



## **CBA London comments on draft London Plan**

The Council for British Archaeology (CBA) is an educational charity working throughout the UK to involve people in archaeology and to promote the appreciation and care of the historic environment for the benefit of present and future generations.

CBA London is the one of the Council for British Archaeology's network of regional groups. We aim to encourage participation in archaeology, support and enable archaeological scholarship and skills development, and to act to protect and promote London's historic environment.

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CBA (L) welcomes and supports the historic environment policies in principle, which seem to us to cover most of the issues in planning and archaeology in general terms. We have some specific points to raise which we believe would improve the London Plan.

The plan is predicated on substantial growth. The implication of this rate of growth for archaeology is that mere reliance on NPPF guidance and developer led funding is not going to be enough. There will be a need for more archaeologists/resources to:

- review sites;
- Carry out excavations where necessary;
- Undertake post excavation assessments and reports;
- Publish reports;
- Archival storage of material excavated;
- up date identification of Archaeological Priority Areas to make sure these are accurate (as far as they can be) and based on best evidence of likely finds.

Although the historical and archaeological environment may sit primarily in the chapter dealing with culture, these issues potentially run through all developments and concerns dealt with in other chapters. Ideally, we would like to see a Heritage Strategy for London as a free standing mayoral strategy document.

There is virtually no mention of places of worship as heritage – especially churches – which given the number of historically, architecturally and archeologically

significant churches is an unwelcome omission. A separate Heritage Strategy would be unlikely to leave such a gap.

Historical and archaeological matters should be read through to both natural environment policies and to policies covering other features such as canals, whose historic component is an essential part of their character and importance.

This is because historic and archaeological environment is potentially very broad, including such places as ancient woodland, canals, rivers and their riparian areas, commons and parklands, and previously industrial and military sites including for example rapidly disappearing but important first and second world war sites. These areas can easily be ignored or overlooked. This also needs to be reflected in the Green Infrastructure Policy and Environment Strategy (G3 and G7) and in mineral extraction and burial grounds (S110 and S7)

We have concerns about the archaeology that is not yet known about, the "Tier 4" areas. Tiers 1-3 are defined based on current knowledge, but at what scale of development does a project have to be before the planning authority requires some sort of assessment or evaluation to see if there are previously unknown assets? Policy H2, covering the granting of planning permission in principle for small housing sites could put such archaeology at risk without an appropriate assessment.

In relation to the larger developments represented by Opportunity Areas these should be underpinned with broad archaeological strategies covering such areas (Policy SD1).

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