



# North Cray Road ESS Sidcup Bexley, Greater London

Historic Environment Desk-Based Assessment



Report prepared for: DWD Property and Planning Ltd

CA Project: AN0958

CA Report: AN0958\_01

April 2025



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# **SUMMARY**

**Project Name: North Cray Road ESS** 

Location: Sidcup, Bexley, Greater London

NGR: 548849 171002

In January 2025 Cotswold Archaeology was commissioned by DWD Property and Planning Ltd to carry out a Desk-Based Assessment with respect of land east of North Cray Road, in Bexley, Greater London. The report was commissioned in connection with the proposed development of an Energy Storage System (ESS) and aims to identify any potential heritage constraints and to present mitigation measures to address these constraints where appropriate.

This assessment has identified no overriding heritage constraints to the proposed development. However, there is the potential for archaeological remains to occur within the Site, based on recorded archaeological deposits identified within the study area. Specifically remains of prehistoric or Roman date in the form of unstratified findspots or the remnants of nearby Roman or Iron Age field systems. The documentary and cartographic sources suggest that Site was under the plough during the medieval and post-medieval periods which may be present in the archaeological record as the subsurface remains of ridge and furrow, however these have limited heritage value.

The groundworks associated with the proposed development will disturb any potential buried archaeological remains within the Site. It is therefore likely that a programme of archaeological investigation will be required prior to any development groundworks. The requirement and scope of any further archaeological investigations should be agreed through consultation with the Greater London Archaeological Advisory Service.

The assessment has also considered the potential impact of the proposed development upon the significance of nearby designated and locally listed heritage assets through changes to their setting, and no adverse effects have been identified. The proposed development is therefore considered to meet the requirements of policy and legislation relating to the setting of heritage assets.

# 1. INTRODUCTION

1.1. In January 2025, Cotswold Archaeology was commissioned by DWD Property and Planning Ltd to undertake a Historic Environment Desk-Based Assessment in respect of land east of North Cray Road, Bexley, Greater London (hereafter referred to as 'the Site'). Presently in use as arable, the Site is located c.350m east of the A223, c.450m north of the B2173, c.2.7km south-east of Sidcup, near Bexley (NGR: 548818 171005; Fig. 1).

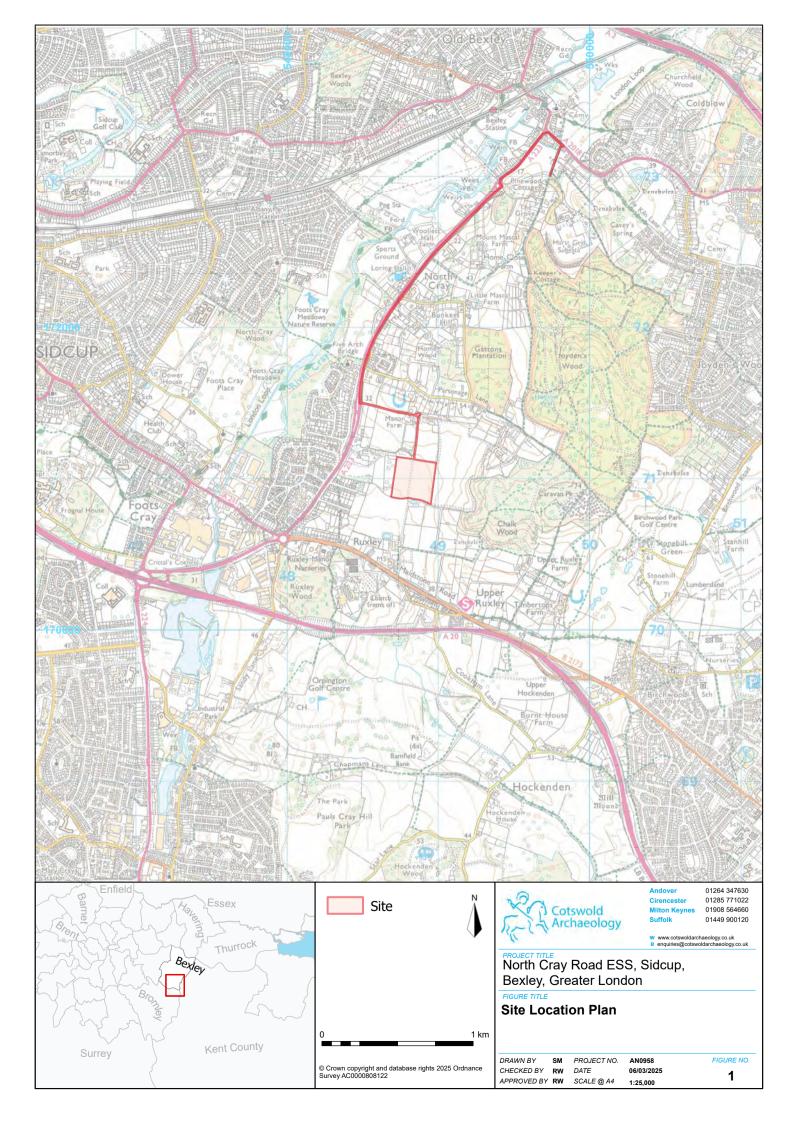


Photo, 1 View north-east across the Site

1.2. The proposed development will comprise the construction of a new Energy Storage System (ESS) with associated access track from the north of Site. The Site boundary includes a cable route running north-east along the A223 (Fig. 1). The cable route has been excluded from this assessment as it is contained wholly within the previously impacted area of the road surface therefore works associated with laying the cable will have no impact upon the archaeological or heritage resource.

#### Objectives and professional standards

1.3. The composition and development of the historic environment within the Site and wider landscape are discussed in this report. A determination of the significance of any heritage assets located within the Site, and any heritage assets beyond the Site boundary that may potentially be affected by the development proposals, is presented. Any potential development effects upon the significance of these heritage assets (both adverse and/or beneficial) are then described.



- 1.4. Cotswold Archaeology is a Registered Organisation with the Chartered Institute for Archaeologists (ClfA). This report has been prepared in accordance with appropriate standards and guidance, including the 'Standard and Guidance for Historic Environment Desk-Based Assessment' published by ClfA in 2014 and most recently updated in 2020. This states that, insofar as they relate to the determination of planning applications, heritage desk-based assessments should:
  - '...enable reasoned proposals and decisions to be made [as to] whether to mitigate, offset or accept without further intervention [any identified heritage] impact' (CIfA 2020, 4).
- 1.5. The 'Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment' (Historic England 2015), further clarifies that a desk-based assessment should:
  - '...determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation' (Historic England 2015, 3).

#### Statute, policy and guidance context

- 1.6. The Site is located in the local authority of Bexley. A new Local Plan, 'Bexley Local Plan', was adopted in April 2023. The policy relevant to Heritage is located under section 'SP6; Managing Bexley's Heritage Assets' Policy DP14. Additionally as Bexley is located within the Greater London the development plan for London as a whole 'The London Plan 2021' is also relevant to this report. Section 7 Heritage and culture addresses heritage matters.
- 1.7. This assessment has been undertaken within the key statute, policy and guidance context presented within Table 1.1. The applicable provisions contained within these statute, policy and guidance documents are referred to, and discussed, as relevant, throughout the text. Fuller detail is provided in Appendix 1.

| Statute   | Description   |  |  |  |
|---|---|--|--|--|
| Ancient Monuments<br>and Archaeological<br>Areas Act (1979)   | Act of Parliament providing for the maintenance of a schedule of archaeological remains of the highest significance, affording them statutory protection.   |  |  |  |
| National Heritage Act<br>1983 (amended 2002)  | One of four Acts of Parliament providing for the protection and management of the historic environment, including the establishment of the Historic Monuments & Buildings Commission, now Historic England.   |  |  |  |
| Planning (Listed<br>Buildings and<br>Conservation Areas)<br>Act (1990)  | Act of Parliament placing a duty upon the Local Planning Authority (or, as the case may be, the Secretary of State) to afford due consideration to the preservation of Listed Buildings and their settings (under Section 66(1)), and Conservation Areas (under Section 72(2)), in determining planning applications.   |  |  |  |
| National Planning<br>Practice Guidance<br>(updated July 2019)   | Guidance supporting the National Planning Policy Framework.   |  |  |  |
| National Planning<br>Policy Framework<br>(2024)   | Provides the English government's national planning policies and describes how these are expected to be applied within the planning system. Heritage is subject of Chapter 16 (page 59).  |  |  |  |
| Bexley Local Plan<br>(2023)   | Comprises the local development plan (local plan), as required to be compiled, published and maintained by the local authority, consistent with the requirements of the NPPF (2024). Intended to be the primary planning policy document against which planning proposals within that loca authority jurisdiction are assessed. Where the development plan is found to be inadequate, primacy reverts to the NPPF (2024). |  |  |  |
| London Plan 2021  | Comprises the Development Plan for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.  |  |  |  |
| Conservation<br>Principles (Historic<br>England 2008)   | Guidance for assessing heritage significance, with reference to contributing heritage values, in particular: evidential (archaeological), historical (illustrative and associative), aesthetic, and communal.   |  |  |  |
| Good Practice Advice<br>in Planning: Note 2<br>(GPA2): Managing<br>Significance in<br>Decision-Taking in the<br>Historic Environment<br>(Historic England 2015) | Provides useful information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.  |  |  |  |
| Good Practice Advice<br>in Planning: Note 3<br>(GPA3): The Setting of<br>Heritage Assets,<br>Second Edition<br>(Historic England<br>2017b)                      | Provides guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.   |  |  |  |
| Hedgerows<br>Regulations (1997)   | Provides protection for 'important' hedgerows within the countryside, controlling their alteration and removal by means of a system of statutory notification.  |  |  |  |

 Table 1.1
 Key statute, policy and guidance

# 2. METHODOLOGY

## Data collection, analysis and presentation

2.1. This assessment has been informed by a proportionate level of information sufficient to understand the archaeological potential of the Site, the significance of identified heritage assets, and any potential development effects. This approach is in accordance with the provisions of the NPPF (2024) and the guidance issued by ClfA (2020) and the Greater London Archaeological Advisory Service (Historic England 2015a). The data has been collected from a wide variety of sources, summarised in Table 2.1.

| Source  | Data  |  |  |
|---|---|--|--|
| National Heritage List for<br>England (NHLE)  | Current information relating to designated heritage assets, and heritage assets considered to be 'at risk'.   |  |  |
| Greater London Historic<br>Environment Record (HER)   | Heritage sites and events records, Historic Landscape Characterisation (HLC) data, and other spatial data supplied in digital format (shapefiles) and hardcopy. |  |  |
| Historic England Archive (HEA)  | Additional sites and events records, supplied in digital and hardcopy formats.  |  |  |
| Bexley Archives   | Historic mapping, historic documentation, and relevant published and grey literature.   |  |  |
| Historic England's Aerial<br>Photograph Research Unit   | Vertical and oblique aerial photography ranging in date from the 1940s to present.  |  |  |
| Defra Data Services Platform (environment.data.gov.uk)  | LiDAR imagery and point cloud data, available from the Defra Data Services Platform   |  |  |
| Genealogist, Envirocheck, National Library of Scotland & other cartographic websites  Historic (Ordnance Survey and Tithe) mapping in digital |   |  |  |
| British Geological Survey (BGS) website  UK geological mapping (bedrock & superficial deposed borehole data.                                  |   |  |  |

Table 2.1Key data sources

2.2. Prior to obtaining data from these sources, an initial analysis was undertaken in order to identify a relevant and proportionate study area. This analysis utilised industry-standard GIS software, and primarily entailed a review of recorded heritage assets in the immediate and wider landscape, using available datasets.

- 2.3. On this basis a 1km study area, measured from the boundaries of the Site, was considered sufficient to capture the relevant HER data, and provide the necessary context for understanding archaeological potential and heritage significance in respect of the Site. All of the spatial data held by the HER the primary historic data repository for the land within the study area, was requested. The records were analysed and further refined in order to narrow the research focus onto those of relevance to the present assessment. Not all HER records are therefore referred to, discussed or illustrated further within the body of this report, only those that are relevant. These are listed in a cross-referenced gazetteer provided at the end of this report (Appendix 2) and are illustrated on the figures accompanying this report.
- 2.4. A site visit was also undertaken as part of this assessment on the 6th February 2025. The primary objectives of the site visit were to assess the Site's historic landscape context, including its association with any known or potential heritage assets, and to identify any evidence for previous truncation of the on-site stratigraphy. The site visit also allowed for the identification of any previously unknown heritage assets within the Site, and assessment of their nature, condition, significance and potential susceptibility to impact. The wider landscape was examined, as relevant, from accessible public rights of way.

#### Aerial photographs held at Historic England Archive

2.5. Aerial photographs held at Historic England were examined as part of this assessment, ranging in date from 1946 to 2000. The aerial photographs show that the Site was subject to no development during the latter part of the 20th century, other than activity associated with agriculture. Features and buildings noted, which are discussed in further detail below, appear to relate to such activity and correlate with historic mapping available for the Site.

#### **LiDAR** imagery

- 2.6. Existing Environment Agency data was analysed with the specific aim of clarifying the extent any potential archaeological remains.
- 2.7. Lidar DTM and DSM rasters were obtained from the DEFRA portal. The data was available at 1m resolution, for the extent of the site boundary. The rasters were downloaded as .tif files.

- 2.8. The Lidar .tif files contain British National Grid as the "native" coordinate reference system. The tiles were combined into a mosaic raster dataset using Esri ArcGIS Pro 3.3.0 to cover the area of interest.
- 2.9. The resulting .tif was then processed using Relief Visualisation Toolbox (RVT) (Kokalj et al. 2019 and Zakšek et al. 2011) to create a number of visualisations including a hillshade, multi-hillshade, Slope, sky view factor, positive & negative openness and local relief model following Historic England guidelines (Historic England 2010) and guidance in Airborne Laser Scanning Raster Visualisation: A guide to good practice (Kokalj and Hesse 2017). The parameters were set to those appropriate for the topography of the area.
- 2.10. The output images from the RVT software were then imported into the ArcGIS Pro 3.3.0 where further settings manipulation was undertaken to enhance the visualization for archaeological feature detection.
- 2.11. DTM tile formed the basis within the desk-based assessment and is illustrated on Fig.7.

# Assessment of heritage significance

2.12. The significance of known and potential heritage assets within the Site, and any beyond the Site which may be affected by the proposed development, has been assessed and described, in accordance with paragraph 207 of the NPPF (2024), the guidance issued by CIfA (2020), Historic Environment Good Practice Advice in Planning Note 2 (Historic England 2015), Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England 2019) and Advice Note 17: Planning and Archaeology (Historic England 2022). Determination of significance has been undertaken according to the industry-standard guidance on assessing heritage value provided within Conservation Principles (English Heritage 2008). This approach considers heritage significance to derive from a combination of discrete heritage values, principal amongst which are: i) evidential (archaeological) value, ii) historic (illustrative and associative) value, iii) aesthetic value, iv) communal value, amongst others. Further detail of this approach, including the detailed definition of those aforementioned values, as set out, and advocated, by Historic England, is provided in Appendix 1 of this report.

