



Historic England

Ms Elaine Quigley  
London Borough of Camden  
5 Pancras Square  
London  
N1C 4AG

Your Ref: 2023/1630/P  
Our Ref: 215958

Contact:  
Ms Johanna Short

Johanna.Short@HistoricEngland.org.uk

2023-08-17

Dear Ms Quigley,

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

**Heath House North End Way London NW3 7ET**

*Variation of condition 11 (Approved plans) of planning permission 2012/5432 dated 05/11/2012 (as amended by approval ref 2018/4796/P dated 12/11/2021) for Demolition of garage block and erection of new west side wing comprising basement, lower ground, ground and 1st floors including double garage; erection of rear ground floor conservatory extension; remodelling of roofs of main house and east side wing; various external alterations; and associated landscaping including new walled courtyard to rear of garage wing namely to consolidate all the above permissions into one comprehensive planning permission.*

**Recommend Two Archaeological Condition(s)**

Thank you for your consultation received on 2023-08-09.

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 planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [101723] Hampstead Heath, including West Heath (Medieval Meadow)

The Historic Environment Assessment (MOLA, October 2015) previously submitted, identified a potential for prehistoric remains to be present within the site. Evidence of prehistoric activity has also been identified in various other locations across the heath: To the east and north of Parliament Hill, is a Bronze Age Barrow (a Scheduled Monument) while to the west, evidence of Mesolithic occupation has been recorded. Closer to the application site (on the site of Jack Straw's Castle) is an earthwork thought to be prehistoric in date.

In terms of the potential impact of the scheme on archaeological deposits that may survive within the application site, I refer to our previous advice letter, dated 10 December 2015 (22015/6280/P), in particular our comments relating to the proposed additional basement and lower ground floor levels and associated car parking facility. Our view remains that, although the existing building will have affected the archaeological survival within its footprint, the proposed extensions, which include basement and lower ground floor levels, a double garage and rear conservatory, will impact areas which have undergone little prior development.

### 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

#### *Archaeological Evaluation*

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 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.

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.

## *Historic Building Recording*

Historic building recording is an investigation to establish the character, history, dating, form and development of a historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes place. The outcome will be an archive and a report which may be published.

Since built heritage assets on this site will be affected by the development, I would also recommend that the following condition is applied, in line with our previous advice:

**Condition 2** No demolition shall take place until a written scheme of historic building investigation (WSI) has been submitted to and approved by the local planning authority in writing. For buildings that are 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 historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. 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 heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

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

Ms Johanna Short

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



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