



Historic England

Mr Philip Elliott
Royal Borough of Kensington and Chelsea
The Town Hall
Hornton Street
London
W8 7NX

Your Ref: HGY/2023/0261
Our Ref: 212746

Contact:
Adam Single
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2023-02-23

Dear Mr Elliott,

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

Berol Quarter, Ashley Road, London N17 9LJ

Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.

Recommend Conservation Officer comments on loading hoist and refurbishment
Recommend Archaeological Condition
Advise scope for public realm heritage interpretation

Thank you for your consultation received on 2023-02-03.

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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Berol House and No.1 Berol Yard underwent historic buildings recording as a condition of the 2017 consent for conversion. The surviving loading hoist on the second floor of the south wing was identified as a significant feature.

I recommend that the borough Conservation Officer's views be sought on the principle of the proposed impact on the historic fabric and the future of the loading hoist. I also recommend that the LPA secure measures for the public interpretation of the site's industrial history in an approved scheme, as encouraged by the London Plan. I would be pleased to advise the LPA further on this.

The site lies in an Archaeological Area identified in the council's 2021 exercise but I understand this work awaits adoption by LPA. I was not able to find an archaeological desk-based assessment accompanying the application.

However from a brief examination of superseded Ordnance Survey mapping, the site of the proposed new build appears largely undeveloped in the modern era. Its Enfield Silt geology preserve prehistoric and later activity elsewhere in the borough, including just to the south at Ferry Island and North Island. The First Edition OS shows a possible fossilised linear route, preserved as a parallel field boundaries and planting, crossing the site from Hale Farm which lies under Down Lane Recreation Ground, down to the Lea.

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

NPPF paragraphs 190 and 197 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 205 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



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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 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



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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 205.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Refer to Conservation Officer

As this proposal may affect a heritage asset of architectural, artistic or historic interest so recommend that you seek the advice of your conservation officer.

Public engagement

A scheme of London Plan-compliant public heritage interpretation in public realm would be appropriate, secured through s106 and or design measures. I would be pleased to advise the LPA further on the industrial archaeological aspects of this

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

Adam Single

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

Cc: Ms Elisabetta Tonazzi. LB Haringey Conservation team



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