# Assessment of potential development effects (benefit and harm)

- 2.13. The present report sets out, in detail, the ways in which identified susceptible heritage assets might be affected by the proposals, as well as the anticipated extent of any such effects. Both physical effects, i.e. resulting from the direct truncation of archaeological remains, and non-physical effects, i.e. resulting from changes to the setting of heritage assets, have been assessed. With regard to non-physical effects or 'settings assessment', the five-step assessment methodology advocated by Historic England, and set out in the Second Edition of GPA3 (Historic England 2017b), has been adhered to (presented in greater detail in Appendix 1).
- 2.14. Identified effects upon heritage assets have been defined within broad 'level of effect' categories (Table 2.2). These are consistent with key national heritage policy and guidance terminology, particularly that of the NPPF (2024). This has been done in order to improve the intelligibility of the assessment results for purposes of quick reference and ready comprehension. These broad determinations of level of effect should be viewed within the context of the qualifying discussions of significance and impact presented in this report.
- 2.15. It should be noted that the overall effect of development proposals upon designated heritage assets are judged, bearing in mind both any specific harms or benefits (an approach consistent with the Court of Appeal judgement *Palmer v. Herefordshire Council & ANR* Neutral Citation Number [2016] EWCA Civ 1061).

| Level of effect     | Description   | Applicable statute & policy   |  |
|---------------------|---|---|--|
| Heritage<br>benefit | The proposals would better enhance or reveal the heritage significance of the heritage asset. | Enhancing or better revealing the significance of a heritage asset is a desirable development outcome in respect of heritage. It is consistent with key policy and guidance, including the NPPF paragraphs 203 and 219. |  |
| No harm             |   | Preserving a Listed building and its setting is consistent with s66 of the Planning (Listed Buildings and Conservation Areas) Act (1990).   |  |
|                     | The proposals would preserve the significance of the heritage asset.                          | Preserving or enhancing the character or appearance of a Conservation Area is consistent with s72 of the Act.   |  |
|                     |   | Sustaining the significance of a heritage asset is consistent with paragraph 203 of the NPPF, and should be at the core of any material local planning policies in respect of heritage.                                 |  |

| Level of effect                                 | Description  | Applicable statute & policy   |
|---|--|---|
| Less than<br>substantial<br>harm<br>(lower end) | The proposals would be anticipated to result in a restricted level of harm to the significance of the heritage asset, such that the asset's contributing heritage values would be largely preserved. | In determining an application, this level of harm should be weighed against the public benefits of the proposals, as per paragraph 215 of the NPPF.  Proposals involving change to a Listed Building or its setting, or any features of   |
| Less than substantial harm (upper end)          | The proposals would lead to a notable level of harm to the significance of the heritage asset. A reduced, but appreciable, degree of its heritage significance would remain.                         | special architectural or historic interest which it possesses, or change to the character or appearance of Conservation Areas, must also be considered within the context of Sections 7, 66(1) and 72(2) of the 1990 Act. The provisions of the Act do not apply to the setting of Conservation Areas.  Proposals with the potential to physically affect a Scheduled Monument (including the ground beneath that monument) will be subject to the provisions of the Ancient Monuments and Archaeological Areas Act (1979); these provisions do not apply to proposals involving changes to the setting of Scheduled Monuments.  With regard to non-designated heritage assets, the scale of harm or loss should be weighed against the significance of the asset, in accordance with paragraph 216 of the NPPF |
| Substantial<br>harm                             | The proposals would very much reduce the heritage asset's significance or vitiate that significance altogether.  | Paragraphs 212 - 215 of the NPPF would apply. Sections 7, 66(1) and 72(2) of the Planning Act (1990), and the Ancient Monuments and Archaeological Areas Act (1979), may also apply.  In relation to non-designated heritage assets, the scale of harm or loss should be weighed against the significance of the asset, in accordance with paragraph 216 of the NPPF.   |

**Table 2.2** Summary of level of effect categories (benefit and harm) referred to in this report in relation to heritage assets, and the applicable statute and policy.

2.16. In relation to non-designated heritage assets, the key applicable policy is paragraph 216 of the NPPF (2024), which states that:

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the

# scale of any harm or loss and the significance of the heritage asset [our emphasis].'

2.17. Thus with regard to non-designated heritage assets, this report seeks to identify the significance of the heritage asset(s) which may be affected, and the scale of any harm or loss to that significance.

#### Limitations of the assessment

- 2.18. This assessment is principally a desk-based study, and has utilised secondary information derived from a variety of sources, only some of which have been directly examined for the purpose of this assessment. The assumption is made that this data, as well as that derived from secondary sources, is reasonably accurate. The records held by HER and HEA are not a record of all surviving heritage assets, but a record of the discovery of a wide range of archaeological and historical components of the historic environment. The information held within these repositories is not complete, and does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.
- 2.19. No relevant material was identified at either the Kent or Bexley Archives. There may be other relevant material held by the National Archives, other local repositories, and in private collections, although sufficient information to respond to the scope of this assessment was available in from the resources consulted.
- 2.20. A walkover survey was conducted within the Site on 5th and 6th February 2025, which was undertaken in dry and clear weather conditions. Access was afforded within the Site, although such observations are limited since archaeological remains can survive below-ground with no visible surface indications of their presence. It is possible that unknown archaeological remains may be present within the Site, and the presence of modern infrastructure may possibly have inhibited identification of any possible upstanding remains. There is an element of uncertainty over the nature, condition, frequency and extent of the potential buried archaeological resource; which may be clarified through intrusive investigation. There was also sufficient access to heritage assets to assess likely impacts upon the significance of the assets due to changes to their setting.
- 2.21. The best resolution of digital terrain model lidar imagery of the Site, available from the EA, is 1m. This resolution is sufficient to identify large archaeological features such as boundary ditches, however smaller discrete features may not be visible.

#### 3. ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

#### Landscape context

3.1. The Site lies within the London Borough of Bexley. It is located c. 500m east of the A223, c.600m north of the B2173, c.2.7km south-east of Sidcup, near Bexley in Greater London. The Site lies at an altitude of 30m above Ordnance Datum (aOD) in the south-east corner, there is a gently sloping hill down towards 26m aOD in the north-west. The Site comprises an area of 7.95ha and is currently in use as farmland but also includes the access route running from the A223 along North Cray Road and then south along the farm track. The Site is bounded to the north, south and west by more farmland, to the south-east a large area of polytunnels have been erected for crop production. Directly to the east of the Site there is a small area of pasture.



Photo. 2 View across the Site looking south

- 3.2. The Site sits on the eastern side of the River Cray valley, the River its self lies c.700m to the north-west of Site. The Site lies within the North Kent Plain National Character Area. The area is open, low and gently undulating. It is considered ideal agricultural land with predominantly high-quality, fertile loam soils characterised by arable use. Furthermore traditional orchards and soft fruits are grown across this region (Natural England 2025).
- 3.3. The underlying geology of the Site is mapped as a mixture of Lewes Nodular Chalk Formation, Seaford Chalk Formation and Newhaven Chalk Formation. These are sedimentary bedrocks that formed between 93.9 and 72.1 million years ago during the Cretaceous period (British Geological Survey Online Viewer accessed: 27/1/25). Additionally, in the central part of the Site, a band of clay, silt, sand and gravel head deposits runs south-east to north-west. These formed between 2.588 million years ago and the present during the Quaternary period (*ibid*.). Located c.200m to the south of the Site borehole TQ47SE575 recorded the stratigraphy as 0.6m of made ground

above 0.6m of natural brown clay with flints followed by 11m of orange brown sand and gravel (British Geological Survey Online Viewer accessed: 5/2/25).

#### Designated heritage assets

- 3.4. There are no Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, or any Listed Buildings within the Site. There are no Registered Battlefields within the study area.
- 3.5. There are 14 Grade II Listed Buildings (Fig. 2: LB1-LB15) and one Grade II\* Listed Building (Fig. 2: LB1) within the study area. Furthermore there are two Conservation Areas (High Beeches c.300m east of the Site Fig. 2: CA2 and North Cray Village c.600m north Fig. 2: CA1) and a Registered Park and Garden (Foots Cray Place c.350m north-west Fig. 2: RPG1) within the study area.
- 3.6. In addition, there is one Locally Listed Building, the Manor Farm Farmhouse (Fig. 2: LLB1) located c.270m to the north of the Site and immediately adjacent to the Site's access route.
- 3.7. There is a Scheduled Monument c.800m south of the Site at Ruxley Old Church. The monument includes a 13th century parish church and the buried remains of an earlier church and timber-framed building, surviving as upstanding and below ground remains (Historic England 2013). All designated heritage assets are shown on Fig. 2. The next closest Scheduled monument to the Site is Faesten Dic, a medieval frontier work c.1.2km to the east of the Site in Joydens Wood (Historic England 1995).
- 3.8. Designated Heritage Assets are included in the discussion below where relevant, and within the settings assessment presented in section 5.

# **Archaeological Priority Areas**

3.9. There are three Archaeological Priority Areas (APA) within the study area. The APAs are defined as 'area(s) where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries' (Historic England 2020); these are classified following a system of Tiers in which Tier IV is considered the lowest grade of archaeological potential whilst Tier I is considered the highest (HE 2016b).

3.10. These are shown on Fig. 2 and in Table 3.1. The Site is not within any of the APAs however the proximity to areas that have been identified as highly significant certainly increases the likelihood of encountering remains within the Site.

| Name   | Tier | Description   |  |
|--|------|---|--|
| Ruxley   | I    | This APA contains the small medieval settlement of Ruxley and the Scheduled Ancient Monument of Ruxley Old Church.  |  |
| River Cray: Valley and Floodplain  | II   | Significant prehistoric potential including Palaeolithic and Mesolithic findspots associated with the Crayford silt deposits. This includes material from at least two separate working floors and a large assemblage of flakes, cores, blades and other tools and debitage. The assemblage generally dates from the Upper Palaeolithic.  Plentiful Roman and medieval remains also exists across the APA including a possible early medieval church.   |  |
| The Archaeological Priority Area covers a land land, historic commons and ancient woodlar of the River Cray. Areas of ancient woodlar archaeological interest for their own superservation of earlier features. The APA remains dating to the prehistoric, Roman, more described by the prehistoric in the |      | The Archaeological Priority Area covers a large expanse of agricultural land, historic commons and ancient woodland immediately to the east of the River Cray. Areas of ancient woodland and commons are of archaeological interest for their own sake and as islands of preservation of earlier features. The APA contains archaeological remains dating to the prehistoric, Roman, medieval and postmedieval periods as well as undated cropmark and earthwork features and numerous findspots. |  |

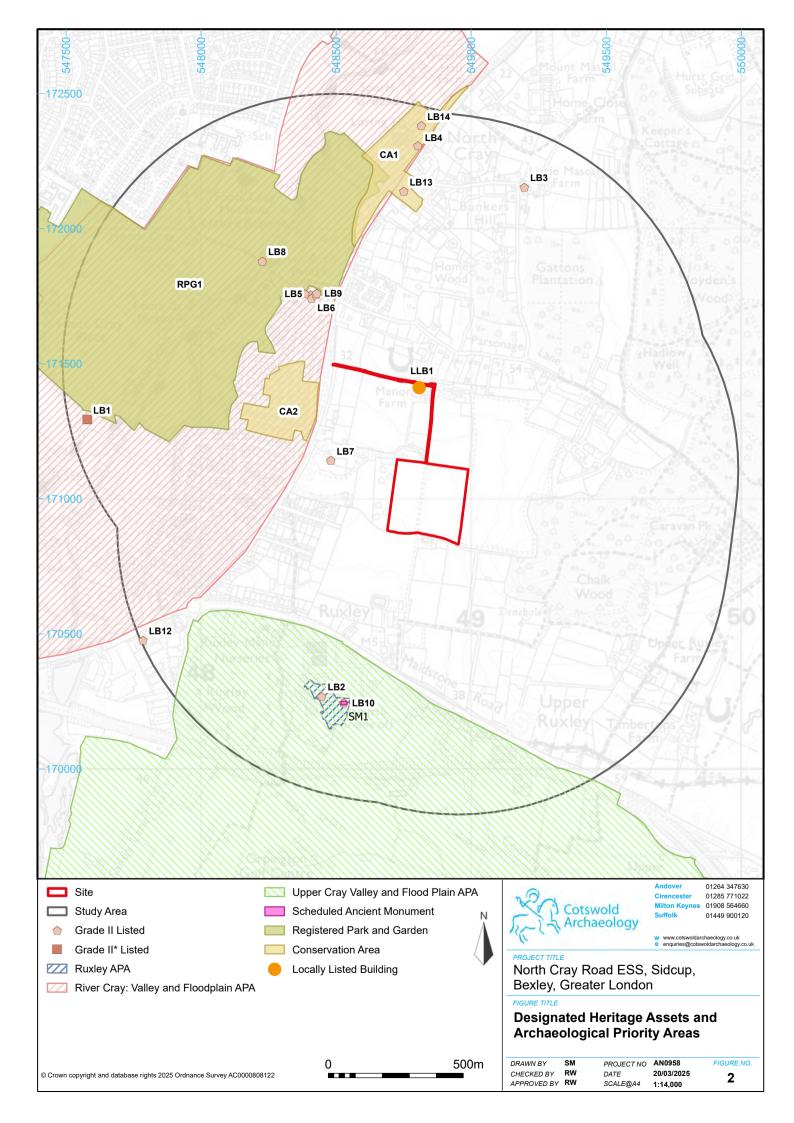
Table 3.1 Archaeological Priority areas.

