



Historic England

Ms Sarah Madondo
London Borough of Haringey
By email

Your Ref: HGY/2023/0464
Our Ref: 214441

Contact: Valeria Powell
07443 316 448
Valeria.Powell@historicengland.org.uk

13 May 2025

Dear Ms Madondo,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2024**

Former Car Wash, Land on the East Side of Broad Lane, London N15 4DE
Construction of a new office block, including covered bin and cycle stores.

Recommend Archaeological Condition

Thank you for your consultation received on 05 May 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: [77751] The Lea Valley.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

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The floodplain of the River Lea has been a focus of activity since the prehistoric period and accordingly it has the potential to contain archaeological remains from all periods. The site is less than 0.5km from Welbourne, a recently excavated nationally significant Mesolithic flint working site where remains were found in brickearth. The Enfield Silt brickearth deposit and Kempton Park gravels were recorded at heights which broadly correspond to those in the topographical survey submitted with the application.

As well as the site's prehistoric potential, it is located on Broad Lane which has been established as a route since at least the medieval period. The channels of the River Lea have been utilised for transportation and to power industry since then, and evidence of this activity could contribute to our understanding of the industrial use of the river through time, as well as its use as a communication and transport link between London and the surrounding area.

The site is shown on historic maps as open fields until the mid-20th century, at which point it was developed for light industry. Given the relative lack of development on the site and the height and massing of the proposed development, the substantial foundations and groundworks involved are likely to cause harm to any surviving archaeological resource.

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

NPPF paragraphs 202 and 210 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 218 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



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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 two (2) conditions as follows:

Condition 1 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.

Condition 2 No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.



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These pre-commencement conditions are 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 these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 218.

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.

Geoarchaeological Coring

Coring can assist in a variety of situations to map stratigraphy (borehole surveys) and collect samples. It is mainly undertaken when the deposits of interest are too deep for conventional digging, or when large areas need to be mapped. In developer-funded evaluations, borehole surveys should not be seen as a replacement for conventional trench evaluation, but they can be used as a first phase where the results need to characterise the local sedimentary sequence and help pinpoint trench locations. This technique is also very helpful in establishing the presence of waterlogged deposits with potential for palaeoenvironmental evidence (see also Hydrological impact assessment).

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.

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



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

Yours sincerely

Valeria Powell

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



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