs and Patents Act' 1988 MOLA retains the copyright to this document.
- 1.1.5 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 Heritage designations

- 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 NHL does not include any nationally designated heritage assets within the Site.
- 1.2.2 The Site is not in a conservation area or an archaeological priority area (APA) as defined by the LPA.

## 1.3 Aims and objectives

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### 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, documentary and cartographic sources including results from any archaeological investigations in the Site and the 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 500m-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, 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 The extent of investigations as shown on Fig 2 may represent the site outline boundary for planning purposes, rather than the actual area archaeologically investigated. Where it has not been possible from archive records to determine the extent of an archaeological investigation (as is sometimes the case with early work), a site is represented on Fig 2 only by a centrepoint.
- 2.1.4 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;
  - Groundsure– historic Ordnance Survey maps from the first edition (1860–70s) to the present day.
  - British Geological Survey (BGS) – solid and drift geology digital map; online BGS geological borehole record data;
  - British Land – architectural drawings (3XN, 2023)
  - Internet – web-published material including the Adopted Camden Local Plan 2017, and information on conservation areas (<https://www.camden.gov.uk/conservation-areas>).
- 2.1.5 A site visit has not been undertaken. Plans of the existing building were available for the assessment, whilst the street frontages were viewed via Google Streetview.

### 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 assessment reference number (**DBA 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 150m) 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) and unless otherwise stated are measured from the nearest part of the Site boundary.

- 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

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- 2.3.1 No recent geotechnical data is available for the Site. Detailed prediction of geological levels within the Site is based on data from an archaeological watching brief undertaken in December 2005. No further work has taken place on the Site so the level observed in 2005 will still be appropriate to the current conditions on the Site.

## 3 The Site: topography and geology

### 3.1 Site location

- 3.1.1 The Site is located at Euston Tower, 286 Euston Road, NW1 3DP (NGR 529178 182354: Fig 1). The Site area is 0.9ha and is bounded by Euston Road to the South, Hampstead Road to the east, 10–30 Brock Street to the north and 1,2,4 and 7 Triton Square to the west. The Site falls within the historic parish of St Pancras, formerly in the county of Middlesex, and is now within the administration of the London Borough of Camden.
- 3.1.2 The Site is 2.2km north-west of the River Thames. A tributary of the former River Fleet is recorded 170m the south-east of the Site.

### 3.2 Topography and geology

- 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. The underlying natural geology of a site can also provide an indication of suitability for early settlement, and potential depth of remains.
- 3.2.2 The Site is relatively flat with changes in level due to modern development. The ground level is recorded at 27.7m above Ordnance Datum (OD) in the south-eastern corner of the Site, 27.7m OD in the south-western corner of the Site, 27.6m OD in the north-western corner of the Site, and 27.6m OD in the north-eastern corner of the Site (Unreferenced topographic survey data, supplied by 3XN). A basement covers the whole footprint of the Site and extends beyond to the west, north and east.
- 3.2.3 London occupies part of the Thames Basin, a broad syncline of chalk filled in the centre with Tertiary sands and clays. In London, this Tertiary series of bedrock consists of London Clay. Above the bedrock lie the Pleistocene (Quaternary) fluvial deposits of the River Thames arranged in flights or gravel terraces. These terraces represent the remains of former floodplains of the river, the highest being the oldest with each terrace becoming progressively younger down the valley side.
- 3.2.4 According to British Geological Survey data the underlying geology of the Site comprises Thames Gravels of the Lynch Hill Formation.
- 3.2.5 In places the Gravels are capped by a fine-grained silt known in London as Langley Silt Complex ('brickearth'), which was laid down as alluvium and/or wind-blown deposits during the last glaciation around 17,000 BC. This produced fertile soils but was often exploited for the manufacture of bricks and much has been removed by quarrying or by subsequent building development. The archaeological watching brief on the Site (**DBA 1**) recorded the underlying natural geology as being brickearth.
- 3.2.6 The depth of natural geology in the Site as an indicator of possible archaeological survival is discussed in detail in section 5.2.

### 3.3 Modern impacts affecting archaeological survival

- 3.3.1 The existing building was constructed in the 1960s and has a large basement, occupying the entirety of the Site. Construction of the basement will have removed any archaeological deposits that were present. The basement floor level is recorded at 23.8m OD (4.0m below ground level (mbgl)), within a deeper area in the north-west of the Site with a basement floor level at 21.8m OD (6.0mbgl).

## 4 Archaeological and historical background

### 4.1 Overview of past investigations

- 4.1.1 One archaeological investigation has been undertaken on the Site. In December 2005, a watching brief was carried out (**DBA 1**): work on a new loading bay was monitored during the redevelopment of the underground car park. No archaeological remains were observed, and it was concluded that within its footprint the basement had already removed any archaeological remains previously present, down to natural deposits. The area of the watching brief is shown in Fig 3.
- 4.1.2 Within the 500m-radius study area, 11 archaeological investigations have taken place, and it is considered that the archaeology of the area is reasonably well understood. Most of these investigations recorded either no archaeological features or post-medieval remains of low significance (**DBA 1–4, 7–11**). One investigation recorded prehistoric remains (**DBA 5**). Medieval remains were recorded during one investigation (**DBA 6**).
- 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 given 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. A possible piece of Palaeolithic struck flint was recovered during a watching brief at University College Hospital (**DBA 5**), 120m south-east of the Site.
- 4.2.2 The Mesolithic hunter-gatherer 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.
- 4.2.3 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.
- 4.2.4 Two findspots of Neolithic polished stone axes are recorded in the study area: at Gower St University College Hospital Extension (**DBA 17**), 320m south-east of the Site, and at Gower Street (**DBA 19**), 450m south-east of the Site.
- 4.2.5 The Site appears to have been in an area that was not heavily exploited during the prehistoric period.

#### *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, 2.8km 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, 2000, 150).
- 4.2.7 The major Roman road from *Londinium* to the west was along the modern line of Oxford

Street, 1km to the south of the Site.

- 4.2.8 The only Roman evidence recorded in the study area is the findspot of seven incomplete pins of bone, an iron brooch and small fragment from a plate at 151 Great Portland Street (**DBA 18**), 400m south-west of the Site.
- 4.2.9 The Site was probably in fields or woodland away from known Roman settlements and roads.

#### *Early medieval 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 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.
- 4.2.11 In the 7th to 9th centuries the trading port of *Lundenwic* flourished 1.5km to the south-east of the Site, on the north side of the Thames in the area now occupied by Aldwych, the Strand and Covent Garden (Cowie and Blackmore 2008, xv). It was not until the late 9th century that the walled area of Roman *Londinium* was re-established as a burh (fortified settlement) during King Alfred's campaign against the Danish invasions.
- 4.2.12 In the 9th and 10th centuries, the Minster system began to be replaced by local parochial organisation, with formal areas of land and settlements served by a parish church.
- 4.2.13 The Site lay within the extensive manor of St Pancras. St Pancras Old Church lies beside the River Fleet (now underground) at the northern end of Pancras Road, c 1.2km to the north-east of the Site. The church was believed to have been founded on land given by King Ethelbert to St Paul's Cathedral in AD 604 (*VCH Middlesex* i, 122). Further evidence of an early Saxon date was also gained by the 1847 discovery of an altar stone, dated to the late 6th -early 7th century, beneath the 13th century tower of the church (Weinreb et al. 2008, 804). The church would have formed a focus for settlement, the exact location and extent of which is not currently known.
- 4.2.14 The main St Pancras manor was eventually broken up into smaller estates. The Site fell within the Tothele manor in the north-west, which Domesday Book (AD 1086) describes as containing 5 hides, enough woodland to support 150 pigs and herbage (vegetation used for pasture). The main settlement of Tothele is thought to have been located at the northern end of Tottenham Court Road, north of Euston Road, (**DBA 12**) c 80m to the east of the Site. A small quantity of Saxon pottery was found during an excavation on the Site of the manor house at 250 Euston Road (**DBA 6**). Despite the large size of the manor of Tothele the location of any other Saxon settlements is unknown.
- 4.2.15 Throughout this period the Site probably lay within open fields just to the west of the small settlement of Tothele.

#### *Later medieval period (AD 1066–1485)*

- 4.2.16 The manor of Tottenham was described in Domesday Book as a prebend of the Canons of St Paul's. The manor covered the majority of the western side of the parish (*Survey of London* xix). As mentioned above the main settlement was located at the northern end of the modern Tottenham Court Road, c 80m to the east of the Site.
- 4.2.17 The excavation at 250 Euston Road (**DBA 6**), 80m to the east of the Site, recorded remains associated with Tottenham Manor House. These comprised later medieval yard surfaces, a large latrine, remains of walls and a stone garderobe pit containing 16th century deposits.
- 4.2.18 No other later medieval remains have been recorded in the study area. The Site probably remained within fields just to the west of Tottenham Manor House throughout this period. However, it is likely that the construction of the existing basement has removed all archaeological remains of this period.

#### *Post-medieval period (AD 1485–present)*

- 4.2.19 A plan of Tottenham Manor of 1591 (Fig 4) shows the Site in a field to the west of the road from London to Hampstead. The manor buildings are shown to the east of the road. To the north-

west of the Site is an enclosed deer park, Marylebone Park, which eventually became Regent's Park.