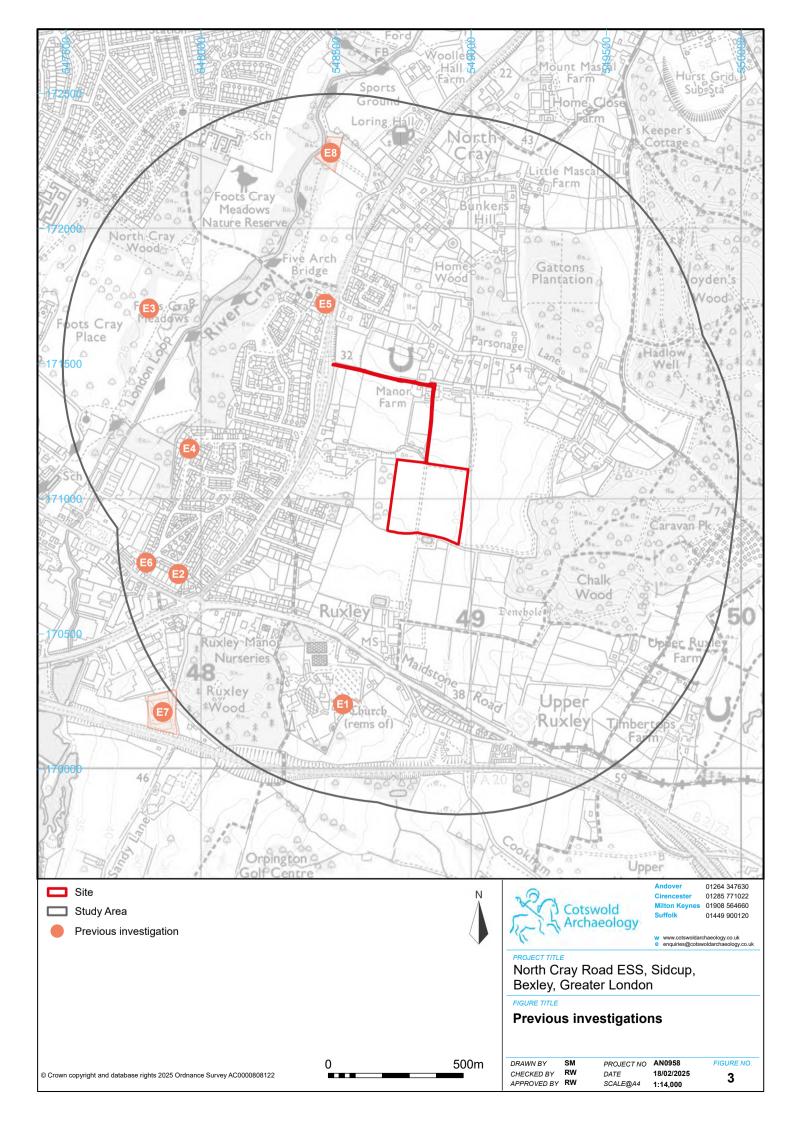
#### Previous archaeological investigations

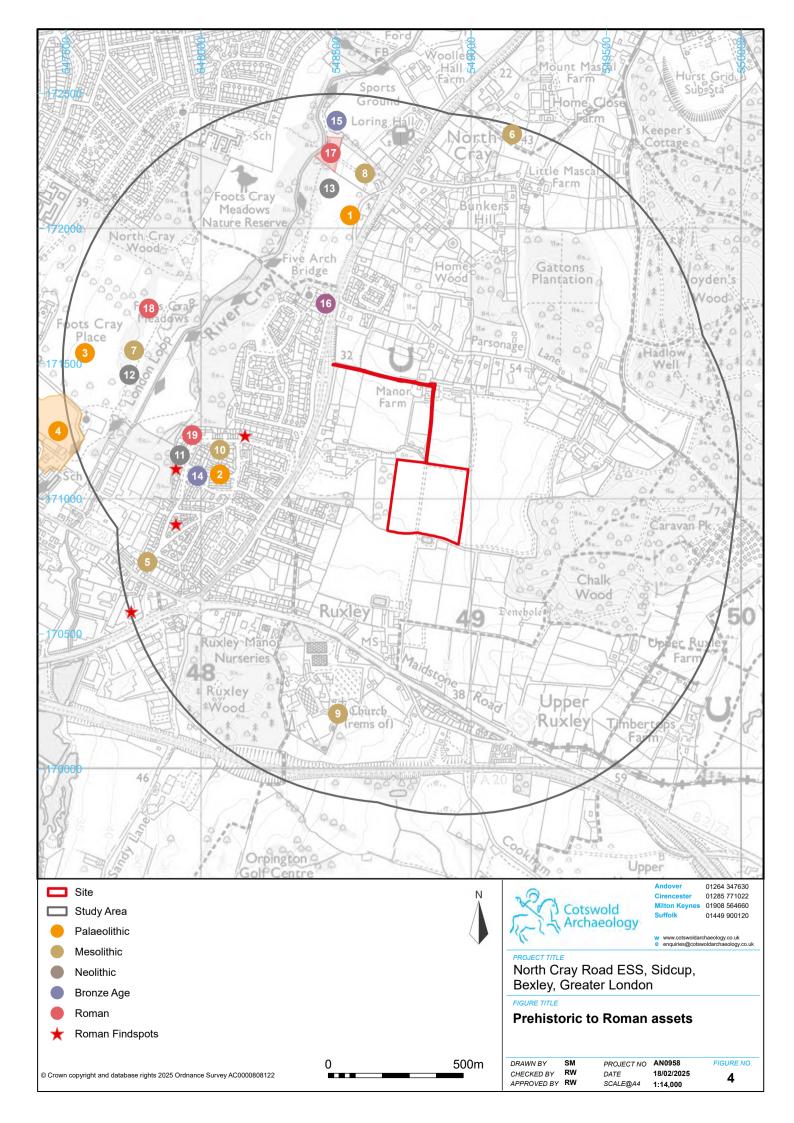
- 3.11. Some archaeological fieldwork has previously been carried out within the study area. Previous investigations, which included assessments as well as a range of intrusive works, such as watching briefs, evaluations and excavations, are illustrated on Fig. 3.
- 3.12. A number of archaeological investigations have taken place at Ruxley Old Church (Historic England 2013) c.600m south of the Site (Fig. 3; E1). Two phases of open area excavation were undertaken in 1968 and these revealed the various phases of construction of the church including a possible 9th century AD timber structure thought to be the original church as well as a later two-celled stone building (Leonard 1970). A number of burials were also encountered possibly dating back just as far as the original timber structure. Furthermore at the same location three trial trenches found 11th-12th century burials as well as contemporary burials to the current building. Additionally the foundations of the earlier church building was once again exposed. A further archaeological watching brief was also maintained at the site of Ruxley Old Church (Fig. 3; E1) in 2007 while a service trench was excavated.

Excavation revealed three in situ human burials that had been heavily damaged during excavations (Jorgensen 2008).

- 3.13. Four trial trenches were excavated c.700m north-west of the Site (Fig. 3; E3) in 1991. A large deposit of black loam containing much Roman domestic waste seems to indicate a paleochannel of Roman date. The finds indicated association with a nearby Romano-British settlement (Greenwood 1991).
- 3.14. The remains of a large Roman bathhouse with adjoining kitchen were uncovered c.700m to the west of the Site (Fig. 3; **E4**). The bath house was excavated in 1952, it consisted of a 1st century AD apsidal bath; lead waste pipe and tiles were also found (Parsons 1956). Next to the bathhouse there was a 250ft square ditched enclosure also identified during development of the area.
- 3.15. An archaeological strip, map and record exercise was conducted in 2006 by Wessex Archaeology c.150m north of the Site (Fig. 3; E5). The exercise revealed evidence of the 18th and 19th century kitchen gardens of North Cray Place, in the form of horticultural soil and bedding trenches. A north-south aligned ditch contained burnt flint, grog tempered and wheel thrown pottery indicating a Late Iron Age/Early Roman date. A north-south line of three postholes containing burnt daub may have formed an earlier Iron Age boundary (Dayton 2007).
- 3.16. Two trenches excavated in 2001 by Archaeology South-East c.880m south-west of the Site (Fig. 3; E6) recorded a buried Mesolithic surface consisting of peat deposits that formed due to the waterlogged conditions caused by the nearby river Cray. The peat contained some fire cracked flints of Mesolithic date (Stevens 2001).
- 3.17. A number of investigations encountered no archaeological deposits. An archaeological evaluation was undertaken in 2007 by MOLA c.1km south-west of the Site (Fig. 3; E7). Five trenches were excavated. These revealed only natural deposits. Trench 2 confirmed that the western part of the site had been subject to remodelling and subsequent landfilling. In the light of these results the MOLA concluded that the site had little or no archaeological potential (Cardiff 2007). A single trial trench was excavated c.800m south-west of the Site (Fig. 3; E2) no archaeological remains were recorded. A watching brief carried out in 1990-91 c.800m north of Site by Kent Archaeological Unit (Fig. 3; E8) revealed very little archaeological deposits.







#### Palaeolithic (>500,000 BC - 10,000 BC)

- 3.18. During the Palaeolithic Britain was part of the continental European landmass, and was inhabited by nomadic groups of hunter-gathers during inter-glacial periods. Archaeological remains of this date as scarce across the country therefore any location where they are encountered this is significant. Palaeolithic finds when encountered are often unstratified artefacts in alluvial deposits. The Site is proximal to the River Cray which is known to have high Palaeolithic potential. Furthermore the presence of a head deposit within the Site increases the chances of finding unstratified isolated findspots Palaeolithic origin on the Site (Historic England 2023).
- 3.19. Across the study area there is extensive evidence of Palaeolithic activity. The River Cray: Valley and Floodplain APA c.300m to the west of Site (Fig. 2) has been highlighted as containing evidence of Palaeolithic activity including working surfaces and lithic artefacts, often associated with the Crayford Silt deposit which does not extend into the Site. A number of Upper Palaeolithic lithic working Sites are within the study area; located either side of the River Cray c.650m west of the Site (Fig. 4; 2) and c.890m west of the Site (Fig. 4; 3). At both sites a large quantity of Palaeolithic worked flint was recovered including Aurignacian and Magdalenian blade types.
- 3.20. A further lithic working site has been identified at Baugh Road c.1km west of the Site (Fig. 4; 4). Also located in the floodplain of the River Cray this gravel pit working has produced a number of Palaeolithic flint artefacts including blades and flint cores. Furthermore a single findspot c.550m north of the Site (Fig. 4; 1) was discovered in 1936 and recorded on the HER as an unfinished Chellean tool.
- 3.21. The study area contains a high density of Palaeolithic archaeological deposits especially centred towards the north-west of the Site in the River Cray: Valley and Floodplain APA identified by the Greater London Archaeological Advisory Service. The Site is not within the APA so there is low potential for comparable remains such as working surfaces, however the Site does contain superficial head deposits that are known to have potential for unstratified Palaeolithic finds.

#### Mesolithic (10,000 BC - 4000 BC)

3.22. Britain remained part of continental Europe until the Mesolithic period, when rising sea levels transformed it into an island. Britain continued to be inhabited by nomadic or semi-nomadic hunter-gatherer groups. Evidence for Mesolithic activity generally comprises findspots of stone or bone artefacts and evidence of settlement activity tends to be rare and when found often grouped alongside or near to watercourses as these would have been key resources for survival. Across the Greater London area much of the evidence for the Mesolithic consists of isolated finds of flintwork, although other stone, bone and antler artefacts have been recovered from the Thames (MOLA 2002). In situ remains are much more rare however they do exist at sites such as Three Ways Warf in Uxbridge (Lewis 1991).

- 3.23. Within the study area there are high levels of Mesolithic activity recorded on the HER. This includes a possible settlement area c.800m north of the Site (Fig. 4; 8). A number of Mesolithic flint tools have been found on the surface including blades, cores, microblades and scrapers. Furthermore the HER notes the presence of circular discolouration on the surface that could constitute the remains of a seasonal occupation site. However the site has not been excavated so it is impossible to be certain of the origin of these marks. While such sites are known to exist in Britian they are highly uncommon as the majority of Mesolithic societies were nomadic.
- 3.24. Furthermore a Mesolithic buried land surface was encountered on Palm Avenue c.900m to the south-west of Site (Fig. 4; 5). The buried surface consisted of a peat deposit that built up slowly during the Mesolithic period, due to the wet conditions caused by the nearby River Cray. Encountered during an evaluation in 2001 (Fig. 3. E6) the peat deposit was between 1m and 2m thick, it contained fire cracked flints and was dated to the Mesolithic to Iron Age periods (Stevens 2001). While no settlement evidence was recorded in this example it further illustrates the relatively high rate of Mesolithic activity recorded in the within close proximity of the Site.
- 3.25. Additionally plenty of Mesolithic findspots have been recorded within the study area. The Council for British Archaeology (CBA) records the presence of a Mesolithic Tranchet Axe (Fig. 4; 10) from a property on Harvill Road (CBA 2000) c.600m to the west of Site. At Bunkers Hill c.900m north of the Site (Fig. 4; 6) six Mesolithic blades were recorded (CBA 2000). Near Foots Cray c.700m west of the Site close to the western bank of the Cray a 12 cm long flint core (Fig. 4; 7) was located (*ibid.*), this is produced in the process of striking blades from a larger flint, the core is the material remaining once the usable flint has been removed. All these find spots are found in the floodplain of the River Cray, also within the APA. This suggest that floodplain location, with the varied resources available along the river, would have increased the potential for Mesolithic activity. However that does not rule out encountering such artefacts elsewhere, Ruxley Manor Farm c.700m to the south of the Site (Fig. 4; 9) is

farther from the river, despite this the CBA lists 14 blades and flakes recovered from the vicinity of this farm.

3.26. Overall there is a high rate of Mesolithic artefacts encountered within the study area. While the majority were found in the immediate vicinity of the River Cray to the north and west of the Site some of these were found a similar distance from the river as the Site. For this reason it is considered possible that remains of Mesolithic origin will be present on Site.

#### Neolithic (4000 BC - 2400 BC)

- 3.27. The shift into the Neolithic period is characterised by the development of farming and domestication of some plant and animals. This allowed for the adoption of more sedentary lifestyles, which led to the presence of more significant and substantial archaeological remains in the form of early settlement remains and more famously large megalithic ritual landscapes and monuments. Examples of these can be found across the country but most famous are those in the Salisbury Plain region such as Stonehenge and West Kennet long barrow.
- 3.28. There has been little synthesis undertaken on the Neolithic settlement of Kent, although it has been noted as having been largely confined to riverine locations (Bishop 2024). In the Greater-London area the situation is similar; an excavation at Runneymede Bridge (Needham 1991) encountered a number of post holes that may have formed domestic structures, although the majority of the site dated to the Bronze Age. Further evidence is seemingly quite elusive although it may be sealed beneath alluvium of the Thames valley (MOLA 2002).
- 3.29. Within the study area, three findspots are recorded on the HER. Located c.800m to the west of Site a leaf shaped arrowhead (Fig. 4; 11) of pale whitish flint was discovered in the field before the current housing estate was constructed. Just to the north-west of this findspot on the other bank of the Cray, c.700m west of Site, a small Neolithic flaked axehead (Fig. 4; 12) was recovered (Chandler 2013). Finally 650m to the north of Site another leaf shaped arrowhead, made of pale brownish flint, was discovered during laying of pipe for water supply (Fig. 4; 13).
- 3.30. Overall, several Neolithic findspots are present within the study area, although they are all found to the north and west of the Site, within the River Cray floodplain APA. However there are no monuments or features of Neolithic date noted within the study

area, so if remains of this date are encountered they are likely to be isolated unstratified artefacts and therefore contain limited significance.

