

Archaeological Priority Areas

London Borough of Croydon and English Heritage

A Review

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ENGLISH HERITAGE

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Context

A review of the Archaeological Priority Zones is being undertaken as part of the partial review of the Croydon Local Plan: Strategic Policies – Partial Review. A scoping document has been produced by Historic England which concluded that the current archaeological areas could be reduced and rationalised to approximately 30. The full review of the Archaeological Priority Zones will be produced and published at the Proposed Submission stage of the Croydon Local Plan: Strategic Policies – Partial Review in Summer 2016.

Archaeological Priority Zones have been identified in the Unitary Development Plan dated 2006 and given the passage of time need to be analysed and re-assessed against current planning policy. The term Archaeological Priority Zones has been altered to Archaeological Priority Areas to encourage consistency across London reflecting new guidelines under preparation by English Heritage.

The National Planning Policy Framework (NPPF) states that local authorities should have up-to-date evidence about the historic environment in their areas and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

The NPPF expects local plans to be based on adequate, up-to-date and relevant information about the historic environment which explains its value to society – what is termed ‘significance’ – and to set out a positive strategy for its conservation and enjoyment.

Planning decisions affecting a heritage asset need to be based on a robust understanding of the development’s effect on the asset’s significance.

One of the NPPF’s twelve core planning principles is that heritage assets should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Policy 7.8 of the London Plan (Heritage Assets and Archaeology) recognises the need to identify important areas of the city’s historic environment. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. It further states that boroughs should, in their local planning documents, seek to maintain and enhance the contribution of buried heritage to London’s environmental quality, cultural identity and economy. In relation to Local Plans, part G of London Plan Policy 7.8 says that:

Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

English Heritage takes an interest in policies affecting the historic environment at a regional and local level. London’s Local Plans include Archaeological Priority Areas (APA), used to identify where developments are likely to affect archaeological remains. The APA

system is about 25 years old and in need of updating to make it more accessible, consistent and compliant with modern planning policy and best practice. New guidelines and a review program are being prepared by English Heritage. This review will update the archaeological data currently held by the planning authority and will be used in the assessment of planning applications which may impact on these areas.

Up to date Archaeological Priority Areas provide a sound evidence based spatial framework for local plan making and decision taking. They demarcate areas where known archaeological interest justified by a statement of significance which indicates the nature of the interest to be considered. Their primary purpose is to help highlight at an early stage where a development proposal may affect a heritage asset of archaeological interest and so trigger early consultation with the borough's archaeological adviser on the need for site specific assessment and field evaluation. The results of such assessment and evaluation could raise or lower the archaeological significance of the site and its surrounding area either through entirely new discoveries or better understanding of previously known assets. Assessment can also indicate how a heritage interest could be better revealed and used to enhance the local area.

Finally, the NPPF (paragraph 141) states that local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. In accordance with this, the Council will publish the full appraisal on its website to inform the Croydon Local Plan: Strategic Policies partial review.

Scoping Report

The purpose of this Scoping Report is to identify the areas of potential archaeological interest across the borough and to align this with best practice as identified by English Heritage. The Scoping Report informs the partial review of the Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options) and a full review will be completed to support the Proposed Submission document in summer 2016. Further changes are likely going forward when additional analysis of each of the sites is undertaken.

According to English Heritage, London's Archaeological Priority Areas need to be modernised. They were created piecemeal over 25 years ago without a coherent strategy or guidelines, leading to inconsistencies. Many boroughs' areas lack a supporting evidence base; do not always reflect current archaeological knowledge or today's priorities nor are they easy to access.

Defining an Archaeological Priority Area

There are a number of factors which need to be considered when defining an Archaeological Priority Area.

- The recorded existence of heritage assets or finds on the GLHER, even if these are now destroyed they may indicate potential in the surrounding area. Designated heritage assets indicate that significance has already been recognised but the archaeological dimension may not have been considered.
- Historical settlement and land use (e.g. field, marsh, wood or parkland) as indicated by aerial photographs, maps, documents and ground investigations. This is most

useful for medieval and post medieval periods and can also indicate where modern disturbance has occurred.

- The natural topography, geology and drainage of the area – how is this likely to have influenced past land use, created an archaeological ‘signature’ and preserved (or eroded) archaeological remains. These natural factors are particularly valuable in predicting areas of pre medieval interest where other evidence is sparse. Permanently waterlogged areas are particularly important for their preservation of organic remains.