- 4.2.20 Rocque's map of 1746 (Fig 5) shows the majority of the Site in fields. The southern part of the Site possibly extends into an estate comprising gardens or orchards.
- 4.2.21 By the time of Horwood's map of 1799 (Fig 6) the area of the Site had been developed. The central part of the Site is occupied by gardens. A number of small buildings are noted in the garden area. Terraced houses have been constructed along Brook Street in the west of the Site, Tottenham Court Road in the east of the Site and in the northern part of the Site.
- 4.2.22 Faden's 1813 revision of Horwood's map of 1799 (Fig 7) shows further development of the Site. Two new roads had been constructed: Henry Street in the northern part of the Site and Eden Street in the south-eastern part of the Site. Terraced houses have been constructed along both these new streets with open garden or yard areas to the rear. There is large building with a yard in the south-western part of the Site. The garden noted on the 1799 map has been removed.
- 4.2.23 The Ordnance Survey 1st edition 5ft:mile map of 1873 (Fig 8) shows that the Site is mostly comprised of terraced houses along Henry Street, Eden Street, Hampstead Road and Stanhope Street. There are small open yards across the Site. Two of the open areas are named: Cornelius Place and Bath Row. The map also noted the Site of Tottenhall Manor to the south of the Site, which is incorrectly located as older plans and archaeological evidence places the manor buildings to the east of Hampstead Road. The Ordnance Survey 2nd edition 5ft:mile map of 1896 (not reproduced) shows no changes to the Site.
- 4.2.24 The Ordnance Survey 3rd edition 25":mile map of 1916 (Fig 9) shows some minor changes to the Site. Some of buildings in the south-western part of the Site appear to have been amalgamated into larger buildings. Henry Street is renamed as Seaton Street.
- 4.2.25 The Site was heavily affected by bombing during World War 2, especially in the area of Eden Street. The London County Council Bomb Damage map (Fig 10) shows that a building on the south of Eden Street was totally destroyed (black). The remaining buildings around Eden Street are marked as being seriously damaged (red), suffering general blast damage (orange) or suffering minor blast damage (yellow).
- 4.2.26 The Ordnance Survey 1:1250 scale map of 1952 (Fig 11) shows the Site following World War 2. Demolished buildings are noted south of Eden Street and at the corner of Seaton Place and Hampstead Road. The map notes the large buildings in the south-western part of the Site as being a garage, a printing works and a warehouse.
- 4.2.27 The Site was redeveloped in the 1960s. The Ordnance Survey 1:1250 scale map of 1969 (Fig 12) shows the Site during construction. The previous buildings have been demolished and the outline of the Euston Tower is seen. To the south of the Site Euston Road has been widened, with construction of an underpass.
- 4.2.28 The Ordnance Survey 1:1250 scale map of 1982 (Fig 13) shows the Site following the completion of the redevelopment. Euston Tower is in the eastern part of the Site. A large square building extends into the south-western part of the Site and another large rectangular building extends into the north-western part of the Site. In the northern part of the Site are buildings of the Euston Centre. Beatty House extends into the north-eastern part of the Site.
- 4.2.29 The Ordnance Survey 1:1250 scale map of 2003 (Fig 14) shows that the large square building extends into the south-western part of the Site has been demolished, creating the open area of Regent's Place. The Site is unchanged to the present day.

## 5 Statement of significance

### 5.1 Introduction

- 5.1.1 This 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 This is followed by an assessment of the likely potential for archaeological remains to be present in the Site (high, moderate, low, or no potential if it is clear that any archaeological remains will have already been removed by past ground disturbance); and – in accordance with the NPPF (para 194–198, set out in full in Section 9.2.2 of this report) – a statement of the significance (high, medium, low, or negligible) of the known or likely remains in the Site. This is based on current understanding of the baseline conditions, past impacts, and professional judgement. The principles of Historic England guidance on the determination of the significance of heritage assets (EH 2008; HE 2017; see Section 10 of this report) have been applied, based on professional judgement for the consideration of non-designated archaeological assets.

### 5.2 Factors affecting archaeological survival

#### *Levels of natural geology, and past truncation*

- 5.2.1 Levels of natural deposits have been determined from the archaeological watching brief on the Site (**DBA 1**). Table 1 shows the results from the watching brief. No made ground was recorded, with the existing basement having truncated the natural gravels.

*Table 1: summary of geotechnical data (MoLAS 20051)  
Levels are in metres below ground level (mbgl)*

BH/TP ref.	Modern made ground	Undated made ground	Natural brickearth / gravel	Top of natural Clay
Triton Square WB (DBA 1)	–	–	4.8–5.6 (Top at 22.8m OD)	5.6 (Top at 22.0m OD)

#### *Past impacts*

- 5.2.2 The existing basement will have removed any archaeological remains within its footprint, to its formation level. Construction of the foundations of the previous buildings on the Site in the 18th and 19th centuries will have removed or truncated any earlier archaeological remains that were present other than isolated Palaeolithic stone tools within the underlying gravels.

#### *Likely depth and thickness of archaeological remains*

- 5.2.3 Any isolated stone tools would be at an unknown depth within the underlying gravels beneath the basement.

### 5.3 Archaeological potential, and significance of likely remains

- 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.

#### *Statement of Significance*

- 5.3.2 *The Site has a low to moderate potential for prehistoric remains.* The Lynch Hill gravels on which the Site is located are noted for occasional *in situ* Palaeolithic artefacts at depth within the fine-grained interglacial lenses, but their likely presence is very difficult to predict. Any

isolated stone tools within the gravels would be of low heritage significance, with evidential value.

- 5.3.3 *The Site has a low potential for remains from all other periods.* The Site is located away from areas of Roman settlement and Roman roads. Evidence of Roman activity in the study area is limited to one findspot. The Site is located 80m to the east of the early medieval manor of Totehele. However, early medieval remains associated with the manor are restricted to a small quantity of Saxon pottery found at 250 Euston Road. Any remains associated with the nearby manor will have been removed by the existing basement. There is no evidence for later medieval activity within the study area. The Site remained in fields just to the west of Tottenhall Manor. From available historic maps the Site was first developed in the late 18th century and was further developed through the 19th century. Any remains of these previous buildings will have been removed by the construction of the existing basement.



# 6 Impact of proposals

## 6.1 Proposals

- 6.1.1 The Proposed Development comprises redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building. Provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. Provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works (Fig 17).
- 6.1.2 The existing basement B1 (which covers the whole of the Site) would be retained and refurbished (Fig 18). The finished floor level (FFL) would be the same as exist at 23.8m OD (4.0mbgl) (Fig 20) with the slightly lower area in the north-west of the site at 21.8m OD (6.0mbgl). A new basement level B2, comprising an additional 246sqm of basement (below the existing) is proposed to accommodate a water tank and plant room, with a footprint c 34m by c 7m and excavated to a depth of c 8.5m (Fig 19). The FFL would be at 19.8m OD (8.0mbgl) (Fig 20).

## 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.

### *Basement B2 construction*

- 6.2.3 Any archaeological remains would be removed by the proposed lowering of the basement level within the footprint to a depth of 8.5mbgl, assuming a slab thickness of 0.5m. The only archaeological remains likely to be affected are limited to isolated Palaeolithic stone tools.

# 7 Conclusions

- 7.1.1 There are no designated heritage assets on the Site. The Site is not in a conservation area or an archaeological priority area.
- 7.1.2 Archaeological survival potential is low. Construction of the existing basement will have removed archaeological remains, other than possible isolated, prehistoric stone tools with the underlying gravels.
- 7.1.3 Any archaeological remains, i.e. isolated Palaeolithic stone tools, could be removed by the proposed excavation for basement level B2.
- 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)*

<b>Asset</b>	<b>Asset Significance</b>	<b>Impact of proposed scheme</b>
Prehistoric remains, of isolated Palaeolithic stone tools (Low to moderate potential)	Low	Excavation for basement level B2 Significance of asset reduced to negligible

- 7.1.5 In view of the generally low potential of the Site to contain significant archaeological assets, as set out in this assessment in accordance with the National Planning Policy Framework, it is unlikely that the London Borough of Camden’s archaeological advisor would request preliminary archaeological field evaluation of the Site. It is possible, however, that an archaeological watching brief would be required during ground reduction for the proposed basement level B2, which in accordance with the London Borough of Camden’s policies regarding archaeological heritage assets, would ensure that if such assets are affected they are not removed without record. Alternatively the archaeological monitoring of any preliminary geotechnical investigations could clarify the nature and depth of deposits, and based on the results no further work may be necessary. 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 grant of planning consent.

## 8 Gazetteer of known historic environment assets

- 8.1.1 The gazetteer lists known historic environment sites and finds within the 500m-radius study area around the Site. The gazetteer should be read in conjunction with Fig 2.
- 8.1.2 The GLHER data contained within this gazetteer was obtained on 17/02/2023 and is the copyright of Historic England 2023. The GLHER confirmed on 30/10/2023 that no further records had been added since February 2023.
- 8.1.3 Ordnance Survey data © Crown copyright and database right 2023. Historic England statutory designations data © Historic England 2023. The Historic England GIS Designations Data contained in this material was obtained in May 2023. The most up to date publicly available Historic England GIS Data can be obtained from <http://www.historicengland.org.uk>.

### Abbreviations

A&P – Arup and Partners

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

ELO – Historic England unique event identifier

GLCPC – Genius Loci Cultural Project Consultants

HER – Historic Environment Record

ILAU – Inner London Archaeological Unit

MoLAS – Museum of London Archaeology Service (now MOLA)

MLO – Historic England unique monument identifier

MHI – MOLA Headland Infrastructure

NHL – National Heritage List for England (Historic England)

DBA No.	Description	Site code/ HER/NHL No.
1	<p><b>Triton Square</b>  <i>Watching brief, MoLAS, 2005</i>                      An archaeological watching brief was undertaken on land adjacent to Triton Square, where a new loading bay was monitored. No archaeological deposits were encountered, as the current car park had truncated deposits in this area. Natural ground (brickearth) was encountered at 22.5m OD.</p>	RPL05 171293 ELO14977
2	<p><b>50 Triton Square, London</b>  <i>Evaluation, A&amp;P, 1995</i>                      Four machine dug trial pits were excavated under the supervision of an EH archaeology advisor. One hand dug trial pit was included for the recovery of soil samples for chemical contaminant testing. No soils or artefacts of archaeological interest were found during the evaluation and all pits contained 19th and 20th century fill sitting on brickearth or gravel in situ soils. This fill was associated with the walls and foundations of an old schoolhouse and factory. Therefore it was concluded that the site had a low archaeological potential and no further formal archaeological interventions will be necessary.</p>	154555 ELO1206
3	<p><b>178–182 Drummond Street, NW1</b>  <i>Evaluation, MoLAS, 1994</i>                      The evaluation revealed a natural feature thought to be a pond or steam channel cutting the gravels which were recorded at 25.80–25.97m OD. Sealing this were levelling dumps, wall foundations and a backfilled cellar from the 18th and 19th centuries.</p>	DRM94 160865 ELO3185 122849 146678 MLO59981– 2
4	<p><b>Regent's Place</b>  <i>Geotechnical Survey and evaluation, MoLAS, 2006</i>                      Eight trenches, eleven window sample holes and five cable percussion boreholes were excavated to provide geotechnical and archaeological information. No evidence of archaeological finds or features was recorded. Truncated natural gravel was recorded at around 25.53m OD. In places gravel was overlain by natural brickearth at around 27.46m OD. This was sealed by modern made ground and rubble levelling deposits. The contractor concluded that the construction of the existing buildings removed any archaeological deposits which may have existed on the site.</p>	EOL06 168463 ELO7173



