



Historic England

Polly Davidson
London Borough of Sutton
Development Management
24 Denmark Road
Carshalton
SM5 2JG

Your Ref: DM2023/00094
Our Ref: 215231
LAG/029/0486-01
Contact: Mark Stevenson

2023-06-26

Dear P Davidson,

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

93 Epsom Road Sutton SM3 9EY

Demolition of the existing detached house and erection of two semi-detached two-storey dwellings with two garages at the rear and a vehicular access from and to Elm Road West.

Recommend Archaeology Condition(s)

Thank you for your consultation dated 2023-06-22.

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 application site is located within an Archaeological Priority Area as defined by borough policy that denotes the line of the former Roman period road, Stane Street. There is therefore potential for evidence of the road and or roadside activity.

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



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

Recommendation

It is noted that despite the site being within an Archaeological Priority Area, it would appear an archaeological desk-based assessment has not been prepared and submitted as part of the application documentation. However, given the limited nature of the proposed development, it is concluded that the o-going archaeological interest can be secured by condition.

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:

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|-------------|---|
| 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 <ol style="list-style-type: none">A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed worksB. Where appropriate, details of a programme for delivering related positive public benefitsC. 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



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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:

Archaeological Watching Brief

It is recommended that the reasonable and proportionate archaeological response can be achieved through a pro-active Watching Brief. Pro-active means that the ground disturbance work will be undertaken under the direction of the developer appointed archaeologist until the archaeological interest has been satisfied. A suitable WSI will need to be submitted and approved before any ground disturbance work occurs.

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

Mark Stevenson
Archaeology Advisor
Greater London Archaeological Advisory Service
London and South East Region



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