The combination of archaeological, architectural, historical and natural topographic information will justify the creation of an APA, its extent and the tier group it should be placed into. In addition to the London wide indicators listed here there may occasionally be specific special local interests which also justify identification of APAs.

It is important that the APA concept is not weakened by the inclusion of areas which lack credible evidence for significance or potential. Previous archaeological excavations where little of significance was encountered or areas where extensive quarrying or similarly intrusive modern development is known to have taken place should also be taken into account. The lack of any significant finds during excavations would suggest that the archaeological potential of an area is low while major groundworks may have removed any surviving archaeological deposits. Areas which have experienced multiple phases of modern built development need careful consideration. Where they lie on known heritage assets or deeply buried land surfaces there may still be significant survival but elsewhere potential is probably low. Together these factors

should provide an indication as to whether the likely archaeological survival and potential of the area is in fact too low to justify being within an APA.

There are a number of criteria with positive or contrary indicators which should be used to determine which tier an Archaeological Priority Area should fall into.

Methodology

Guidance produced by the Greater London Archaeological Advisory Service aims to make APAs more consistent in terms of their selection, extent and how their accompanying descriptions are written. Crucially APAs will be placed into three different tiers depending on their archaeological significance and potential, with a fourth tier covering all land outside a defined APA. It is intended that the review will help APAs to become more closely linked to the National Planning Policy Framework and the London Plan.

APAs act as a trigger for consultation with the borough’s archaeological adviser and are justified by a description of significance which will inform development management advice and decision making. The appraisal can also indicate how archaeology might contribute towards a positive strategy for conserving and enjoying the local historic environment, for example through recognising local distinctiveness or securing social or cultural benefits. However, archaeological research and discovery is a dynamic process so it is not possible to anticipate all eventualities, threats and opportunities.

Previously all parts of a borough were either inside or outside an APA. Under the new system all parts of a borough will be within an

area that falls into one of four different tiers of archaeological significance and potential. The tiers vary depending on the archaeological significance and potential of that particular area. Archaeological Priority Areas will be categorised into one of Tiers 1-3 while all other areas within a borough will be regarded as being in Tier 4.

The introduction of a 'tiered' system will distinguish those areas which are most significant and sensitive to change from those which although still of interest are not so vulnerable. This will help local authorities, developers and their archaeological advisers to focus their resources and technical expertise on those development proposals where archaeological interests are a necessary and significant consideration for the decision-making process.

Tier 1 is focused on a specific heritage asset of national significance equivalent to a scheduled monument or otherwise of very high archaeological interest. Thus Tier 1 covers heritage assets to which policies for designated heritage assets would apply (NPPF 139) and a few other sites of comparable interest. They will be clearly focused on a specific known heritage asset and will normally be relatively small, although the historic urban core of London and Westminster is an exception.

Tier 2 is a local area within which the GLHER holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest. They will generally cover a larger area than tier 1 and may encompass a group of heritage assets.

Tier 3 is a landscape scale zone within which the GLHER holds evidence indicating the potential for heritage assets of

archaeological interest. The definition of Tier 3 APAs involves using the GLHER to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future (NPPF 169). Tier 3 APAs will typically be defined by geological, topographical or land use considerations in relation to known patterns of heritage asset distribution.

Tier 4 (outside APA) is any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area. However, Tier 4 areas are not necessarily devoid of archaeological interest and may retain some potential unless they can be shown to have been heavily disturbed in modern times.

The scoping appraisal carried out on behalf of London involved a rapid expert review of evidence held by the Greater London Historic Environment Record in relation to English Heritage's draft Archaeological Priority Area Guidelines (v2.1) which provides a consistent framework for recognising areas of known interest or particular potential for new discoveries.

Proposed Archaeological Priority Areas

Addington and Addington Palace: Addington is mentioned in the Domesday Book and a 12th century church is located there. Addington Palace is a Grade II Registered Park and Garden which is also recorded in the Domesday Book and was later used as a hunting park by Henry VIII. In the 19th century Addington Palace was a residence for the Archbishop of Canterbury.

Addington Hills: Prehistoric finds. The APA includes the former site of Ballards House and plantation. Remains of the house may still be present since the site has not been redeveloped.