DBA No.	Description	Site code/ HER/NHL No.
10	<b>30 Cleveland Street, W1</b> <i>Watching brief, GLCPC, 1999</i> This was requested as a result of bones being unearthed during the hand digging of geotechnical test pits. The site is located at the junction of Cleveland Street and Tottenham Street bounded to the north by Arthur Stanley House and to the west by Middlesex House. The watching brief consisted of the observation of one trench and a test pit. Some archaeological remains were revealed including animal bones, clay pipe stems, pottery sherds, oyster shells and ceramic building material. The pottery was dated to the late 19th Century and early 20th Century. The finds were mixed with modern debris and lay in disturbed deposit possibly the upper level of a domestic rubbish pit or midden.	153433 ELO1212 105628 151388 MLO75258 MLO75597
11	<b>Gordon Square</b> <i>Watching brief, DGLA, 1990</i> Recorded an irregular channel interpreted as a minor tributary of the River Fleet.	GOD90 109461 MLO25937
12	<b>Tottenham Manor</b> The Manor mentioned in Domesday as a Prebendal Manor of St Paul's. Tottenham manor was held in the medieval period by the Dean & Chapter of St Pauls Cathedral. At the Reformation it went to the Crown and by 1591 it was held by the Chief Cook to Elizabeth I and James I. The manor house was destroyed in 1808.	102338 104920 MLO17706 MLO17810
13	<b>St Anne's Roman Catholic Church (Late 20th Century Roman Catholic Church)</b> St Anne's Roman Catholic Church was commissioned in 1968 and built in 1970. The church ceased to be used for Catholic worship in the early 21st Century and after a period of disuse is now being used by a new congregation.	127304 MLO108289
14	<b>Munster Square (Edwardian Garden)</b> The area was originally surrounded by 19th century terraces and was planned by John Nash as an additional market to Regent's Park in the 1820s. In 1906 the garden was opened to the public with new walks and seats.	142425 MLO103801
15	<b>Society for the Promotion of Christian Knowledge (Post Medieval Burial Vault)</b> This is listed by Mrs. Holmes in her Appendix C as being a vault under the church used for interments. According to Holmes, there was no graveyard.	126471 MLO71158
16	<b>Fitzroy Square Gardens (Georgian Garden)</b> Fitzroy Square was laid out in 1790 as a circular garden. It was restored in 2008 by English Heritage.	108472 MLO103776
17	<b>Gower St, University College Hospital Extension (Neolithic Findspot)</b> The findspot of a Neolithic polished stone axe from the site of Shoolbreds (now University College Hospital Extension).	140497 MLO17838
18	<b>151 Great Portland Street (Roman Findspot)</b> The findspot of Roman items comprising seven incomplete pins of bone, an iron brooch and small fragment from a plate.	96147 96622 129817 MLO71751-3
19	<b>Gower Street (Neolithic Findspot)</b> The findspot of a Neolithic polished axe.	109063 MLO17760
20	<b>Euston Square (Early Medieval Findspot)</b> The findspot of a Byzantine gold ring set with a Solidus (coin), possibly of Theodosius II (402 AD–450 AD). It was found in 1880 in George St, Euston Square.	135332 MLO18046
21	<b>Euston Square Gardens (East and West) (Georgian Nursery)</b> The garden opened in 1837 at the site of Bedford Nursery Ground which had been built as a cattle route. The original layout was replaced in 1968.	110436 MLO103775
22	<b>St James's Gardens (Georgian Cemetery)</b> The area was originally a burial ground since 1788. In 1887 the area was laid out as a public garden and was re-landscaped by Camden Council during the 1980s.	136511 MLO103813 Basil Holmes ID 72
23	<b>Clarence Gardens (Georgian Nursery)</b> The public garden was opened in 1907. Previously the land had been used as a nursery ground during the 19th Century and John Nash originally had a plan in 1820 to develop the area into a market.	120237 MLO103770

DBA No.	Description	Site code/ HER/NHL No.
24	<p><b>Whitfield Gardens (Georgian Almshouse)</b>  <b>Tottenham Court Road (Post Medieval Cemetery)</b>  The site was once the site of a large pond. From 1756–58 it held a tabernacle and almshouse. It was also a burial ground until 1853. The site was opened as a public garden in 1895.  Holmes says that in 97 years upwards of 30,000 bodies were interred in this ground. In 1896 the ground covered less than 0.5 of an acre, and the Council had opened it as a public garden. The site is in two parts either side of the Congregational Church.</p>	100534 MLO103824 Basil Holmes ID 76
25	<p><b>Royal College of Physicians Medicinal Garden (Mid 20th Century Physic Garden)</b>  The Royal College of Physicians of London was founded in 1518; the present college dates from 1964, extended in 1996. Although there are some remnants from 1960s planting, the medicinal garden has been extensively replanted since 2005. It contains over 1000 different plants, arranged as a series of areas, including beds of medicinal plants from various cultures, plants with known medical value and those connected with physicians through the ages. There are mature London plane trees at the front, a sheltered south-facing lawn and beds to the rear. Eight gardens along St Andrews Place were planted in 2006/7 with box parterres containing plants from the 'Pharmacopeia Londinensis' published by the Royal College of Physicians in 1618.</p>	151570 MLO107472
26	<p><b>Cumberland Market (Georgian Icehouse)</b>  The area was originally a market that was planned by John Nash during the 1820s and was functioning by 1834. The market closed in 1926 and the gardens were refurbished. The ice-house beneath the market, supplied by boat from Norway, was filled in during the 1930s</p>	110482 MLO103772
27	<p><b>Numbers 63-68 and attached railings, 63-68, Warren Street</b>  Grade II listed terrace of 6 houses. Dated c 1792, restored c 1985.</p>	1379126
28	<p><b>Numbers 58-62 and attached railings, 58-62, Warren Street</b>  Grade II listed terrace of 5 houses. Dated c 1792, altered since.</p>	1379125
29	<p><b>56 Warren Street</b>  Grade II listed terraced house. Dated c 1792, altered since.</p>	1379123
30	<p><b>15 Warren Street</b>  Grade II listed terraced house, now a restaurant. Dated c 1792, altered since.</p>	1379110
31	<p><b>Numbers 16 and 17 and attached railings, 16 and 17, Warren Street</b>  Grade II listed two terraced houses. Dated c 1792.</p>	1379111
32	<p><b>Regent's Park</b>  Grade I Registered Park and Garden. Regent's Park (officially known as The Regent's Park), an early 19th century landscape park designed by John Nash as a setting for villa residences and subsequently, from 1835 onwards, opened as a public park. The grounds have seen continuous development into the late 20th century.</p>	1000246 114013 125530 MLO26111 MLO59219

# 9 Planning framework

## 9.1 National Planning Policy Framework

9.1.1 The revised National Planning Policy Framework (NPPF) was published in September 2023 by the Department of Levelling Up, Housing & Communities (DLUHC), and sets out the government's planning policies for England and how these are expected to be applied. This replaces the previous NPPF which was published in March 2012 with revisions in 2018, 2019, and 2021.

### *Conserving and enhancing the historic environment*

9.1.2 The NPPF section 16, "Conserving and enhancing the historic environment" is reproduced in full below:

**Para 189.** Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

**Para 190.** Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay, or other threats. This strategy should take into account:

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

**Para 191.** 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 192.** Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

**Para 193.** Local planning authorities should make information about the historic environment, gathered as part of policymaking or development management, publicly accessible.

### **Proposals affecting heritage assets**

**Para 194.** 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 195.** 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 into account when considering the impact of a proposal on a



heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

**Para 196.** 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 197.** In determining applications, local planning authorities should take account of:

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

**Para 198.** In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

### **Considering potential impacts**

**Para 199.** 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

**Para 200.** Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

**Para 201.** 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 total 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; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, 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.

**Para 202.** 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, where appropriate, securing its optimum viable use.

**Para 203.** 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 directly or indirectly affect 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 204.** Local planning authorities should not permit the 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 205.** Local planning authorities should 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.

**Para 206.** 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 the asset (or which better reveal its significance) should be treated favourably.

**Para 207.** Not all elements of a Conservation Area or World Heritage Site 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 200 or less than substantial harm under paragraph 201, 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 208.** 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.

- 9.1.3 It is considered that this assessment meets the requirements of the NPPF in providing sufficient and proportionate information about the heritage context of the Site, the significance of any heritage assets affected by the proposals, and the potential impact of the proposals on their significance.

## 9.2 Regional policy

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### *The London Plan*

- 9.2.1 The overarching strategies and policies for the whole of the Greater London area are contained within *The London Plan: The Spatial Development Strategy for Greater London* (GLA 2021), adopted in March 2021.
- 9.2.2 Policy HC1 “Heritage conservation and growth” of the *London Plan* relates to London’s historic environment.
- A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
- B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:
- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
  - 2) utilising the heritage significance of a site or area in the planning and design process
  - 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
  - 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.
- C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

- 9.2.3 Para. 7.1.8 adds 'Where there is evidence of **deliberate neglect** of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset should not be taken into account when making a decision on a development proposal'.
- 9.2.1 Para 7.1.11 adds 'Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains can be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.
- 9.2.2 It is considered that this assessment meets the requirements of the *London Plan* in providing sufficient and proportionate information about the heritage context of the Site, the significance of any heritage assets affected by the proposals, and the potential impact of the proposals on their significance. Any harm to buried heritage assets would be offset by archaeological investigation and recording under a planning condition, with the results disseminated for public benefit.

## 9.3 Local planning policy

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- 9.3.1 The London Borough of Camden's Local Plan was adopted in July 2017. Policy D2 covers Heritage.

