



Historic England

Mr Ian Smith
London Borough of Bexley
Planning and Development
Department,
Bexley Civic Offices,
Broadway
Bexleyheath
London
DA6 7LB

Your Ref: 19/03072/FULM
Our Ref: CLO30657
003/0429-01
Contact: Mark Stevenson
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05 February 2020

Dear Mr Smith

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2019**

2, 4, 6 And 8 Danson Road Bexleyheath Kent DA6 8HB

Demolition of the existing dwellings and erection of a part 1/2/3 storey building to provide a 70 bedroom nursing home, with associated access alterations, car and cycle parking, landscaping and amenity space.

Recommend Archaeological Condition(s)

Thank you for your consultation dated 22 January 2020.

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.

NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

If you grant planning consent, paragraph 199 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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The planning application lies in an area of archaeological interest.

The application documentation includes an archaeological desk-based assessment report dated December 2019 by Archaeology Collective in respect of the above site. The report identifies that the main focus of potential is with Roman archaeology given the proximity of the site to Watling Street, a Roman road. Given the evidence available, it is concluded that given the medium potential for archaeology to be present that the on-going interest can be secured by condition.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains. However 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 the following condition on any consent:

- 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. 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 qualified 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 199. The archaeological work should include:

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,



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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.

It is recommended that a limited programme of trial trench evaluation is undertaken, for which a suitable specification will need to be submitted and approved.

The result presented as a report will enable judgement to be made as to whether there is an on-going archaeological interest and if so how it may be mitigated.

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

This response only relates to archaeology. You should also consult Historic England's Development Management on statutory matters.

Yours sincerely



Mark Stevenson

Archaeology Advisor

Greater London Archaeological Advisory Service
London and South East Region



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