Beddington: Prehistoric finds have been recorded in this area and on the other side of the borough boundary in Sutton.

Cane Hill: Scheduled section of Surrey Iron Railway Embankment; former site of Cane Hill psychiatric hospital; prehistoric finds; Saxon cemetery.

Castle Hill: Possibly the site of a former castle or medieval manorial site. Prehistoric material also found within the APA. The area on the other side of the borough boundary in Bromley is also an APA.

Croham Hurst: Scheduled site of Croham Hurst Round Barrow plus other prehistoric finds.

Croydon Downs: A landscape scale proposed APA which covers most of the southern border of Croydon apart from the built up area of New Addington and the APA for RAF Kenley. It covers most of the high ground area of southern Croydon where prehistoric settlements may have been located. It is

possible that it may be broken down further during the revision stage of the APA update - for example the scheduled monument of Newe Ditch in Riddlestown would probably merit being situated within its own APA.

Croydon Town: Medieval market town, mentioned in the Domesday Book and numerous archaeological finds from all periods have been found there.

Elmers End: Scheduled site of Elmers End Moated Site. Quarrying has taken place within the APA and the scale of the quarrying and the impact it may have had on any surviving archaeology will have to be analysed further.

Farthing Down: Scheduled site of Farthing Down plus the surrounding area.

Haling Grove: Former site of Haling Grove Manor House. The site has not been redeveloped so remains of the house are anticipated to survive.

Hook's Hill: Prehistoric finds; Iron Age settlement; Saxon cemetery.

London to Brighton Roman Road: A buffered area approximately 200m wide on either side of the projected route of the London to Brighton Roman road running from north to south through Croydon.

London to Lewes Roman Road: A buffered area along the projected route of the London to Lewes Roman road. In this area the borough boundary between Croydon and Bromley follows the same route as the Roman road.

Mere Bank: The area of a prehistoric earthwork which forms a boundary on the border between Sutton and Croydon. It may have run further southwards than the APA boundary and this will need to be analysed further.

Norwood Grove: Norwood Grove is a Grade II 19th century house within a Grade II Registered Park and Garden. A possible earthwork is also located within the APA.

Old Coulsdon: Settlement that is mentioned in the Domesday Book and includes a 13th century church.

Pampisford Road: Concentrations of prehistoric finds on either side of the road.

Pollards Hill: Prehistoric earthwork.

RAF Kenley: Site of a key World War Two airfield which includes 11 scheduled fighter pens.

Russell Hill: Site of a Saxon cemetery.

Sanderstead: Settlement mentioned in the Domesday Book which includes a 13th century church.

Starrock Road: Possible Saxon cemetery.

Waddon: Numerous prehistoric finds which have also been made on the Sutton side of the borough boundary. The Wandle passes through this APA and remains of riverside industries might survive.

Wandle Valley: The proposed Wandle Valley APA follows the contour line of where the Wandle would have flowed as it descended from the North Downs. The precise boundary of the APA will be analysed more closely during the revision stage. The remains of riverside settlements may be present within this APA.

Watendone: A deserted medieval village.

Woodcote: A deserted medieval village which is also covered by an APA on the Sutton side of the borough boundary.

Application in determining planning applications

Current consultation guidelines are set out in the GLAAS Charter (2010). New guidelines are in preparation to link the sensitivity tiers to specific thresholds for triggering archaeological advice and assessment. In general the higher tier areas are more sensitive to development in that there is a greater likelihood of typical development impacts causing significant harm to a heritage asset of archaeological interest.

In future, it is expected that as a minimum all major applications within Archaeological Priority Areas (tiers 1-3) would trigger an archaeological deskbased assessment, and if necessary a field evaluation, to accompany a planning application. In the more sensitive tier 1 and 2 areas this procedure would also apply to some smaller-scale developments. Outside Archaeological Priority Areas (that is in tier 4) most planning applications will not need an archaeological assessment but a few will.

Next Steps

The Croydon Local Plan: Strategic Policies – Partial Review takes account of the scoping document. The information within the scoping document is available to be consulted upon as part of the consultation of the Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options). The full review of the Archaeological Priority Areas will support the Proposed Submission publication in summer 2016.

Map of Archaeological Priority Areas