#### Bronze Age (2400 BC - 700 BC)

- 3.31. During the Bronze Age, settlements continued to grow and develop. Large funerary monuments continued to be established in the form of round barrows often grouped together into cemeteries. These often tend to be associated with both inhumation and cremation burials. Funerary rites during this period are often accompanied by a distinctive assemblage of grave goods. By the Later Bronze Age, the use of bronze tools and weapons is more common, and there is a significant change of focus in the archaeological record towards more visibly sedentary settlement patterns.
- 3.32. In the borough of Havering, directly to the north of Bexley on the north bank of the Thames, the largest Bronze Age hoard in London (third largest in the UK), has been uncovered. This hoard contained over 450 bronze items mainly weapons such as axes spearheads and swords. It is though that this concentration of artefacts may suggest that a highly skilled specialist metal worker was present in the area (Historic England 2019b). Furthermore an excavation in west London in 1991 uncovered some round houses, while possible co-axial field systems were encountered at Muckhatch farm (AGL 2000).
- 3.33. However within the study area the evidence is limited to isolated findspots. Located c.700m to the west of Site a small disk shaped scraper (Fig. 4; 14) was recorded along with 'Neolithic material' during gravel workings in the bank of the River Cray. Furthermore in the far north extent of the study area c.950m north of Site, a cast copper alloy single looped palstave (axe-head) (Fig. 4; 15) was discovered by a metal detectorist in 1994.
- 3.34. Overall the evidence proves that there was activity in the vicinity of Site during the Bronze Age however this evidence is more sparse than the pervious periods. Also there are no record archaeological features, only findspots, and those findspots are both to the west within the River Cray Floodplain. This could suggest that the chances of encountering remains of this period in Site is lower than those of earlier date.

#### Iron Age (700 BC - AD 43)

3.35. The Iron Age is often characterised by the development of greater levels of social stratification as regional tribes coalesced into what could be thought of as primitive examples of early states. Burial practices change compared to earlier periods as less emphasis is put on large burial monuments such as barrows and individual inhumation and cremation burials apparently become more popular. Hillforts are the archetypal Iron Age feature having been constructed in prominent locations across the England although undoubtedly more common in the south and the west. There are a handful of hillforts identified across Greater London, the closest one to Site is Holwood Camp located c.10km to the south-west near Orpington. Holwood Camp is a large multivallate hillfort covering an total area of 43 hectares ringed by two large banks and ditches which can be as wide as 40m total although much of this was levelled by later 19th century landscaping associated with Holwood House (Historic England 2015c). The exact function of these forts is unknown and probably multifaceted. However they likely served as central meeting places for the local population while allowing higher status individuals to exert control over the surrounding hinterland.

3.36. Within the study area there is very limited evidence for Iron Age activity compared to pervious periods. In 2006 during the strip, map and record excavation c.250m north of Site (Fig. 4; 16; Fig. 3; E5), a number of features were recorded. This included a north/south aligned ditch which contained burnt flint as well as grog tempered and wheel thrown pottery indicating a Late Iron Age date. While it is unlikely that the ditches picked up during this excavation will extend over 300m south into Site it does prove that there was Iron Age activity in the area and it is possible that other boundary ditches or field systems of this date may be present. Overall the presence of these features relatively close to the Site does indicate there is a chance similar features will be encountered within the Site.

#### Roman (AD 43 – AD 410)

3.37. The Roman invasion of Britain in AD 43 was followed by the rapid implementation of centralised administration, based on towns and cities. Long distance paved roads linked large, predominantly stone-built, towns and garrisons. The south-east formed the hub of Roman administration of the province of Britania with large forts and cities dotted across the landscape. Where oppida (Iron Age strongholds) did not exist to serve as regional capitals civitas, military engineers helped to found new towns. Colchester (Camulodunum), c.75km to the north-east of the Site, and later London (Londinium), c.20km to the north-west, became the capital of Britannia and were key meeting points for Britons and Romans (Meekums 2001). Watling Street passes roughly 4km to the north of the Site, this was the main road running from London

(Londinium) to Canterbury (Durovernum Cantiacorum), Margary labelled this road as 1c (Margary 1973).

- 3.38. There is evidence for Roman activity in the study area. Constituting both archaeological features such as remains of settlements and bathhouses as well as findspots of ceramics and metal artefacts. Roman occupation evidence was uncovered in Foots Cray Meadows in 1991 by SELAU (Fig. 4; 18; Fig. 3; E3) c.700m west of Site on the west back of the River Cray within the River Cray Floodplain APA. Finds of Roman pottery and tile suggested nearby occupation and a deep deposit of black loam filled with domestic rubbish suggested the remains of a Roman water channel (Greenwood and Thompson 1992).
- 3.39. On the near bank of the River Cray c.500m west of Site, a Roman bathhouse and kitchen complex were discovered (Fig. 3; **E4**) (Fig. 4; **19**). The bathhouse consisted of a 1st century AD apsidal bath, the lead waste pipe and bath tiles were found along with the foundations of huts relating to domestic food production. Evidence for food preparation and butchery was found in the artefacts and domestic rubbish fills, this included sheep shears, butchery knives and tethering chains (Parsons 1956). The HER records four findspots in the vicinity of this settlement, these include various Roman fine and coarse ware pot sherds, tile and other CBM as well as butchered bone (Fig. 4). Clearly there was a concentration of Roman activity on the eastern bank of the River Cray and there is a high likelihood that remains of associated activity, such as field systems may extend east towards Site.
- 3.40. Located in Stable Meadows c.800m to the north of Site a number of features were uncovered in 1990 (Fig. 3; E8) (Fig. 4; 17). A large 2m deep ditch was investigated and dated using Roman pot sherds found stratigraphically above it, and a small Roman pit was also encountered this time containing five sherds of Roman pottery. Nearby finds of a Roman brooch and further pot sherds further indicate the extent of Roman activity in the area.
- 3.41. Overall there is evidence of Roman activity in the vicinity of Site, including domestic activity and a bathhouse, which concentrated between 500 and 800 meters west of the Site. It is therefore considered likely that Roman archaeology may be present within Site, although this would unlikely comprise settlement remains, which would most likely be nearby the two abovementioned locations. Potential remains within the

Site could include unstratified finds or remains of Roman field systems or boundary ditches.

#### Early medieval and medieval (AD 410 – 1539)

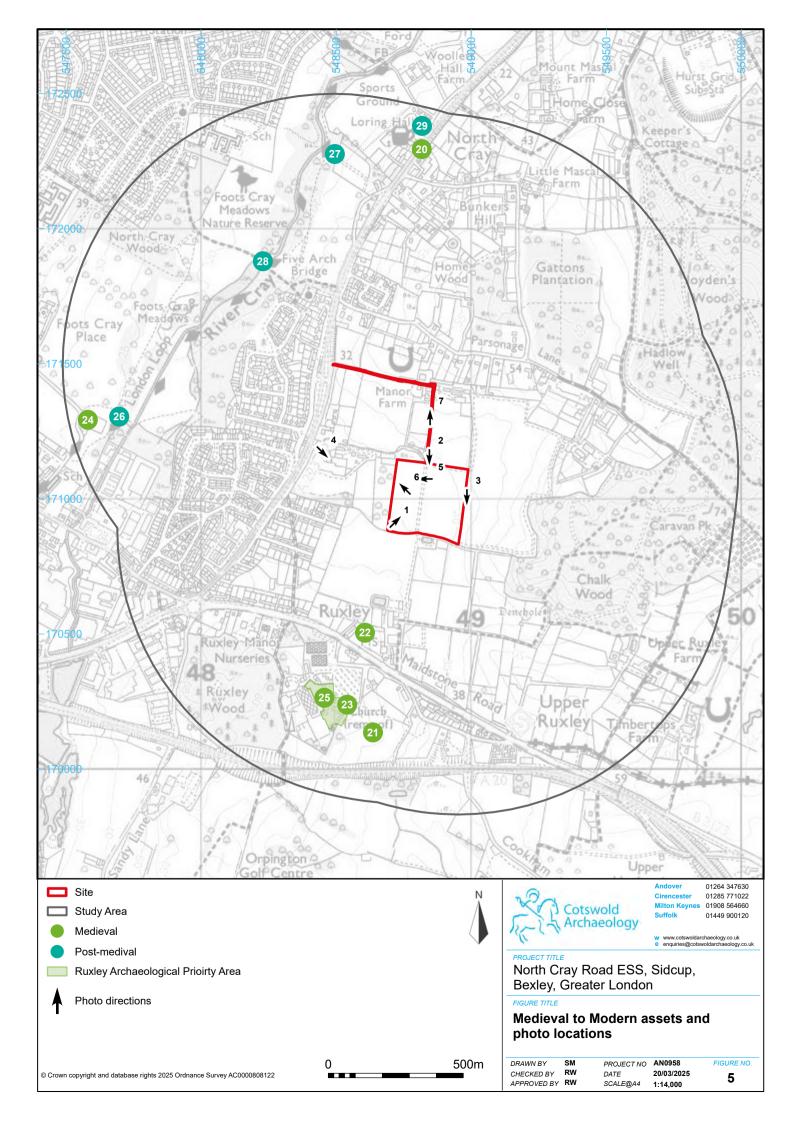
- 3.42. The early medieval and medieval periods are generally characterised by the development of nucleated settlements surrounded by a wider agricultural hinterland. Each settlement was normally either under manorial control or ecclesiastical control. Some of the most common archaeological evidence for this period comes in the form of ridge and furrow earthworks and the remains of medieval field boundaries. Medieval farmland was typically managed using a three field open field system that allowed for rotation of land use to ensure no one land parcel became nutrient deficient. These field systems were further subdivided into strips that were ploughed creating the ridge and furrow earthworks that are evident in many parts of the country.
- 3.43. Within the vicinity of Site two locations, Ruxley and Foots Cray, are mentioned in the Domesday Survey of 1086. At the time of the Survey, Ruxley comprised 10 villagers and 10 smallholders with a total of 4 plough teams, under the lordship of the Bishop of Bayeux (Powell-Smith 2023). While the village of Foots Cray was slightly smaller with only 8 villagers and 4 cottagers and a total of 2.5 plough teams. The medieval village of Ruxley, c. 380m south of Site (Fig. 5; 22), has its roots in the early medieval period. The church in Ruxley c.650m south of Site appears to have had at least three phases of construction (Fig. 5; 23). A timber structure dating to the 9th century AD, thought to be an early church, was replaced by a small two-celled stone church dating to the 11-12th century. Finally the church of St Botolphs was constructed in the 14th century AD (Leonard 1970; Jorgensen 2008) and this was used for a few centuries until it was deconsecrated and converted into a barn, which stands to this day. At the same time the village of Ruxley is thought to have been deserted possibly as a result of the bubonic plaque and integrated into the parish of North Cray. Also associated with the medieval village of Ruxley are a number of metal detecting finds in the field to the south-east of the church (Fig. 5; 21). The finds include a rose farthing and a groat as well as a metal harness fitting.
- 3.44. Further evidence of medieval settlement can be seen c.900m to the north of Site (Fig. 5; 20), here the remains of a rectangular building, though to be a hall house, containing pot sherds dating to the mid 13th century were recovered (Tester 1972). Additionally c.800m to the west of site on the outskirts of Foots Cray lies the Parish Church of All Saints (Fig. 5; 24). This church is thought to have 12th century origins

however the entirety of the exterior has been rebuilt mostly in the 19th century (Historic England 1980).

3.45. Medieval activity within the study area is represented by settlement activity, with associated churches one of which has multiple phases of medieval construction. However none of these are adjacent to Site and it can therefore be suggested that the Site itself was located within agricultural hinterland of the known settlements, likely incorporated into the open field system surrounding Ruxley. As such buried remains associated with medieval agricultural features such as ridge and furrow or boundary ditches may well be present.

#### Post-medieval and modern (1539 – present)

- 3.46. A large post-medieval manor, known as Pyke Place, is recorded c.900m west of Site on the bank of the River Cray (Fig. 5; 26). The property was rebuilt in 1754 by Bourchier Cleeve, a pewterer and financier. The surrounding estate and grounds were known as Foots Cray Place. There are a number of Georgian Buildings within the study area including Loring Hall c.950m north of Site (Fig. 5; 29) which was built in the 1760s. Five Arches Bridge lies within Foots Cray Place c.450m north-west of Site (Fig. 5; 28), this Georgian ornamental bridge allows visitors to the park cross the River Cray. A number of the Listed Buildings within the study area (Fig. 2) also date from the post-medieval and early modern periods.
- 3.47. Just south of the study area the ruins of a large manor known as Scadbury Hall are recorded as being owned by the Walsingham family a powerful group of London lawyers and merchants. Sir Francis Walsingham is thought to have been born here; he would eventually rise to the position of secretary of state to Elizabeth I.
- 3.48. A post-medieval dich is recorded c.800m north of Site (Fig. 5; 27). At 1.7m deep it was a large ditch, probably representing some form of field boundary. Kent Archaeological Unit note that there were no finds in the ditch so the dating is uncertain. While post-medieval development within the study area, mainly in the form of large manors and halls of wealthy London families, is recorded, most of this activity is centred around the River Cray and associated remains are not anticipated to extend into the Site. If remains of this date are encountered on Site they are likely to constitute field boundary ditches.



3.49. The Parish of North Cray Tithe map of 1837 is shown below in Fig. 6. It clearly shows that at the time of survey the Site was located entirely within one field 'Plot 156'. Table 3.2 is an extract from the Tithe Apportionment table. In 1837 the Site was in use as arable land, as were the fields directly to the north, south and east. The archaeological footprint of post-medieval arable agriculture is generally low other than the possibility of surviving ridge and furrow earthworks. The LiDAR Imagery (Fig. 7) clearly shows that no such earthworks are extant today. The Site boundaries to the south and west are formed to this day by hedgerows that as visible as historic boundaries on the Tithe Map from before 1837, these boundaries therefore meet the requirements of 'important hedgerows'.