### **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.

- 9.3.2 It is considered that this assessment meets the requirements of the London Borough of Camden's Local Plan regarding non-designated archaeological assets in providing sufficient and proportionate information about the heritage context of the Site, the significance of any heritage assets affected by the proposals, and the potential impact of the proposals on their significance. Any harm to buried heritage assets would be offset by archaeological investigation and recording under a planning condition, with the results disseminated for public benefit.

## 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 Consultation on draft revisions to the original *Conservation Principles* document which set out the four values was open from November 2017 until February 2018. The revisions aim to make them more closely aligned with the terms used in the NPPF (which are also used in designation and planning legislation): i.e. as archaeological, architectural, artistic and historic interest. This is in the interests of consistency, and to support the use of the Conservation Principles in more technical decision-making (HE 2017).

10.1.3 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

10.1.4 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 (e.g. 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 (e.g. 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 'to document buildings, or parts of buildings, which may be lost as a result of demolition, alteration or neglect', 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>Desk-based 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>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 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 county 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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3XN, Dwg. ET-DR-A-20100, Rev. –, 22/09/2023

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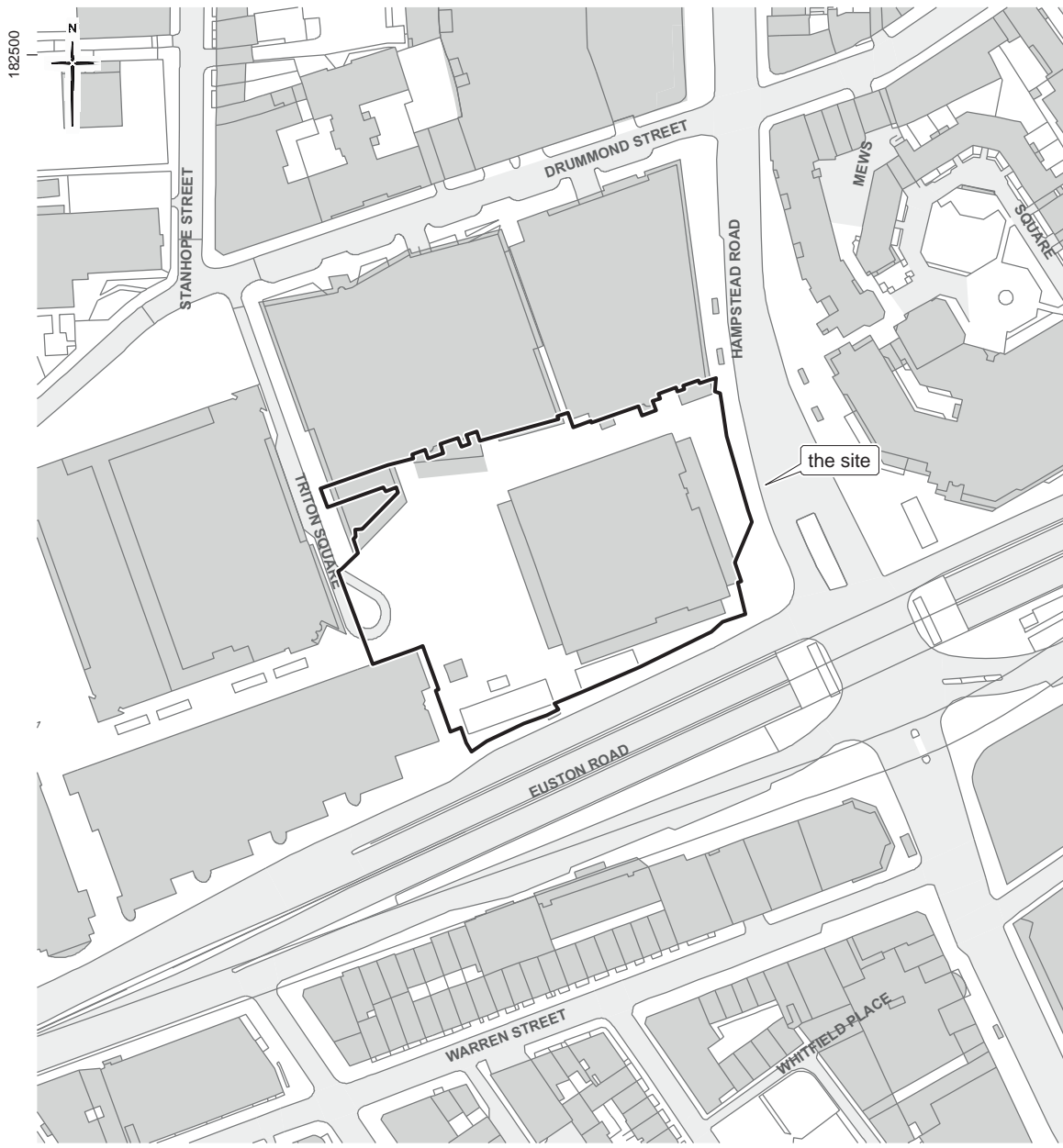
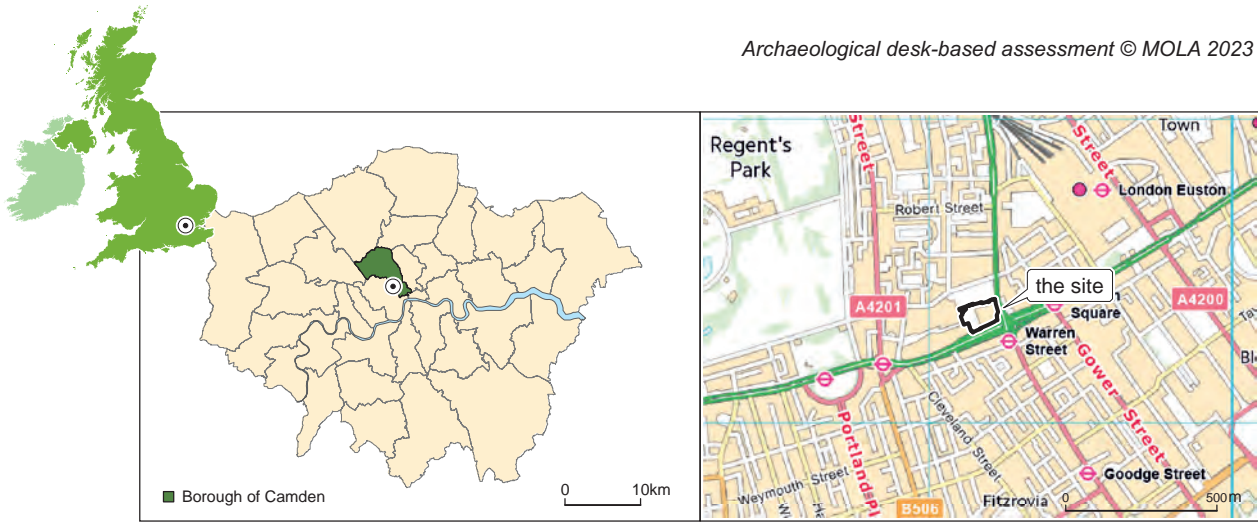
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Plowman Craven, Dwg. GPR scanning of Basement Wall, Rev A, 09/12/2019

## 13.4 Available site survey information checklist

Information from client	Available	Format	Obtained
Plan of existing site services (overhead/buried)	N		
Levelled site survey as existing (ground and buildings)	Y	pdf	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	N	N	



