



Historic England

Mr Samuel Uff
London Borough of Haringey
Level 6
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225 High Road
Wood Green
N22 8HQ

Your Ref: HGY/2023/2137
Our Ref: 216158

Contact:
Adam Single
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Dear Mr Uff,

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

Tottenham Hotspur Stadium, 748 High Road, Tottenham, London N17 0AL

Minor Material Amendments to height, design, maximum floorspace and associated works to Plot 3 (Hotel / Residential development) of the hybrid planning permission HGY/2015/3000 (following previously approved amendments including HGY/2017/1183 to allow part residential (C3) use on Plot 3) for demolition and comprehensive redevelopment of the Northumberland Park Development Project through variation of Conditions A4 (Consented Drawings and Documents); A6 (Conformity with Environmental Statement) and Condition A7 (Maximum Quantity/Density) and D1 (Plot 3 specific drawings) under Section 73 of the Town and Country Planning Act

Recommend Archaeology Condition(s)

Thank you for your consultation received on 2023-08-18.

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.



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Assessment of Significance and Impact

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77751] The Lea Valley

The site lies on the short connecting route between the Ermine Street Roman road corridor and the Sutherland Road moated site. Mediaeval buildings were identified by fieldwork in the late '90s at 71 St Pauls Road, 300m east

I understand that the 2015 Tottenham Stadium consent included a planning condition (C12) for an archaeological watching brief.

A submission was made to discharge this condition under HGY/2016/2079, but the submission as represented on the LPA's website appears to have comprised a television reception impact mitigation strategy, rather than a written scheme of investigation for archaeological monitoring.

GLAAS had discussion in June 2016 with the applicants' archaeological consultants about the nature of the required archaeological work, and apparently sought additional information, but I have no further record of correspondence on file at Historic England.

I understand that possibly as a result of confusion, no further archaeological work took place in connection with the 2015 scheme and no programme of archaeological monitoring was approved by the LPA as the consent intended.

I recommend that a new archaeological condition for a watching brief be appended to any new consent.

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.



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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. 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



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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

Adam Single

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



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