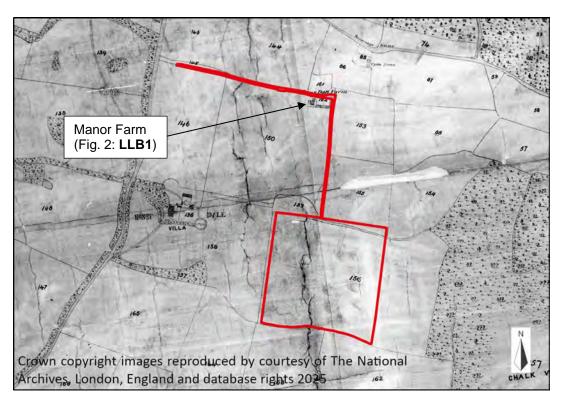


Fig. 6 Parish of North Cray Tithe Map 1837 (Courtesy of the Genealogist)

| Plot | Field Name or<br>Description          | Use     | Owner                       | Occupier        |
|------|---------------------------------------|---------|-----------------------------|-----------------|
| 138  | The Paddock                           | Meadow  |                             | William         |
| 139  | The High and Roadway                  | Pasture | Rt Hon Lord                 | Frederick Steer |
| 154  | Severn Acres                          | Arable  | Bexley                      | John Bath       |
| 155  | The Five Acres                        | Arable  | Deviey                      |                 |
| 156  | Field between the villa and the woods | Arable  |                             |                 |
| 164  | Long Eight Acres                      | Arable  | James<br>Chapman<br>esquire | Samuel Baker    |

Table 3.2 Tithe apportionment table extract (Courtey of the Genealogist)

3.50. The land on the site was owned by the Rt Hon Lord Bexley as was much of the surrounding field and woodland. The Honeydale Villa seen c.250m to the west of the site was also owned by Lord Bexley as was Honeydale Farm, (which also contains the Locally Listed Manor Farm Farmhouse - Fig. 2: **LLB1**) located on the access track c.270m to the north of the Site. Although Honeydale Farm was occupied by John Bath, a tenant farmer who worked much of the land shown above including that which makes up the Site. The farmhouse was extant by the time of the 1837 Tithe Map, and probably dates from the late 18th or early 19th century. By the 1869 Ordnance Survey map (Fig. 8) the name of the farmstead had changed to Manor Farm.

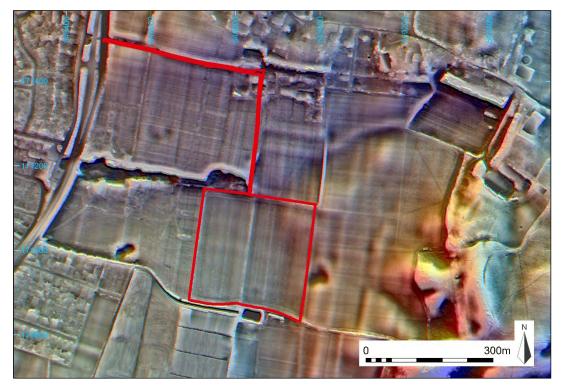


Fig. 7 LiDAR visualisation (DTM SLRM and MHS)

3.51. The LiDAR Digital Terrain Model visualisation shown in Figure 7 shows a depression on the eastern boundary of Site, this appears to be a small dip in the landscape c.40m across north to south. The historic OS maps (see below) show no chalk or gravel extraction activity. If extraction pits were present on Site they would likely have been marked on the OS maps, therefore this is either earlier in origin or a natural feature. During the Site visit on 06/02/25 the feature was visually investigated (Photo 3) and it was decided probably represents an infilled former extraction pit, and given its absence from the OS mapping it is probably post-medieval or earlier.



Photo. 3 View of natural depression identified on LiDAR

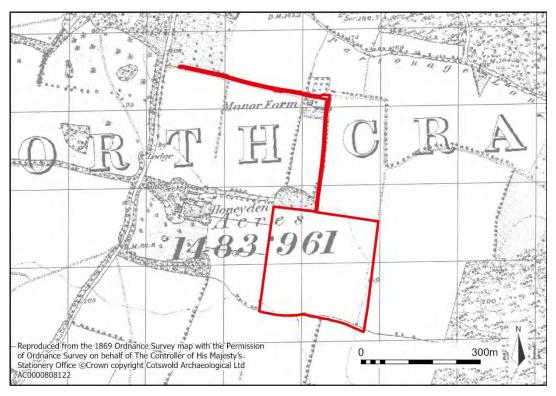


Fig. 8 1st Edition OS Map 1869 (1:10,000)

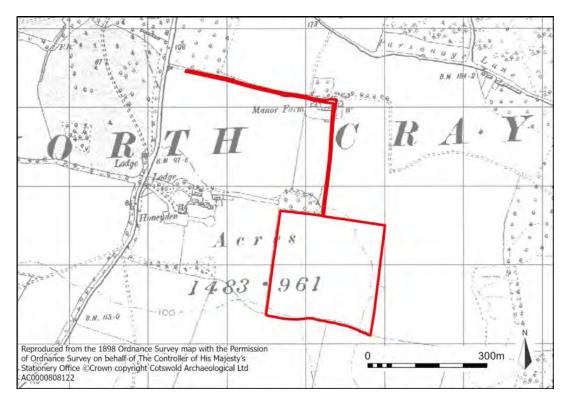


Fig. 9 2nd Edition OS Map 1898 (1:10,000)

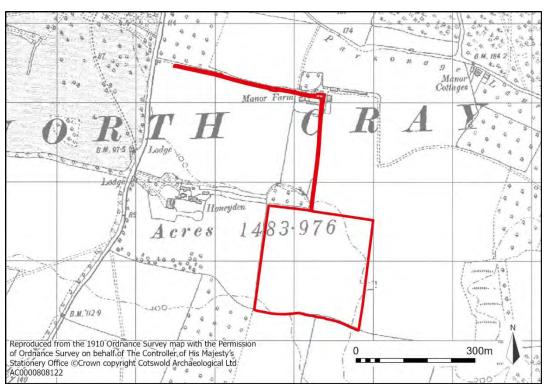


Fig. 10 3rd Edition OS Map 1910 (1:10,000)

3.52. The historic OS mapping for the Site can be used to track changes in the field boundaries and usages on and around the Site. Furthermore any small developments

such as barns or other agricultural outbuildings constructed on or near to the Site can be accurately dated and located. The first edition OS map from 1869 shown in Figure 8 identifies no reason to believe there has been any change to Site since the Tithe Map, the boundaries remain the same and there is no evidence of structures such as barns. To the north of the Site Plot 139 'The High and Roadway' usage has changed; the Tithe Map records it as pasture however by 1869 it is filled with trees so either it has been left to grow or been repurposed as orchard. Furthermore, the two fields to the south-west of Site (including plot 164) present on the tithe map (Fig. 6) have been amalgamated into a single field.

- 3.53. The 1910 OS map in figure 10 does show a new the field boundary to the south-west of the Site not present on the previous map. An orchard was planted in the new field immediately south-west of Site.
- 3.54. The OS map from 1930 (Fig. 11) shows some development, possibly barns associated with the Cray Hall (Fig. 2 LB7) c.200m to the west, in the field immediately to the west of the Site. These structures have since been demolished however satellite imagery and the LiDAR (Fig. 7) show these features in the modern field suggesting there is still some surface remains in the field adjacent to the Site, however nothing is present within the Site itself.

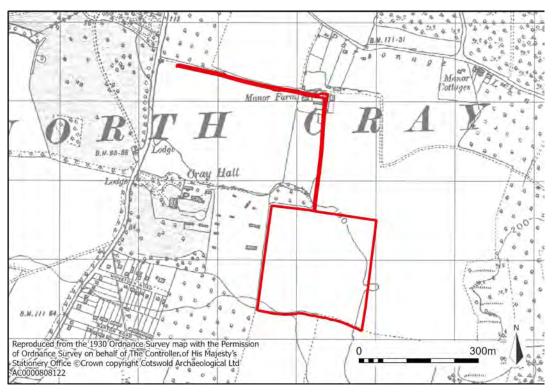


Fig. 11 OS Map 1930 (1:10,000)

- 3.55. The OS map dating to 1961 (Fig. 12) shows the addition of the farm track that makes up the access road for this development running north/south through Site. This is the only direct change to Site identified through historic mapping. This track is still present on Site and effectively splits the field into two although this is not an official field boundary. In 2006 the OS 10k Raster Mapping (Fig. 13) shows the enclosure of the eastern boundary of Site, finally splitting up 'plot 156' into the layout seen on Site today.
- 3.56. In summary there is no evidence for development, with the exception of the farm trackway, within Site on the historic maps or aerial photographs consulted as part of this assessment. There is a possible feature identified on the LiDAR on the eastern boundary of Site, which is likely to be the remains of an infilled extraction pit or possibly a natural feature. The Site is likely to have been utilised as an arable field since the tithe map and probably earlier. In general medieval and post-medieval arable agriculture leaves little other than ridge and furrow in the archaeological record, although within the Site there is no extant evidence of this either which may be as a result of modern ploughing activity. A full list of historic maps consulted as part of this assessment is available in Appendix 3.

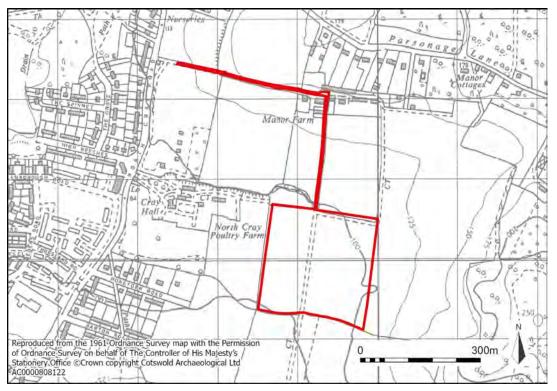


Fig. 12 OS Map 1961 (1:10,000)

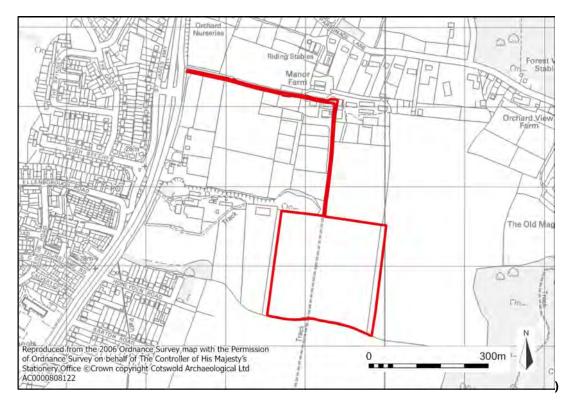


Fig. 13 OS Map 2006 (1:10,000)

# 4. ARCHAEOLOGICAL SIGNIFICANCE & POTENTIAL EFFECTS

## **Previous impacts**

- 4.1. A review of the available cartographic, documentary and photographic evidence indicates that the Site with the exception of the cable route to the north has remained largely undeveloped throughout its documented history. As such, the majority of pre-existing impacts to any potential buried archaeological remains would be confined to upper soil horizons, deriving from earlier agricultural practices, including plough activity, fencing, and land drainage. Ploughing may have had a considerable impact upon any near-surface archaeological features, although any features present in deeper contexts may be better preserved.
- 4.2. The cable route runs north from the Site along the route of the A223 and can be seen in figure 1. It has been omitted from the baseline discussion because it lies entirely within the footprint of the previous impacts of the A223 and therefore will not have any impact on the heritage resource in the area.

## The significance of known and potential archaeological remains within the Site

- 4.3. This assessment has identified that no designated archaeological remains are located within the Site; no designated archaeological remains will therefore be adversely physically affected by development within the Site. Known and potential archaeological remains identified within the Site as considered below by period as appropriate.
- 4.4. It should be noted that all recorded archaeological remains are located in the western half of the study area along the River Cray in the Archaeological Priority Area. There are two potential reasons for this; archaeological remains particularly those of early prehistory are often found along water courses as they are key resources of human survival. Additionally, the western side of the study area is also far more developed, with investigations associated with development leading to a better understanding of the archaeology. The Site lies outside of the River Cray Valley and Floodplain APA and the densest areas of archaeological remains illustrated on Figs 4 and 5 which would suggest we may expect fewer remains to exist within Site.

#### **Prehistoric**

4.5. There is potential for archaeological deposits dating to all prehistoric periods. The presence of the head deposit running through the centre of Site increases the likelihood of encountering Palaeolithic and Mesolithic findspots. The density of

significant artefacts of Palaeolithic and Mesolithic origin (Fig. 3; **1-10**) found within the study area is high, although only to the west of Site in the floodplain of the River Cray (in the APA). Within the Site, located away from the APA and the River Cray, the potential is limited to isolated and unstratified findspots, which would be of interest due to their age and general scarcity in the British archaeological record. The Regional Research Framework for Greater London identifies the need to extend the analysis of the different modes of flint working in prehistoric London (MOLA 2002) therefore any flint findspots have the potential to aid this research aim which would increase their significance.

4.6. There are fewer artefacts recorded within the study area for the later periods of prehistory (Neolithic – Bronze Age) (Fig. 3; 11-15), perhaps indicative of more sporadic activity away of settlement foci, and similarly a relatively limited potential for associated remains to be present within the Site. However, to the north of Site a number of Iron Age ditches (Fig. 3; 16), possibly forming field boundaries, were encountered. Prehistoric co-axial field systems can extend over very large areas and could therefore exist within Site. Such remains would be expected to be of low significance and will not represent an overall constraint on development.

#### Roman

- 4.7. Romano-British archaeological remains are recorded in the western half of the study area, centred around the bathhouse and kitchens (Fig. 4; 19), with records of potentially associated findspots. The regional research framework for Greater London highlights public buildings such as bathhouses as a particular area of interest that needs further work (Regional Research Framework 2002), this could be significant depending on whether bathhouse to the west of the Site is open for public use or privately owned. There are also two Roman occupation Sites to the west (Fig. 4; 18) and north (Fig. 4; 17) of Site and both of which have recovered further artefacts such as pot sherds and domestic refuse.
- 4.8. Whilst the remains discussed above indicate that remains from this period are likely to be encountered within the Site, the significance of any discoveries will depend on the provenance of the features or artefacts. The Site is unlikely to comprise remains associated with those settlements, but finds and features associated with the use of the surrounding hinterland (including, for instance, field boundaries or isolated findspots) cannot be ruled out. The significance of any such remains would be associated with their evidential value on the basis of their ability to contribute to our

understanding of the use of this landscape by Roman communities as set out in the Greater London RRF Roman Research Priorities (MOLA 2002).

#### Medieval and later

- 4.9. This assessment concluded that the Site was located away from known early medieval and medieval settlements and it is more likely that it lay within the open field system of Ruxley. As such, potential archaeological remains associated with medieval activity would likely constitute sub-surface remnants of agricultural features (such as field boundaries or furrows). Ridge and furrow especially where the earthworks have been removed by modern agricultural activity is generally considered to hold low heritage value and therefore will not represent a constraint on development. As documented on historic maps, the Site continued to be utilised as part of the agricultural fieldscape into the 19th and 20th century. Medieval and later buried archaeological features would hold limited, if any, significance. Additionally there is a chance of encountering isolated findspots although these also have limited significance due to their lack of context.
- 4.10. The boundaries of the Site, which consist of hedgerows to the north, south and west, are present on the 1837 tithe map (Fig. 6). Hedgerows along such historic boundaries meet the criteria of 'important' historic hedgerows as laid out in the Hedgerows Regulations (1997) criteria for Archaeology and History (see Appendix 1). 'Important' hedgerows are normally considered to comprise non-designated heritage assets of low heritage value.