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scale 1:2,000 @ A4

0 75m

Fig 1 Site location



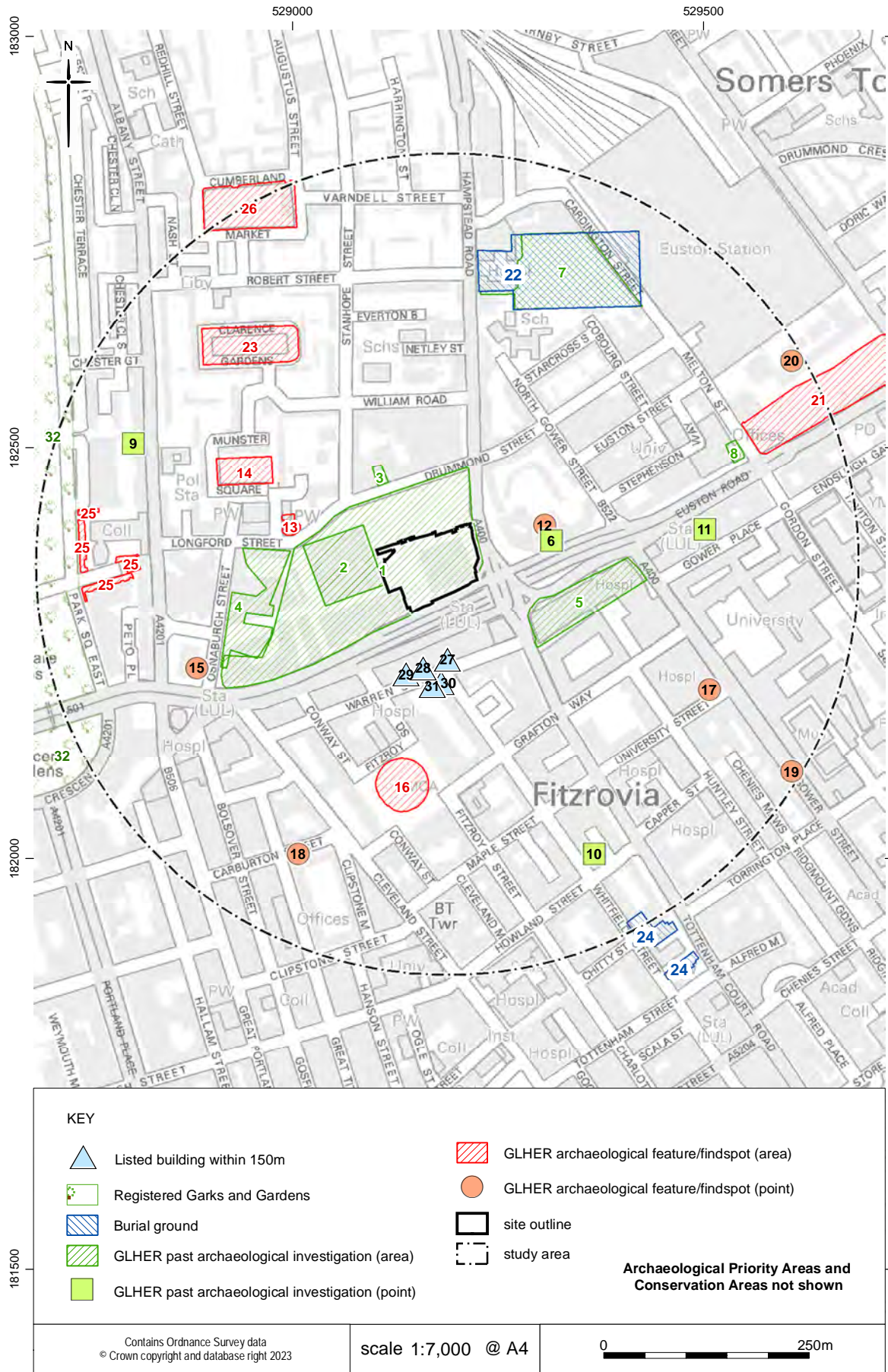
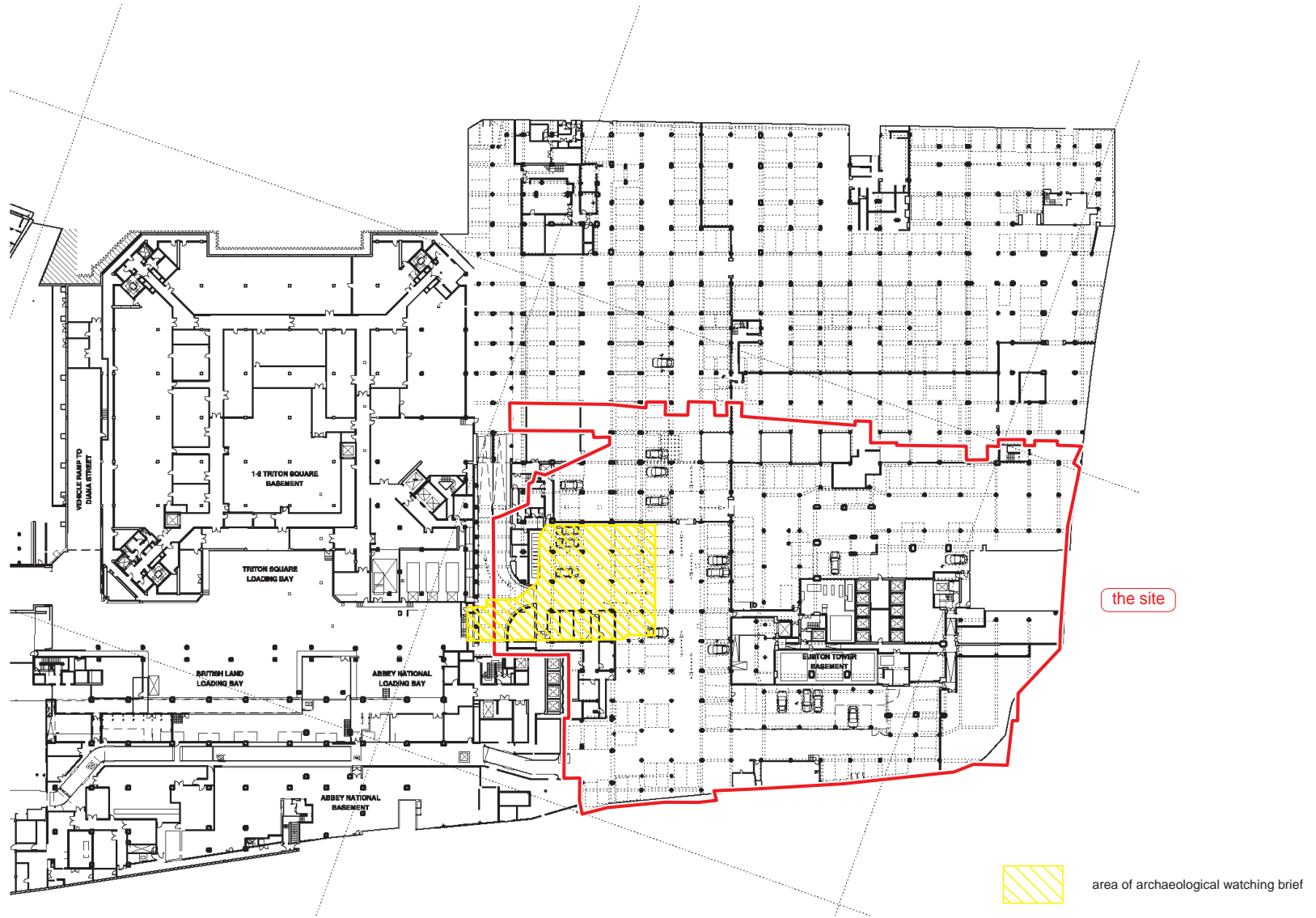


Fig 2 Historic environment features map



CAM/D2047/DBA/23#03

Archaeological desk-based assessment MoLA 2023

Fig 3 Location of the 2005 watching brief (MoLAS 2006, Fig 2)



