



lpaburystreet@cityoflondon.gov.uk

21 March 2024
Crossrail Ref: CRL-IP-3125

Transport for London
Crossrail
Safeguarding
5 Endeavour Square

Dear Anna Tastsoglou,

24/00011/LBC : 1-4, 31-34 Bury Street, London, EC3A 5AR

Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter 14 March 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:

CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik

Safeguarding Officer (Elizabeth line)

CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team

Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

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Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

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The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).



Historic England

Anna Tastsoglou
PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00011/LBC
Our Ref: 220216

Contact:
Helen Hawkins
02079733223
helen.hawkins@historicengland.org.uk

2nd April 2024

Dear Anna,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021**

Holland House 1 - 4, 32 Bury Street London EC3A 5AW

Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works

Recommend Archaeological Condition(s)

Thank you for your consultation received on 14th March 2024.

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

Assessment of Significance and Impact



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The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

The site lies in an area which was formerly within the walls of the Roman city of Londinium. A large Roman ditch was identified to the west of the site at St Mary Axe and a Roman road was identified to the south of the site, both of which are likely to have continued through the site. Roman buildings have also been identified close to the site. The Augustinian Holy Trinity Priory (founded 1108) was formerly located partially within the east of the site. The site was occupied by a series of buildings during the post-medieval period, including a school.

All three of the current buildings on the site have a basement. The deepest basement appears to be under Holland House although no OD height has been provided for it. Shallower basements appear to be present beneath Bury House and Renown House. The archaeological desk based assessment (AOC 2023) submitted with the application suggests that the Bury House basement has removed all archaeological deposits to a depth of c 11m OD. No depth for the basement of Renown House has been provided but a similar level of impact may be expected. Remains of the Abbey previously excavated to the east of the site have confirmed that the lower parts of the Abbey remains extend to below 11m OD in places. It is also possible that deeper cut features of Roman date may also survive beneath the current basements. No archaeological evaluation or investigation has been previously carried out on the site to ascertain likely levels of truncation.

The proposed development includes a basement under Bury House that will extend to four levels. This will cause complete truncation of any surviving archaeological deposits. In Holland House, no new basements are proposed but a crane base and new foundation will be inserted into the current lightwell. Renown House will retain its facade, which is likely to need propping. The supports for the propping are likely to extend below the current basement. Underpinning may also be required here.

It is therefore possible that remains of Roman and medieval date survive on the site, although remains of high significance are not expected due to truncation from the current buildings. The proposed development will have a high impact on these potential remains. It is therefore recommended that an archaeological evaluation take place, if consent is granted, in order to establish the nature and extent of archaeological survival. In the first instance, geotechnical investigations should be monitored by an archaeologist as they are carried out. If archaeological remains are encountered, a full programme of archaeological mitigation, which covers all below ground impacts should be carried out.



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A cultural and education space is to be provided within the proposed development. The archaeological work should therefore include public engagement to feed into the cultural and education programme for the site. The story of Holy Trinity Priory is of particular interest as little information about this site is available to view within the City.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 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.

Recommendations

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:

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

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



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take place other than in accordance with the agreed stage 2 WSI which shall include:

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

Informative Written schemes of investigation will need to be prepared and implemented by a suitably 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 211.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

Archaeological monitoring of geotechnical pits and boreholes can provide a cost-effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk-based assessment or field evaluation.

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial



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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.

Public engagement

Where appropriate, local planning authorities and the developer are advised to make investigative works open to and interpreted for the public and to include that as part of the WSI. Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may be communicated, in addition to formal publication and deposition of the archive, through displays, exhibitions and popular publications and might inform site design and public art.

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

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



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