#### Potential development effects

- 4.11. No significant known archaeological remains have been identified within the Site, and there is considered to be a low potential for any highly significant unknown archaeological remains to survive buried within the Site. It is anticipated that no highly significant archaeological remains will therefore be truncated by the proposed development.
- 4.12. Any disturbance or truncation (physical development effects) of those less significant archaeological remains identified within the Site would primarily result from groundworks associated with construction. Such groundworks might include:
  - Installation of concrete pads, and/or foundations for any buildings housing equipment (including ESS units/inverter/substation/storage welfare).

- Excavation of the cable trench, service trenches;
- Excavation of foundations for compound fencing, acoustic fencing, and CCTV columns.
- Stripping associated with the construction of access track and temporary works compounds.
- Excavation of any drainage features; and
- landscaping and planting.
- 4.13. Groundworks associated with the development, particularly the excavation of service trenches, access routes and building foundations, may result in the complete truncation of any buried archaeological deposits that may survive within their footprint.
- 4.14. This assessment has identified the potential for archaeological remains to survive within the Site, but it is considered unlikely that such remains would be of sufficient significance to preclude proposed development or influence development design. However, to further understand and record the potential remains, it is likely that further investigations or mitigation will be required at an appropriate stage in the development process. The need for and scope of the investigations should be discussed with the archaeological advisor to the Local Planning Authority.

#### **Hedgerows**

4.15. The available cartographic sources indicate that hedgerows along several boundaries of the Site may comprise 'important' hedgerows under the Hedgerows Regulations (Appendix 1). It is normally desirable to emphasise retention of hedgerows in new development where possible; although removal of elements to facilitate suitable place-making, circulation and access is normally acceptable in heritage terms (without necessarily harming the intelligibility of the hedgerow pattern of the local area). The Proposed Site Layout Plan demonstrates that there will be no changes to any of the boundaries as the only access to the Site is via the existing track from the north, and the hedgerows will be retained as part of the proposal.

# 5. THE SETTING OF HERITAGE ASSETS

5.1. This section considers potential non-physical effects upon the significance of susceptible heritage assets within the Site environs. Non-physical effects are those that derive from changes to the setting of heritage assets as a result of new development. All heritage assets included within the settings assessment are summarised in the gazetteer in Appendix 2, and shown on Figure 2. Those assets identified as potentially susceptible to non-physical impact, and thus subject to more detailed assessment, are discussed in greater detail within the remainder of this section.

# Step 1: Identification of heritage assets potentially affected

- 5.2. Step 1 of the Second Edition of Historic England's 2017 'Good Practice Advice in Planning: Note 3' (GPA3) is to 'identify which heritage assets and their settings are affected' (see Appendix 1). GPA3 notes that Step 1 should identify the heritage assets which are likely to be affected as a result of any change to their experience, as a result of the development proposal (GPA3, page 9).
- 5.3. A number of heritage assets were identified as part of Step 1, as potentially susceptible to impact as a result of changes to their setting (see Figure 2). These assets have been identified using a combination of GIS analysis and field examination, which has considered, amongst other factors, the surrounding topographic and environmental conditions, built form, vegetation cover, and lines of sight, within the context of the assets' heritage significance.
- 5.4. The site visit allowed for the observation of these assets in their extant setting, and as a result, the majority of assets were excluded from the Step 2 assessment due to their distance from the Site, lack of any discernible historic, physical or experiential connections between the assets, and the Site making no contribution to the significance of the assets through being within their setting. The following assets were considered to be potentially sensitive to the proposed development, due to proximity to, or potential inter-visibility with the Site, and was progressed to Steps 2 3:
  - Cray Hall (Grade II; NHLE 1064240; Fig. 2: LB7); and
  - The Locally Listed Manor Farm Farmhouse (Fig. 2: LLB1).
- 5.5. All heritage assets assessed as part of Step 1, but which were *not* progressed to Steps 2-3, are included in the gazetteer in Appendix 2 of this report.

#### Steps 2 – 3: Assessment of setting and potential effects of the development

5.6. This section presents the results of Steps 2 to 3 of the settings assessment, which have been undertaken with regard to those potentially susceptible heritage assets identified in Step 1. Step 2 considers the contribution that setting makes to the significance of potentially susceptible heritage assets. Step 3 then considers how, if at all, and to what extent any anticipated changes to the setting of those assets, as a result of development within the Site, might affect their significance.

# Cray Hall, Grade II Listed (Fig. 2: LB7)

- 5.7. Cray Hall is located c.230m to the west of the Site. The Building was Listed on 17th December 1980 and Listing Description describes the Building as: 'Circa 1830. Formerly called Honeydale. Two storeys. Long symmetrical front; 4 widely spaced sash windows; central doorway with trellised porch, with tented canopy; roughcast; slated hipped roof. Return elevations have 2 windows; southern return has trellised verandah with tented canopy<sup>1</sup>.'
- 5.8. The Listed Building's principal source of significance lies primarily in the historical (illustrative and associative), aesthetic, and evidential values of its built fabric. It is a good example of an early 19th century detached country villa constructed in the former parish of North Cray, when this area was part of the county of Kent. The idea of a rural retreat represented by the country house was maintained and perpetuated on a smaller scale by the villa or detached house. Such villas were often built for occupiers looking to escape the bustle of towns and cities and live in a detached house within its own grounds, but close enough to the town to be able to conduct their business (Historic England 2017a). At the time of the Building's construction the area was a rural landscape and the house and grounds were private and secluded, however this area was also on the fringes of London, being located approximately 10km from the Blackheath area. The area of North Cray was well connected, being located c.4km south of the Roman route of Watling Street, which was the main transport route from London to Canterbury.
- 5.9. The Building therefore illustrates the wealth and standing of the former landowners and occupiers, as well as reflecting the development of the country villa on the fringes of London during the early 19th century. The Listed Building also has a historical association with William Vansittart, 1st Baron Bexley (1766-1851), an English

<sup>&</sup>lt;sup>1</sup> https://historicengland.org.uk/listing/the-list/list-entry/1064240

politician who was one of the longest-serving Chancellors of the Exchequer in British history<sup>2</sup>. He purchased the former Foots Cray Place in 1822 and acquired the estate of North Cray Place in 1833<sup>3</sup>, and was listed as the landowner at the time of the 1837 Tithe Apportionment (Fig. 6). The Building's aesthetic values are inherent in its Regency-style architecture, with its five-bay symmetrical design to the principal (north-west facing) façade, 6/6 and 3/6 sash windows, and decorative detailing including a cast iron porch with pierced standards supporting a swept canopy to the front door (Photo 4) and a trellised veranda with swept canopy to the south elevation.



Photo 4. View of the front (north-west) elevation as viewed from the A223/North Cray Road

Physical Surrounds – 'What Matters and Why'

#### Orientation and aspect

5.10. The principal aspect of the Building is the north-west facing elevation, with its symmetrical façade focused around the entrance door with decorative porch, and flanking bays with sash windows. The Building is orientated on a north-west to southeast axis and the principal façade aligns parallel with the A223 road, but the Building itself is set c. 65m back from the road. The façade overlooks the grounds to the front and historic mapping shows that since the mid-19th century the principal façade has overlooked the entrance driveway. This setting of the house back from the main road is a deliberate feature which provides a sense of separation and privacy from the

<sup>&</sup>lt;sup>2</sup> https://www.historyofparliamentonline.org/volume/1790-1820/member/vansittart-nicholas-1766-1851

<sup>&</sup>lt;sup>3</sup> https://historicengland.org.uk/listing/the-list/list-entry/1000288?section=official-list-entry

main road, but the Building is also placed in such a way as to allow glimpses of the principal façade rather than keeping it completely hidden.

5.11. The orientation of the house was also designed in such a way so that the south-facing façade (which enjoys the best daylight) could enjoy sweeping views over the gardens and grounds to the south of the Building, for which the trellised verandah was built to best enjoy these views. The orientation and aspect of the Building appears to be a deliberate choice of the original design and makes a positive contribution to the Building's significance.

#### Green space, trees and vegetation

- 5.12. The Building is surrounded to all sides by extensive private landscaped gardens, with lawned areas and an abundance of trees and shrubs. These areas were described as 'gardens and pleasure grounds' in the 1837 Tithe Apportionment (Fig. 6). The garden to the south is particularly extensive, stretching as far south as the garden boundaries of properties on Honeyden Road. These gardens form a green oasis which shelters the Building and are in turn sheltered from the road themselves by a boundary screening of mature trees (Photo 4).
- 5.13. In addition to the trees within the gardens immediately surrounding the house, there are extensive treed areas with a mixture of coniferous and deciduous trees and shrubs to the boundaries of the plot to the south, west and north. One of these areas was listed as a plantation on the 1837 Tithe Map (Fig. 6), and the 1869 Ordnance Survey Map depicts these areas as an element of the formal design of the grounds, with pathways meandering through the wooded areas to form part of the pleasure grounds (Fig. 8). Current aerial mapping shows that not only have these wooded areas survived, but that they have survived almost unchanged in arrangement since the 19th century and are directly comparable to the depiction on 19th century mapping. The green spaces, trees and vegetation of the Building's immediate surroundings are an important aspect of the Building's formal design help to facilitate an authentic experience of the heritage asset. These elements of setting therefore make a significant positive contribution to the significance of the Building.

## Openness, enclosure and boundaries

5.14. To the east of the gardens is a large field which forms the eastern boundary of the Building's plot and borders the Site. The field is currently being used as horse paddocks, and in a coincidental example of historic continuity was also listed as 'the

Paddock' on the 1837 Tithe Map (Fig. 6). This field creates a sense of openness and connection to the rural countryside beyond the enclosed and secluded gardens immediately surrounding the house. This field, along with the grounds surrounding the house, appear on mapping from the time of the 1837 Tithe map and have been under the ownership of Cray Hall since that time. Aerial imagery shows that the historic enclosure of the land surrounding the Building has remained apparently unchanged since the date of the Tithe map (and likely since construction of the Building) and the historic plot boundaries are clearly legible, directly corresponding with the boundaries on the historic maps. These elements of setting represent the authentic historical design, layout, and enclosure of the Building's grounds and therefore make a positive contribution to its significance.

- 5.15. The wider setting of the Building beyond its gardens and grounds is a semi-rural landscape, of which all the land to the east of the A223 falls within the Metropolitan Green Belt. To the west of the Building's plot boundary is the busy dual carriageway A223/North Cray Road, which was in existence when the Building was constructed but historically would have been a much smaller road designed for horses and carriages. Beyond this is the modern 20th and 21st development of Foot's Cray which sprawls northwards to the west of the A223. The authentic wider rural setting to the west of the Building has therefore been lost, and this area does not contribute to the significance of the asset through being within its setting.
- 5.16. The land which makes up the wider setting of the Building to the north, east and south falls within the Metropolitan Green Belt and is characterised by a patchwork of fields with some woodland cover some scattered residential and agricultural development. This open land has been encroached upon by modern development such as Honeyden and Barton Roads to the south and Honeydale Farm's polytunnel site to the south-east. The surrounding fields are historically linked to Honeydale Farmstead to the north, and have no particular functional links to the Listed Building having been used for farming where the Building is historically residential. They do provide some information on its historic context as a country retreat which was intentionally located within a rural landscape, and therefore this element of the wider setting makes a broadly positive but limited contribution to the Building's significance.

#### Experience – 'What Matters and Why'

- 5.17. It was not possible to access the immediate setting of the Building due to it being a private property, however it is possible to gain an understanding of its experience through aerial images and from viewing the property from public areas.
- 5.18. The best appreciation of the aesthetic, evidential and historical values of the Building will be gained through the immediate views from within the gardens which surround the asset. As discussed above, the gardens, grounds, woodland planting and historic plot boundaries have survived largely unchanged and remain clearly legible, preserving the historic character of the immediate setting which in turn helps facilitate an authentic experience of the asset. As a dwelling which is set back from the road and surrounded by its own private gardens, the primary experience of being within the immediate setting of the Listed Building will be one of physical seclusion and a sense of enclosure and privacy. It is likely that traffic noise from the A223 road intrudes upon the experience of the immediate setting, which has eroded the authentic experience of the Listed Building to a small degree. However the sounds, sights, and smells of nature in the grounds will still be perceptible and these elements help to facilitate an authentic experience of the asset, and are therefore positive to its significance.
- 5.19. The important views towards Cray Hall which contribute positively towards the experience of the asset are:
  - The immediate views of the Building from within the surrounding gardens and grounds; and
  - The glimpsed views of the Building when viewed from the west on the A223/North Cray Road.
- 5.20. The important views from Cray Hall which contribute positively towards the experience of the asset are:
  - The views from the Building over the surrounding grounds and gardens;
     particular those looking to the south, north and east.

#### Summary of development effects

5.21. The Site adjoins the east boundary of the Listed Building's plot (Photo 5). There is a historic link between the Site and Cray Hall, as they were both under the ownership of the 1st Baron Bexley at the time of the 1837 Tithe Apportionment. The Site itself, however, was part of tenanted grounds which belonged to the farmer of Honeydale Farm and in agricultural use. Although it formed part of the wider estate, it therefore has no functional links to Cray Hall and as such does not make any meaningful contribution to its significance as a residential county villa. The Site otherwise forms a peripheral component of the wider semi-rural setting of the Building which is considered to make a limited positive contribution to its significance.



Photo 5. View from the Site looking west towards the property boundary of Cray Hall



Photo 6. View through the property boundary of Cray Hall to the grounds and outbuilding beyond

5.22. The proposed development would introduce built form into the Site, however the wider semi-rural setting of the Listed Building already includes some modern development such as the residential roads to the south of the Building's property boundary and the large polytunnel site associated with Honeydale Farm to the south of the Site. There is no appreciable intervisibility between the Site and the Listed Building due to the intervening mature hedges and trees along the west boundary of the Site (Photo 6). There is some limited visibility of the paddock and modern

outbuildings to the east of the Listed Building when viewed from the boundary of the Site (Photo 6) however the Listed Building itself is not visible when viewed from the Site due the abundance of trees in the gardens.