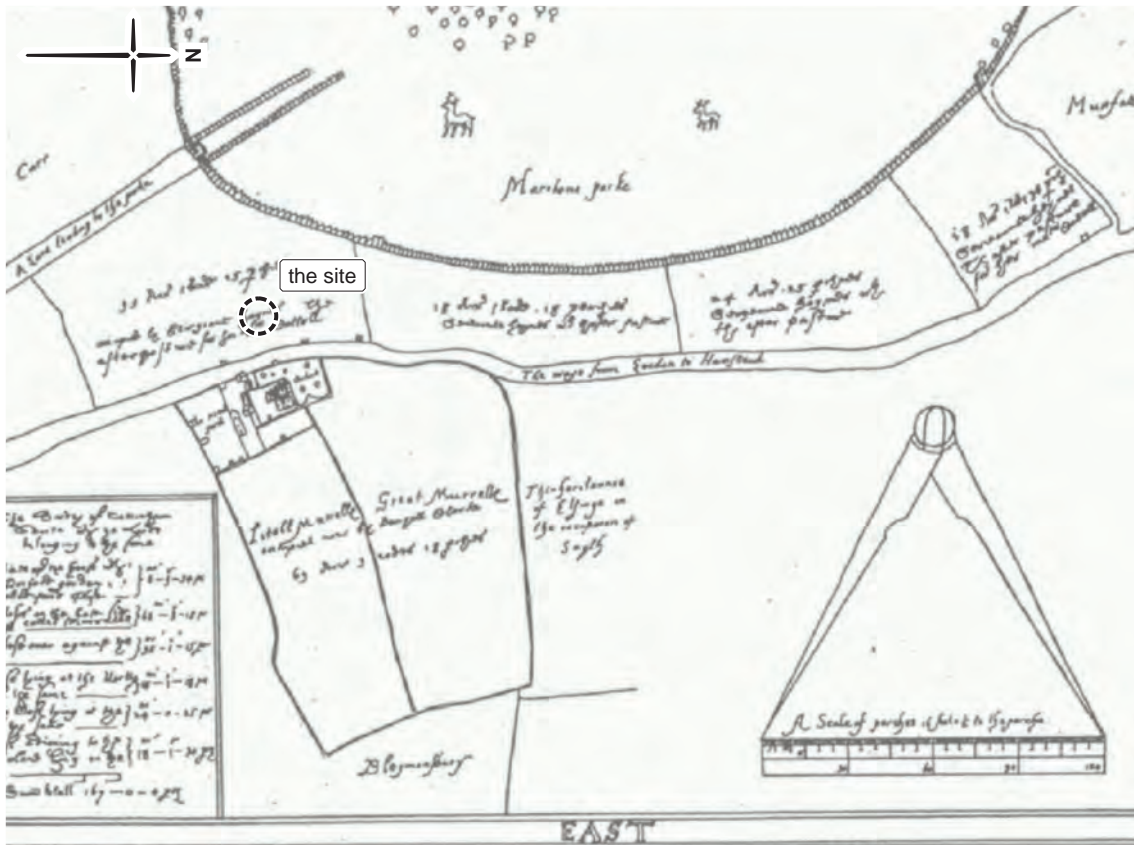


Fig 4 Plan of Tottenhall Manor of 1591

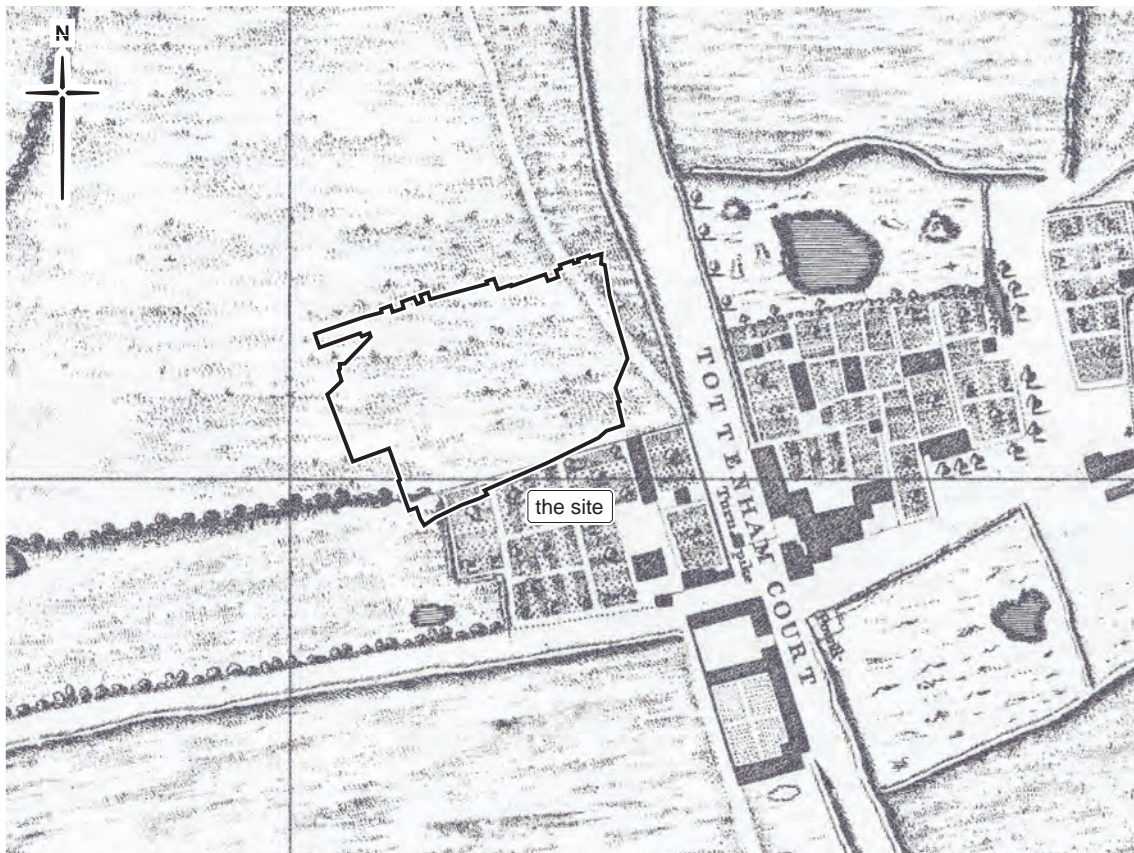


Fig 5 Rocque's map of 1746



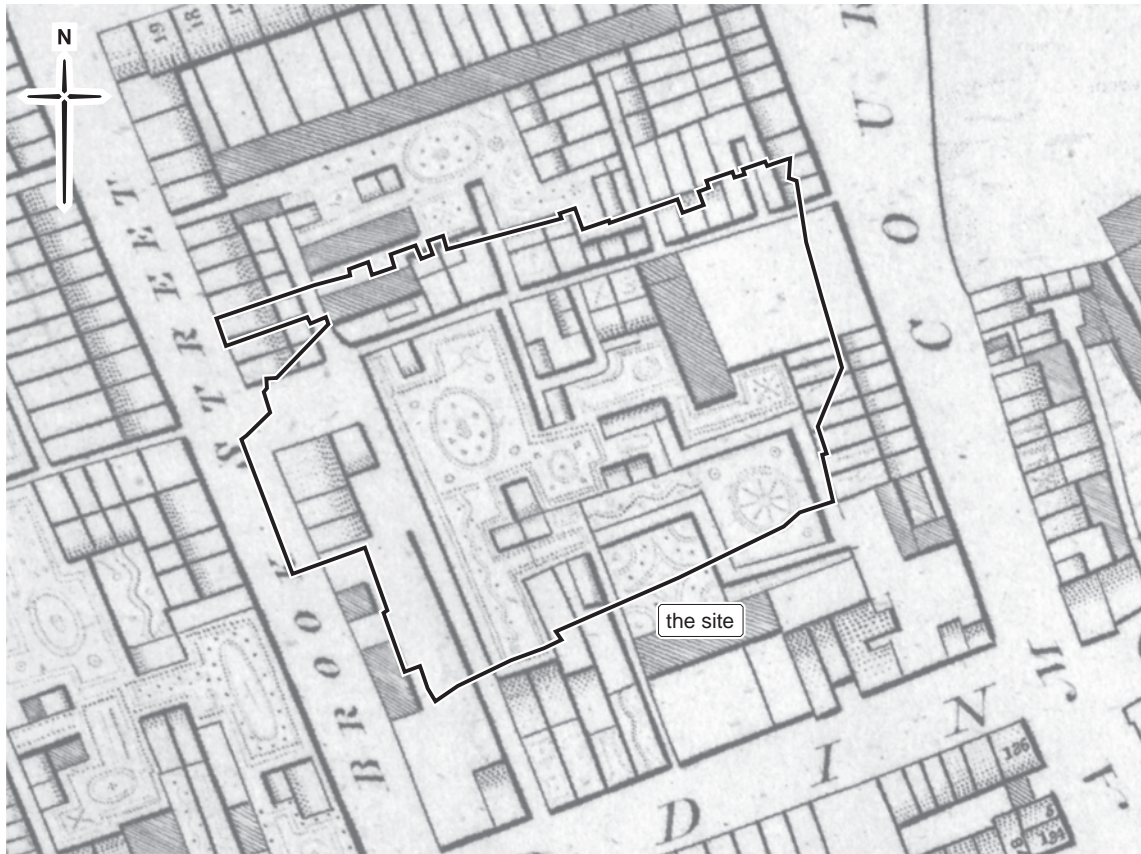


Fig 6 Horwood's map of 1799



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



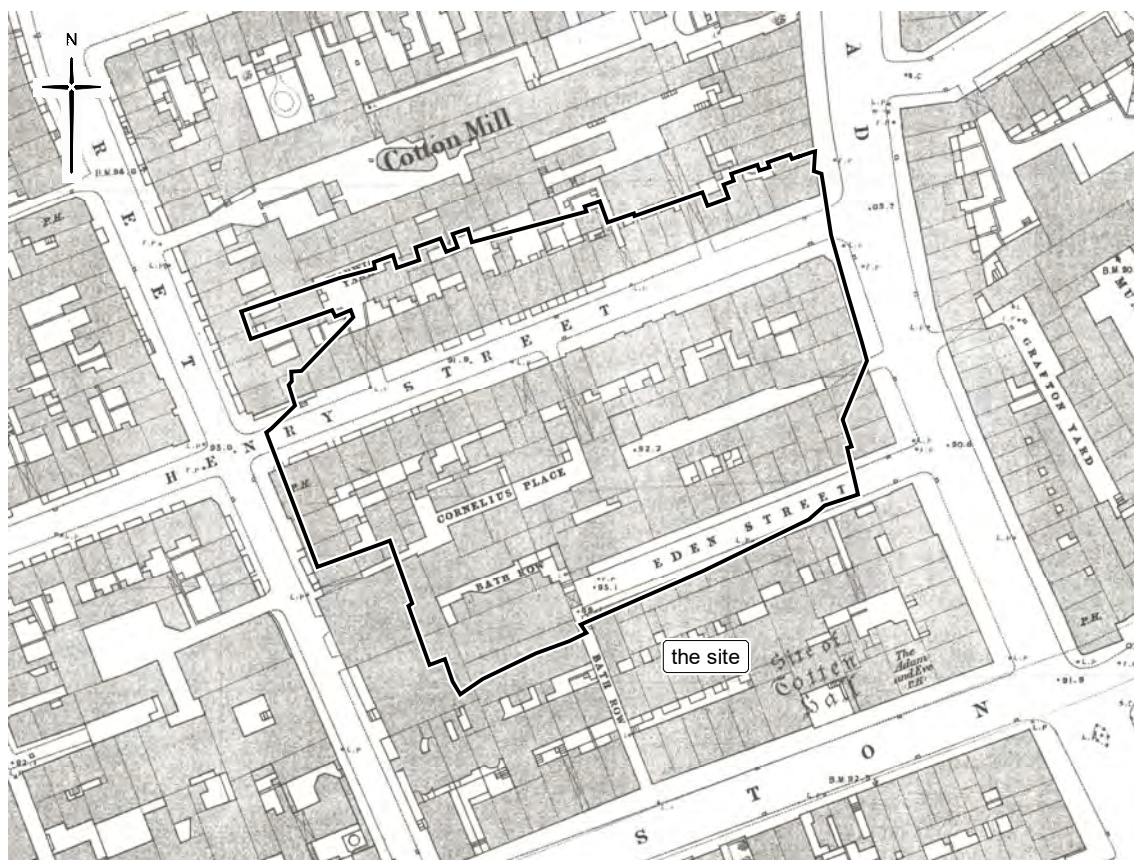


Fig 8 Ordnance Survey 1st edition 5ft:mile map of 1873 (not to scale)



Fig 9 Ordnance Survey 3rd edition 25":mile map of 1916 (not to scale)





Fig 10 London County Council Bomb Damage map



Fig 11 Ordnance Survey 1:1250 scale map of 1952 (not to scale)



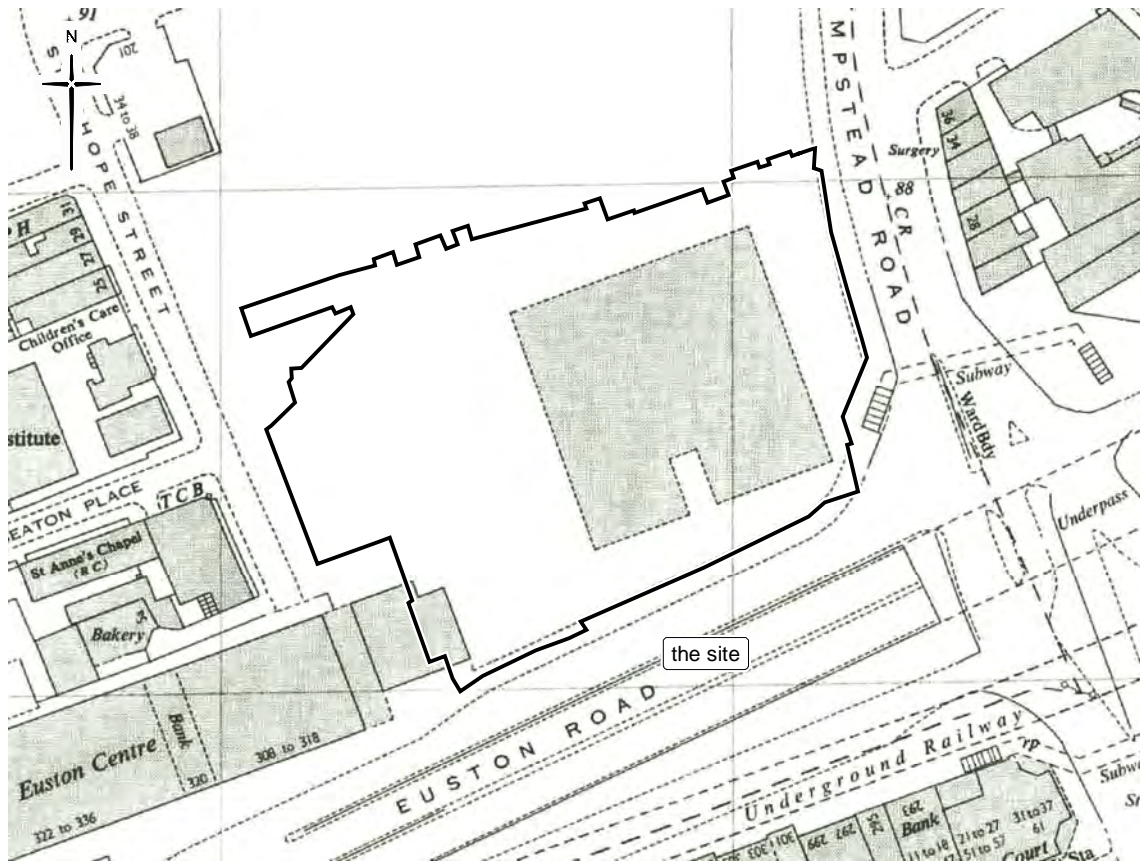


Fig 12 Ordnance Survey 1:1250 scale map of 1969 (not to scale)

