



Historic England

Ms Emily Whittredge
Planning Regeneration & Economy
Level 6 River Park House
Wood Green N22 8HQ

Your Ref: HGY/2023/0541
Our Ref: 213547

Contact:
Helen Hawkins
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24th March 2023

Dear Ms Whittredge,

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

Land South of Holy Trinity Church, Philip Lane, Tottenham, London, N15 4GZ

Proposed extension to create new cafe space and external seating

Recommend Archaeology Condition(s)

Thank you for your consultation received on 15th March 2023.

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

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77574] Tottenham Medieval Settlement

The site is located in the Tottenham Medieval Settlement Archaeological Priority Area. The APA has been classified as Tier 2 as it has the potential to contain below ground



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archaeological deposits relating to early medieval, medieval and post-medieval settlement, including burials. The presence of the Roman road highlights a further potential for archaeological remains relating to the road and Roman roadside activities within the APA. The proposed extension is located in the former open area surrounding the church. It is unclear from historic maps whether this area was used as a graveyard or simply open space, prior to the current buildings being constructed as a school. Even if burials were never present on the site, it retains an archaeological potential as it is located in the heart of the medieval settlement at High Cross.

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

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

I therefore recommend attaching a condition as follows:

- Condition No demolition or development shall take place until a 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, which shall include the statement of significance and research objectives, and
- A. 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.



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This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited 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 205.

I envisage that the archaeological fieldwork would comprise the following:

Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

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

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



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