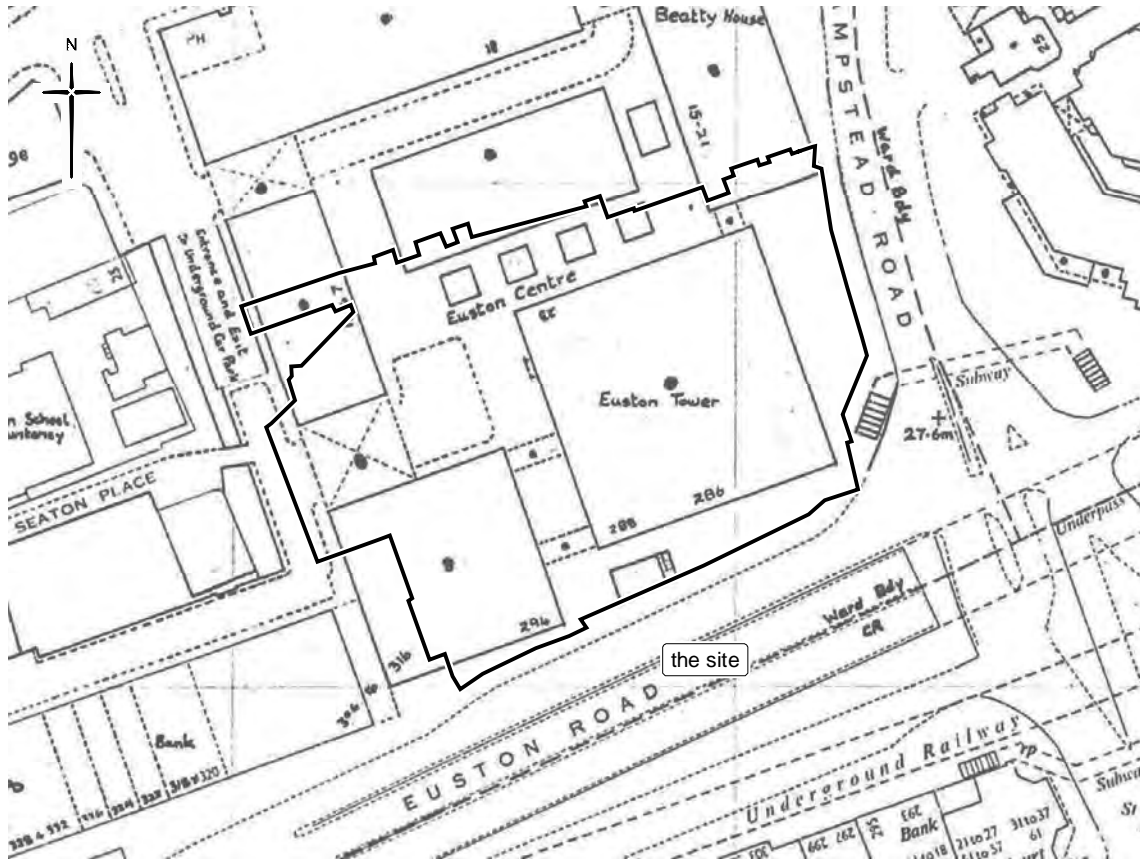


Fig 13 Ordnance Survey 1:1250 scale map of 1982 (not to scale)



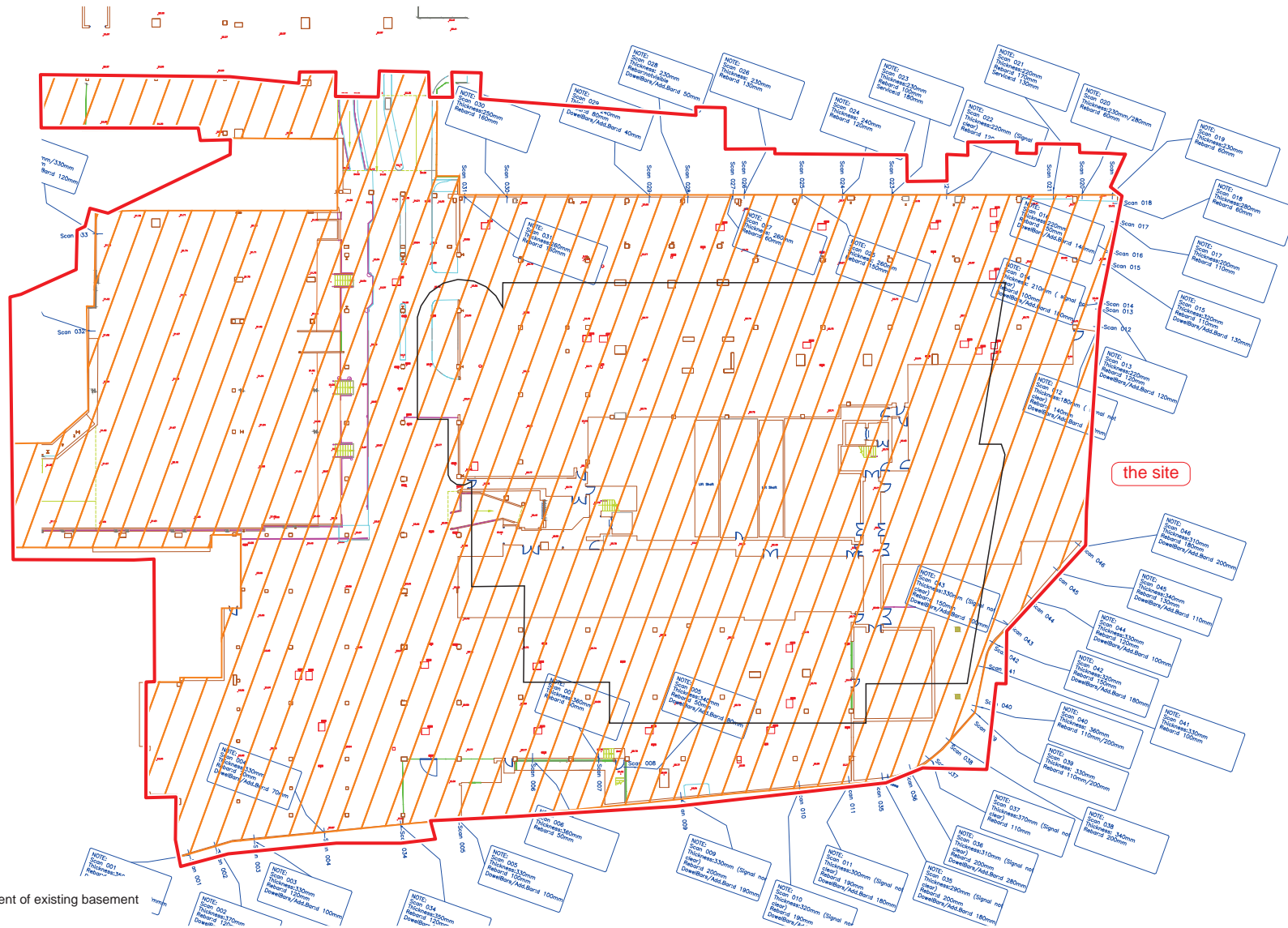
Fig 14 Ordnance Survey 1:1250 scale map of 2003 (not to scale)





CAM/D2047/DBA23#15

Fig 15 Existing ground floor plan (3XN, Dwg. ET-DR-A-00100, Rev. -, 29/09/2023)



CAMD2047DBA23#16

Fig 16 Existing basement plan (Plowman Craven, Dwg. GPR scanning of Basement Wall, Rev A, 09/12/2019)



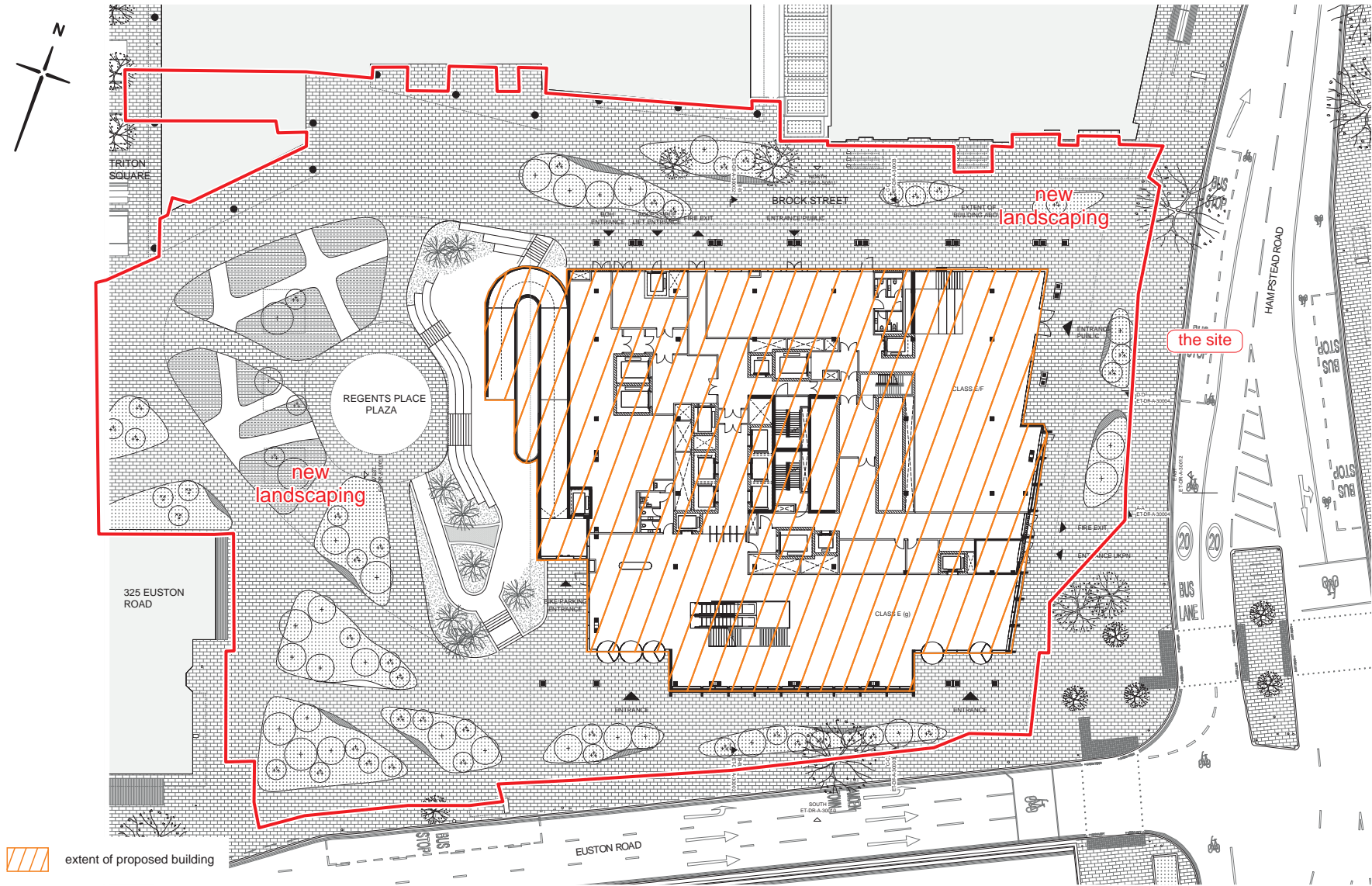
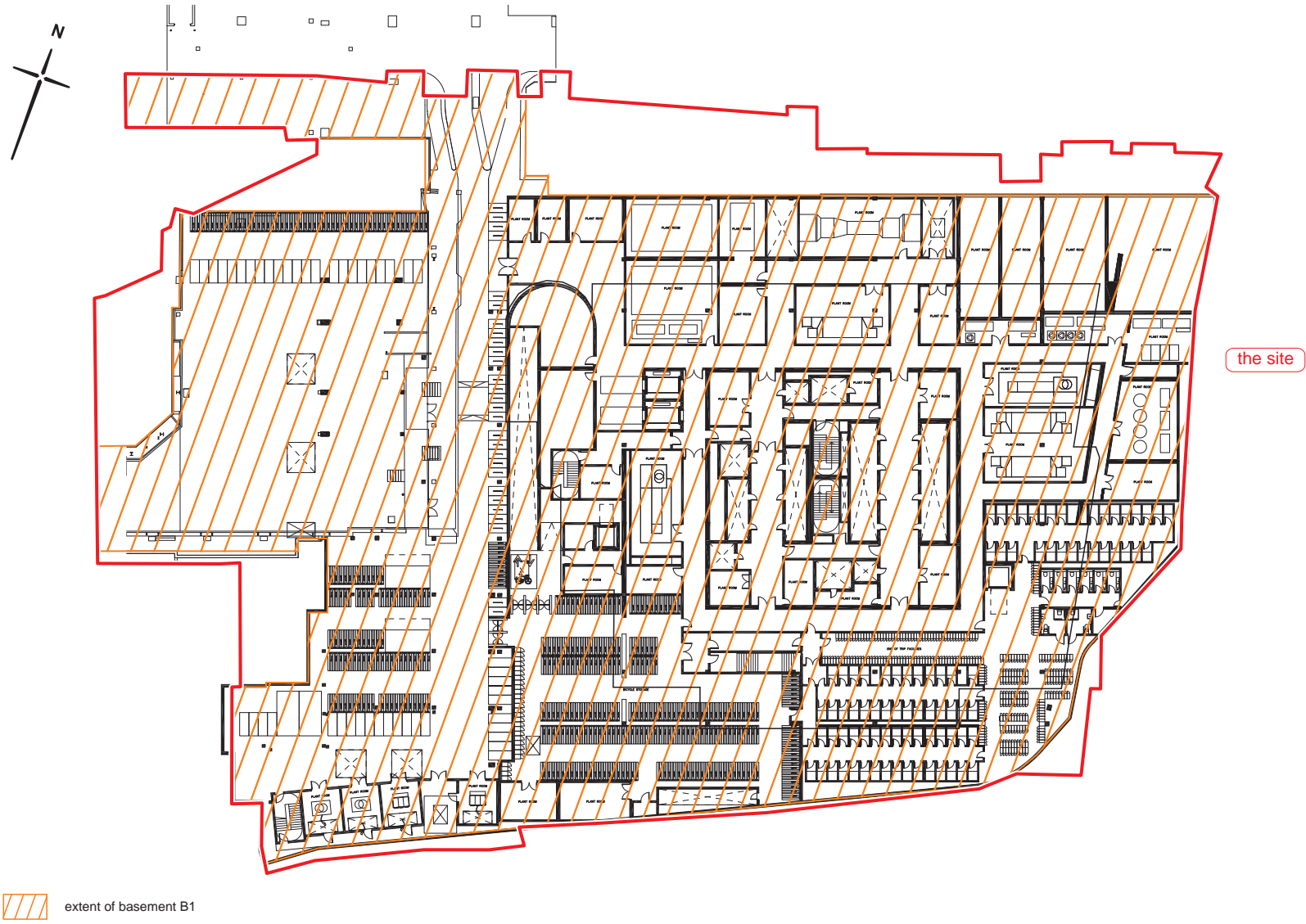


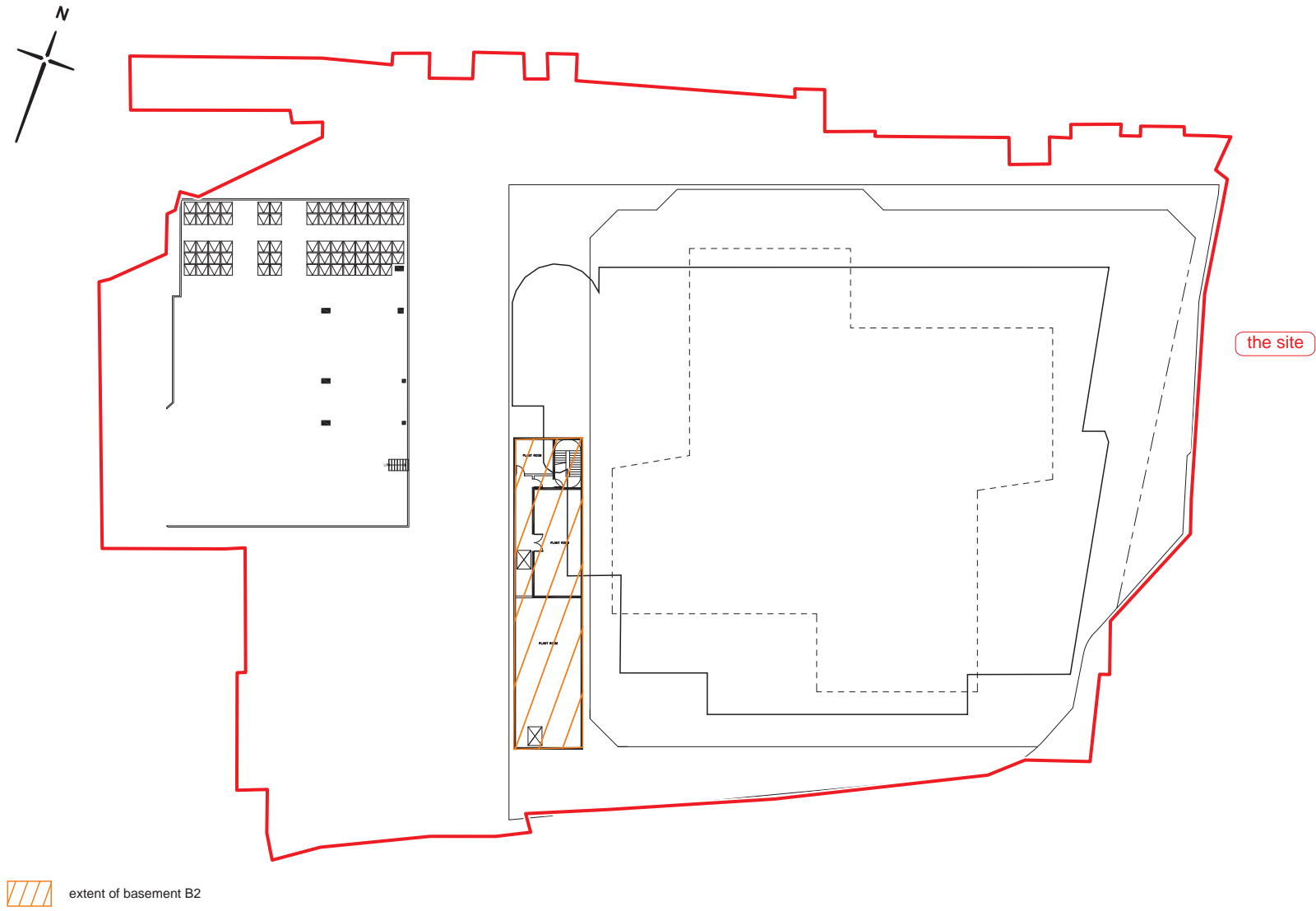
Fig 17 Proposed ground floor plan (3XN, Dwg. ET-DR-A-20100, Rev. -, 22/09/2023)



CAM/D2047/DBA23#18

Fig 18 Proposed basement 01 plan (3XN, Dwg. ET-DR-A-20099, Rev. -, 22/09/2023)





CAMD2047DBA23#19

Fig 19 Proposed basement 02 plan (3XN, Dwg. ET-DR-A-20098, Rev. -, 22/09/2023)