The Site itself does not particularly inform the understanding or appreciation of the 5.23. Building as a residential country villa set amongst landscaped gardens and pleasure grounds, and the proposed development would not change the physical character of the Building's immediate setting. The landscape proposals for the proposed development indicate that existing hedgerows along the western boundary of the Site will be positively managed with enhanced vegetation and tree planting, and there will be an introduction of a 3m wide strip of native scrub planting with small trees within the north-west corner of the Site. These mitigation measures would further ensure that there would be no experiential changes from within the Building's immediate setting. It is therefore considered that the proposals will not alter the setting of the Listed Building in a way which would negatively affect its significance or the experience and understanding of its special interest, and that no harm is found. As such, the scheme complies with local policy, the statutory duties under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the guidance of the National Planning Policy Framework 2024.

# **Locally Listed Manor Farm Farmhouse (Fig. 2: LLB1)**

5.24. The Locally Listed Manor Farm Farmhouse is located c.270m to the north of the Site and adjacent to the Site's access route. The building known comprises the former farmhouse of the associated farmstead known as Manor Farm. The building was extant by the time of the 1837 Tithe Map, and probably dates from the late 18th or early 19th century. While no description of the building is provided in the Local List or the HER, from observations made during the site visit it displays some broadly typical features of the Georgian period with its largely symmetrical facades, 8/8 windows and hipped roof forms. It is orientated on an east-west axis with the principal elevation facing west towards the North Cray Road/A223 and is surrounded by private gardens. The building has a double-pile plan, with the west part being one (possibly two) rooms deep with two chimney stacks, and the east part being two-rooms deep with a twostorey projection to the north with one chimney stack (now removed), both under tiled hipped roof structures with a central valley. There is a two storey rear projection to the east side of the north elevation, and a two storey canted bay window to the east elevation which was probably added in the late 19th or early 20th century.

5.25. The heritage significance of Manor Farm Farmhouse is derived from a number of factors. Its evidential value, which substantially contributes to its significance, derives from the tangible physical remains and historic fabric of an 18th to early 19th century farmhouse. The physical fabric of the house also holds aesthetic value in its architectural design, whereby craftsmanship and quality of building materials can be appreciated. The building serves as a surviving example of historic settlement patterns and vernacular architecture, thereby providing it with historical illustrative value.

Physical Surrounds - 'What Matters and Why'

## Aspect and layout

- 5.26. Manor Farm Farmhouse is set within square-shaped well maintained garden plot that is bordered on all sides with a low wooden fence, with an access point for park of vehicles to its north-west. Located to the north on the other side of the lane is a parcel of well-maintained open green space. The farmhouse is located within the north-eastern corner of this garden plot, which is also occupied by tall mature trees within the southern area of the plot. The principal elevation of the farmhouse faces west along its associated access road towards the North Cray Road/A223 and is surrounded by private gardens. This access road to the farmstead is lined either side with mature well maintained hedgerows which were likely established in the post-medieval period and the historic boundaries are depicted on the 1837 North Cray Parish Tithe Map. Located to the immediate west of the farmhouse is its former working farmstead occupied by dilapidated agricultural outbuildings, which the farmhouse overlooks, providing the non-designated asset with its context as a farmhouse.
- 5.27. This garden plot forms the asset's crucial and important setting as a farmhouse to a former working farmstead. The immediately surrounding fields to the south and west, and the east to west lane also make a positive contribution to the non-designated asset's immediate setting, by providing the non-designated asset with a rural and agricultural context and a historic access route to the farmhouse.

#### Functional relationships

5.28. Manor Farm Farmhouse has a functional relationship with the surrounding agricultural landscape as indicated by the tithe apportionment on the 1837 North Cray Parish Tithe Map (Fig. 16), this includes fields that form the Site. That being said, the

Historic Landscape Characterisation states that the Site occupies an area classed 'open countryside' within the Cray Valley, but does not provide a specific date for the fields/landscape that forms the Site. Therefore, it is uncertain whether the field that the Site occupies is contemporary with Manor Farm Farmhouse.

5.29. The relationship with the field that forms the Site is not perceptible within the landscape, although there is an apparent relationship between the fields that immediately surround the non-designated asset due to their proximity. Whilst this historic functional relationship can be only be ascertained from the Tithe Map, Manor Farm Farmhouse is still viewed as a farmhouse and the field that the Site occupies provides a neutral contribution as an element of its physical setting.

# History and change over time

- 5.30. Manor Farm Farmhouse setting has been negatively impacted by the loss of its associated historic agricultural outbuildings over time. The 1837 North Cray Parish Tithe Map (Fig. 6) depicts the farmstead being situated within a rectangular shaped plot with four structures present, this includes Manor Farm Farmhouse and its outbuildings. The arrangement of the farmstead comprises the farmhouse on the western side of the plot and four agricultural buildings such as barns and/or stables arranged in an L-shape to farmhouse's immediate east. The arrange of the barn and house formed a working courtyard to their immediate north.
- 5.31. By the 1869 Ordnance Survey map this arrangement remained the same, but the gardens expanded to the south and a small orchard was established to the immediate north of the farmstead. Additional smaller outbuildings had been constructed by the 1898 Ordnance Survey, along with a long line of outbuildings constructed to the east by the 1910 Ordnance Survey (these buildings survive today).
- 5.32. However, by the 1961 Ordnance Survey all historic agricultural outbuildings had seemingly been demolished and replaced with the outbuildings that are present today. Therefore the farmstead setting of the asset has been negatively impacted upon by the removal of these buildings. The only means of understanding the former historic layout of the farmstead is by viewing historical maps and aerial photographs that predate the 1960s.

#### Summary

5.33. In summary, the Site makes a neutral to positive contribution to the significance of the Locally Listed Manor Farm Farmhouse, mainly through representing parts of the

surrounding agricultural landscape which once formed part of the asset's associated agricultural land. This functional relationship can only be ascertained by viewing the tithe apportionment on the 1837 North Cray Parish Tithe Map. Nonetheless the non-designated asset is the farmhouse of a former working farmstead that is surrounded by agricultural fields to the west, south and east, and these immediate surrounding fields (which does not include the Site) make a positive contribution to the asset's setting.

# Experience - 'What Matters and Why'

- 5.34. The best appreciation of the aesthetic, evidential and historical values of the Locally Listed Manor Farm Farmhouse will be gained through the immediate views from within the gardens which surround the asset. As discussed above, the gardens, grounds, mature trees within its garden plot and historic plot boundaries depicted on the 1869 Ordnance Survey map (Fig. 8) have survived largely unchanged and remain clearly legible within the landscape, preserving the historic character of the immediate setting which in turn helps facilitate an authentic experience of the non-designated asset.
- 5.35. As a farmhouse which is set back from the busy North Cray Road and surrounded by its private garden and its associated modern agricultural outbuildings, the primary experience of being within the immediate setting of the Locally Listed Building will be one of seclusion and a sense of enclosure and privacy. It is likely that traffic noise from the A223 to the west intrudes upon the experience of the immediate setting, which has eroded the sensory experience of the Farmhouse to a small degree. That being said, Manor Farm does not appear to be a working farmstead and it agricultural outbuildings are dilapidated, therefore sights and sounds of a working farmstead are non-existent. The sounds, sights, and smells of nature within the surrounding fields will still be perceptible, and these elements provide a positive contribution to the experience and significance of the non-designated asset.
- 5.36. The important views towards Manor Farm Farmhouse which contribute positively towards the experience of the asset are:
  - The immediate views of the Farmhouse from within the surrounding gardens and grounds; and
  - The views of the Farmhouse when viewed and approaching the nondesignated asset along its access road from the west along its access road.

- 5.37. The important views from Manor Farm Farmhouse which contribute positively towards the experience of the asset are:
  - The views from the Farmhouse over the surrounding grounds and gardens;
     particular those looking to the west over fields, and north and east overlooking its associated agricultural outbuildings and courtyards.

#### Summary of development effects

- 5.38. Despite its proximity, there is no inter-visibility between the Site and Manor Farm Farmhouse due to the intervening mature dense vegetation (Photo 7). Even within the winter months when the site visit was undertaken, the vegetation and leaf cover was still sufficient to block all intervisibility between the proposed development area and the Locally Listed Building. In addition, the landscape proposals for the proposed development indicate that a new tree belt will be planted west to east through the centre of the Site. This belt will be 10m in width and will reach up to 1.5m in height at year one, and 5m in height at year 10. This tree belt will also aid in reducing intervisibility between Manor Farm and the proposed development. Furthermore, the proposed energy storage system will be placed c.400m to the south of the farmhouse. Therefore, the proposed development will not impact upon the setting of the farmstead or its context as a farmhouse with its associated agricultural buildings.
- 5.39. It is not anticipated that the scheme would create a perceptible increase in terms of noise pollution or traffic as it is already positioned close to its access road, and to other residential properties. The access route will also be preserved as part of the proposed development. Any slight increase in traffic along this route would not be incongruous with the historic experience of the asset as a farmhouse within an active farm with machinery and vehicles in operation.
- 5.40. The Site does not inform our understanding or appreciation of the building as a house. Therefore, the primary experience of the asset within its immediate setting will not be impacted, and there will be **no harm** on the significance of the Locally Listed Manor Farm Farmhouse.



Photo 7. View northwards towards Manor Farm Farmhouse from within the Site

# 6. CONCLUSIONS

6.1. This assessment has included a review of a comprehensive range of available sources, in accordance with key industry guidance, in order to identify known and potential heritage assets located within the Site and its environs which may be affected by the proposals. The significance of the identified known and potential heritage assets has been determined, as far as possible, on the basis of available evidence. The potential effects of the proposals on the significance of identified heritage assets, including any potential physical effects upon buried archaeological remains, and potential non-physical effects resulting from the anticipated changes to the settings of heritage assets, have been assessed. Any physical or non-physical effects of the proposals upon the significance of the heritage resource will be a material consideration in the determination of the planning application for the proposal.

# Physical impacts

- 6.2. This report has identified no designated heritage assets within the Site and therefore there will be no detrimental physical impacts upon such assets. However there is potential for the presence of buried archaeological remains within the Site, which could be affected by the groundworks associated with the development. The presence of head deposits within the Site does suggest a potential of isolated unstratified Palaeolithic and Mesolithic findspots, although the key potential is within the River Cray Valley and Floodplain APA c.400m to the west of Site. Furthermore, the potential for the presence of remains associated with Iron Age Roman activity, most likely agricultural remains such as field boundary ditches, cannot be ruled out. From the medieval period onwards, the Site was located within the agricultural landscape, and any remains, such as field boundaries or furrows, would have very limited, if any, significance.
- 6.3. Whilst the groundworks associated with the proposed development would affect any archaeological remains within their footprint, such remains would not present a constraint to development provided that an appropriate programme of investigation and mitigation measures are agreed with the Local Planning Authority.

# Non-physical impacts

6.4. The settings assessment identified one designated heritage asset, Grade II Listed Cray Hall (NHLE 1064240) and one Locally Listed Building, Manor House

Farmhouse, as being potentially sensitive to the proposed development due to their proximity to and potential intervisibility with the Site. The assessment has established the contribution of setting to the significance of Cray Hall and Manor House Farmhouse through the analysis of what matters and why to their significance through their physical and experiential setting. It has examined the contribution of the current Site to the setting of the asset and how the proposed Energy Storage System (ESS) may affect their setting, and if this change is in any way harmful to appreciating and experiencing their significance. The settings analysis has found that the Site forms a peripheral component of the wider semi-rural setting of Cray Hall and Manor House Farmhouse which is considered to make a limited positive contribution to their significance; however, the Site itself makes no meaningful contribution to the significance of Cray Hall and Manor House Farmhouse through being an element of their setting.

6.5. It is therefore considered that the proposals will not alter the setting of the Grade II Listed Cray Hall and Locally Listed Manor House Farmhouse in a way which would negatively affect their significance, or the experience and understanding of their special interest, and that **no harm** is found. As such, the scheme complies with local policy, the statutory duties under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the guidance of the National Planning Policy Framework 2024.

# 7. REFERENCES

- AGL 2000 The archaeology of Greater London: an assessment of archaeological evidence for human presence in the area covered by modern Greater London, MOLA Monogr Ser, London
- Bishop B, J. 2024 *Prehistoric Activity in the Cray Valley: a New Site at Old Bexley* Kent Archaeological Society. Accessed at: <a href="https://www.kentarchaeology.org.uk/journal/123/">https://www.kentarchaeology.org.uk/journal/123/</a>
  <a href="mailto://prehistoric-activity-cray-valley-new-site-old-bexley">https://www.kentarchaeology.org.uk/journal/123/</a>
- British Geological Survey 2025 Geology of Britain Viewer, 1:50,000 geological mapping, bedrock and superficial https://geologyviewer.bgs.ac.uk/
- Cardiff, P. 2007 Sandy Lane, Sidup, DA14: An archaeological evaluation report. MOLA (Museum of London Archaeology). https://doi.org/10.5284/1030020.
- Chandler R, H. 2013 *Implements of Les Eyzies-Type and a Working-Floor in the River Cray Valley.* Proceedings of the Prehistoric Society of East Anglia. 1915;2(1):80-98.
- Chartered Institute for Archaeologists 2020 Standard and Guidance for Historic Environment

  Desk-Based Assessment
- Council for British Archaeology (CBA) 2000 Gazetteer of Mesolithic sites in England and Wales with a Gazetteer of Upper Palaeolithic sites in England and Wales <a href="https://doi.org/10.5284/1000332">https://doi.org/10.5284/1000332</a>
- Darton, L. 2007 Archaeological Strip, Map and Record: St James Rectory, North Cray, Sidcup. Wessex archaeology.
- Greenwood, P. A. and Thompson, A. 1992 Excavation Round-up 1991: Part 2, London Boroughs. *London Archaeologist Vol 6*, pp. 415-423
- Historic England 1980 *Parish Church of all Saints*. Available at: <a href="https://historicengland.org.uk/">https://historicengland.org.uk/</a> listing/the-list/list-entry/1064202?section=official-list-entry
- Historic England 1995 Faesten Dic, a medieval frontier work in Joydens Wood available at: <a href="https://historicengland.org.uk/listing/the-list/list-entry/1012979?section=official-list-entry">https://historicengland.org.uk/listing/the-list/list-entry/1012979?section=official-list-entry</a>
- Historic England 2008 Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment
- Historic England 2010 The Light Fantastic: Using Airborne LiDAR in Archaeological Survey

- Historic England 2013 Ruxley Old Church. <a href="https://historicengland.org.uk/listing/the-list/list-entry/1002026?section=official-list-entry">https://historicengland.org.uk/listing/the-list/list-entry/1002026?section=official-list-entry</a>
- Historic England 2015a Guidelines for Archaeological Projects in Greater London; Greater London Archaeological Advisory Service.
- Historic England 2015b Historic Environment Good Practice Advice in Planning Note 2:

  Managing Significance in Decision-Taking in the Historic Environment
- Historic England 2015c *Holwood Camp* available at: <a href="https://historicengland.org.uk/listing/the-list/list-entry/1002023?section=official-list-entry">https://historicengland.org.uk/listing/the-list/list-entry/1002023?section=official-list-entry</a>
- Historic England 2016a Historic England Advice Note 1: Conservation Area Designation, Appraisal and Management
- Historic England, 2016b Greater London Archaeological Priority Area Guidelines
- Historic England 2017a Domestic 3: Suburban and Country Houses Listing Selection Guide
- Historic England 2017b Historic Environment Good Practice Advice in Planning: Note 3: The Setting of Heritage Assets (Second Edition)
- Historic England 2019 *Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets*
- Historic England 2019b *Largest ever Bronze Age hoard in London discovered* Swindon available at: <a href="https://historicengland.org.uk/whats-new/news/havering-hoard/">https://historicengland.org.uk/whats-new/news/havering-hoard/</a>
- Historic England 2020 London Borough of Bexley: Archaeological Priority Areas Appraisal
- Historic England 2022 *Planning and Archaeology: Historic England Advice Note 17* (HEAN 17)
- Historic England 2023 Curating the Palaeolithic. Historic England, Swindon.
- Historic England 2024 *National Heritage List for England* <a href="https://historicengland.org.uk/listing/the-list/">https://historicengland.org.uk/listing/the-list/</a>
- Jorgensen, P. 2008 An Archaeological Watching Brief at Ruxley Manor Garden Centre, Sidcup, London Borough of Bromley. Brockley: Pre-Construct Archaeology Limited. <a href="https://doi.org/10.5284/1016947">https://doi.org/10.5284/1016947</a>.
- Klemen Zakšek, Krištof Oštir and Žiga Kokalj 2011 *Sky-View Factor as a Relief Visualization Technique. Remote Sensing 3(2): 398-415*
- Kokalj, Žiga and Maja Somrak 2019 Why not a single image? Combining Visualizations to Facilitate Fieldwork and On-Screen Mapping. Remote Sensing 11 (7): 747

- Kokalj, Žiga and Ralf Hesse 2017 Airborne Laser Scanning Raster Visualisation: A guide to Good Practice
- Leonard, M, 1970 'Ruxley Old Church' in Kent Archaeological Review, Issue 20 (Summer 1970), accessed: 27/1/25 from <a href="http://cka.moon-demon.co.uk/KAR020/KAR020">http://cka.moon-demon.co.uk/KAR020/KAR020</a>
  <a href="mailto:xley.htm">xley.htm</a>
- Lewis, J. 1991 Excavation of a Late Glacial and Early Flandrian site at Three Ways Wharf, Uxbridge: interim report, in *The Late Glacial in north-west Europe: human adaptation and environmental change at the end of the Pleistocene* (eds R N E Barton, A J Roberts and D A Roe), CBA Res Rep 77, 246–55, York
- Margary, I. 1973 Roman Roads in Britian
- Meekums, M. 2001 The Upper Cray Valley ORPINGTON AND DISTRICT ARCHAEOLOGICAL SOCIETY
- Ministry for Housing, Communities and Local Government 2024 National Planning Policy Framework (NPPF); published December 2024
- MOLA 2002 Regional Research Framework Greater London
- Natural England 2025 North Kent National Character Area accessed at: <a href="https://national.characterareas.co.uk/North-Kent-Plain/">https://national.characterareas.co.uk/North-Kent-Plain/</a>
- Needham, S. 1991 Excavation and salvage at Runnymede Bridge, 1978: the late Bronze Age waterfront site. London
- Parsons, A. J, J. 1956 Cray Valley Archaeological Report (1952). *Archaeol Cantiana 70. Vol* 70, pp. 262-263
- Powell-Smith, A. 2023 Open Domesday <a href="https://opendomesday.org">https://opendomesday.org</a> (accessed 29/01/25)
- Regional Research Framework 2002 A Research Framework for London Archaeology Available at: <a href="https://researchframeworks.org/rfla/">https://researchframeworks.org/rfla/</a>
- Stevens, S. 2001 An archaeological evaluation (Stage 1) of Land at Palm Avenue/Maidstone Road, Sidcup, LB Bexley Report No 1380. Archaeology South-East
- Tester, P. J. 1972 Discoveries at Hall Place, Bexley. Archaeol Cantiana Vol 86, pp. 209-210
- Planning (Listed Buildings and Conservation Areas) Act 1990 Act of UK Parliament

# **Cartographic sources**

| 1869 | 1st Edition OS Map | 1950 | OS Plan                   |
|------|--------------------|------|---------------------------|
| 1898 | 2nd Edition OS Map | 1974 | OS Plan                   |
| 1910 | 3rd Edition OS Map | 1982 | OS Plan                   |
| 1930 | 4th Edition OS Map | 2006 | 10K Colour Raster Mapping |
| 1938 | 5th Edition OS Map |      |                           |

Additional Ordnance Survey maps viewed at: <a href="http://www.envirocheck.co.uk/">http://www.envirocheck.co.uk/</a> and <a href="http://www.envirocheck.co.uk/">www.maps.nls.uk/geo/find/</a>

# **Aerial Photographs**

| Aeriai Filotograpiis |             |
|----------------------|-------------|
| RAF/3G/TUD/UK/32     | 15-Jan-46   |
| RAF/3G/TUD/UK/32     | 15-Jan-46   |
| RAF/3G/TUD/UK/32     | 15-Jan-46   |
| RAF/106G/UK/1339     | 29-Mar-46   |
| RAF/106G/UK/1339     | 29-Mar-46   |
| RAF/CPE/UK/2065      | 14 MAY 1947 |
| RAF/CPE/UK/2096      | 28 MAY 1947 |
| RAF/541/591          | 29 JUN 1950 |
| RAF/540/656          | 14 JAN 1952 |
| RAF/540/656          | 14 JAN 1952 |
| RAF/540/656          | 14 JAN 1952 |
| RAF/540/636          | 03 DEC 1951 |
| RAF/540/778          | 19 JUN 1952 |
| RAF/540/778          | 19 JUN 1952 |
| RAF/82/1006          | 31 AUG 1954 |
| RAF/82/1006          | 31 AUG 1954 |
| RAF/58/1901          | 18 OCT 1955 |
| RAF/58/1901          | 18 OCT 1955 |
| RAF/58/4626          | 16 AUG 1961 |
| RAF/58/4626          | 16 AUG 1961 |
| RAF/543/2337         | 30 JUL 1963 |
| RAF/543/2337         | 30 JUL 1963 |
|                      |             |

| RAF/543/2337    | 30 JUL 1963 |
|-----------------|-------------|
| FSL/6641/7      | 17 AUG 1966 |
| FSL/6641/7      | 17 AUG 1966 |
| RAF/58/646      | 22 APR 1951 |
| RAF/58/646      | 22 APR 1951 |
| RAF/58/689      | 23 MAY 1951 |
| RAF/58/689      | 23 MAY 1951 |
| RAF/58/689      | 23 MAY 1951 |
| MAL/66031       | 04 JUN 1966 |
| MAL/66031       | 04 JUN 1966 |
| MAL/67021       | 21 MAR 1967 |
| MAL/67021       | 21 MAR 1967 |
| MAL/71087       | 02 JUN 1971 |
| MAL/71087       | 02 JUN 1971 |
| MAL/71097       | 13 JUN 1971 |
| RAF/CPE/UK/2016 | 17 APR 1947 |
| RAF/106G/LA/30  | 07 AUG 1944 |
| RAF/106G/LA/30  | 07 AUG 1944 |
| OS/82189        | 29 AUG 1982 |
| OS/86100        | 13 JUN 1986 |
| OS/92388        | 07 AUG 1992 |
| OS/001023       | 15 DEC 2000 |
| OS/97084        | 08 APR 1997 |
| OS/97219        | 16 AUG 1997 |
| OS/97219        | 16 AUG 1997 |
| OS/89003(Z)     | 30 JAN 1989 |
| OS/89009        | 06 FEB 1989 |
| OS/89009        | 06 FEB 1989 |

# **Online Sources**

https://historicengland.org.uk/listing/the-list/list-entry/1064240

 $\underline{\text{https://www.historyofparliamentonline.org/volume/1790-1820/member/vansittart-nicholas-1766-1851}$ 

https://historicengland.org.uk/listing/the-list/list-entry/1000288?section=official-list-entry

# **APPENDIX 1: HERITAGE STATUTE POLICY & GUIDANCE**

## Heritage Statute: Scheduled Monuments

Scheduled Monuments are subject to the provisions of the Ancient Monuments and Archaeological Areas Act 1979. The Act sets out the controls of works affecting Scheduled Monuments and other related matters. Contrary to the requirements of the Planning Act 1990 regarding Listed buildings, the 1979 Act does not include provision for the 'setting' of Scheduled Monuments.

## Heritage Statute: Listed Buildings

Listed buildings are buildings of 'special architectural or historic interest' and are subject to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Under Section 7 of the Act 'no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised.' Such works are authorised under Listed Building Consent. Under Section 66 of the Act 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any feature of special architectural or historic interest which it possesses'.

#### Note on the extent of a Listed Building

Under Section 1(5) of the Act, a structure may be deemed part of a Listed Building if it is:

- (a) fixed to the building, or
- (b) within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948

The inclusion of a structure deemed to be within the 'curtilage' of a building thus means that it is subject to the same statutory controls as the principal Listed Building. Inclusion within this duty is not, however, an automatic indicator of 'heritage significance' both as defined within the NPPF (2024) and within Conservation Principles (see Section 2 above). In such cases, the significance of the structure needs to be assessed both in its own right and in the contribution it makes to the significance and character of the principal Listed Building. The practical effect of the inclusion in the listing of ancillary structures is limited by the requirement that Listed Building Consent is only needed for works to the 'Listed Building' (to include the building in the list and all the ancillary items) where they affect the special character of the Listed building as a whole.

Guidance is provided by Historic England on '<u>Listed Buildings and Curtilage: Historic England Advice Note 10</u>' (Historic England 2018).

#### Heritage Statue: Conservation Areas

Conservation Areas are designated by the local planning authority under Section 69(1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'), which requires that 'Every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'. Section 72 of the Act requires that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

The requirements of the Act only apply to land within a Conservation Area; not to land outside it. This has been clarified in various Appeal Decisions (for example APP/F1610/A/14/2213318

Land south of Cirencester Road, Fairford, Paragraph 65: 'The Section 72 duty only applies to buildings or land in a Conservation Area, and so does not apply in this case as the site lies outside the Conservation Area.').

The NPPF (2024) also clarifies in <u>Paragraph 220</u> that 'Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance'. Thus land or buildings may be a part of a Conservation Area, but may not necessarily be of architectural or historical significance. Similarly, not all elements of the setting of a Conservation Area will necessarily contribute to its significance, or to an equal degree.

# National heritage policy: the National Planning Policy Framework

#### Heritage assets and heritage significance

Heritage assets comprise 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest' (the NPPF (2024), Annex 2). Designated heritage assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas (designated under the relevant legislation; NPPF (2024), Annex 2). The NPPF (2024), Annex 2, states that the significance of a heritage asset may be archaeological, architectural, artistic or historic. Historic England's 'Conservation Principles' looks at significance as a series of 'values' which include 'evidential'. 'historical', 'aesthetic' and 'communal'.

The July 2019 revision of the Planning Practice Guidance (PPG) expanded on the definition of non-designated heritage assets. It states that 'Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.' It goes on to refer to local/neighbourhood plans, conservation area appraisals/reviews, and importantly, the local Historic Environment Record (HER) as examples of where these assets may be identified, but specifically notes that such identification should be made 'based on sound evidence', with this information 'accessible to the public to provide greater clarity and certainly for developers and decision makers'.

This defines *non-designated heritage assets* as those which have been specially defined as such through the local HER or other source made accessible to the public by the plan-making body. Where HERs or equivalent lists do not specifically refer to an asset as a *non-designated heritage asset*, it is assumed that it has not met criteria for the plan-making body to define it as such, and will be referred to as a *heritage asset* for the purpose of this report.

The assessment of *non-designated heritage assets* and *heritage assets* will be equivalent in this report, in line with industry standards and guidance on assessing significance and impact. They may not, however, carry equivalent weight in planning as set out within the provisions of the NPPF, should there be any effect to significance.

#### The setting of heritage assets

The 'setting' of a heritage asset comprises 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral' (NPPF (2024), Annex 2). Thus it is important to note that 'setting' is not a heritage asset: it may contribute to the value of a heritage asset.

Guidance on assessing the effects of change upon the setting and significance of heritage assets is provided in 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets', which has been utilised for the present assessment (see below).

# Levels of information to support planning applications

<u>Paragraph 207</u> of the NPPF (2024) identifies that 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.

#### **Designated heritage assets**

Paragraph 202 of the NPPF (2024) explains that heritage assets 'are an irreplaceable resource and should be conserved in a manner appropriate to their significance'. Paragraph 212 notes that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Paragraph 213 goes on to note that 'substantial harm to or loss of a grade II listed building...should be exceptional and substantial harm to or loss of designated heritage assets of the highest significance (notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites)...should be wholly exceptional'.

<u>Paragraph 215</u> clarifies that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use'.

# **Development Plan**

#### POLICY DP14 Development affecting a heritage asset

#### Impact on asset or setting

- Development proposals with the potential to directly or indirectly impact on a heritage asset or its setting should meet NPPF requirements to describe the significance of the asset and demonstrate how the proposal conserves or enhances the significance of the asset.
- 2. Development proposals on sites with existing heritage assets, particularly listed or locally listed buildings, should incorporate those assets. Outline applications will not generally be acceptable for developments that include heritage assets.

# Change of use

3. Any development proposal to alter or change the use of a heritage asset will need to conserve or enhance that asset; proposals must demonstrate how the change will support the building's preservation and future maintenance. Development proposals should restore, re-use and incorporate heritage assets, wherever possible. Proposals must demonstrate that the new use would not adversely affect the fabric of the building.

#### Demolition

- 4. There is a general presumption against any proposal for development that demolishes a heritage asset in part or whole, including locally listed buildings.
- 5. Proposals to demolish buildings within Conservation Areas will be considered with regards to the NPPF approach to determining harm and will generally be refused unless it can be demonstrated that the development proposal would enhance the special character of the area; demolition will not be approved until consent for the replacement building is agreed.

### Listed buildings

6. Any proposed alteration must have regard for conserving or enhancing the special character of the building, both internally and externally. Replacement materials should be like for like or, where this is not possible or not preferable, should be compatible with the existing character of the building, either by sympathetically matching or contrasting.

# Non-designated heritage assets

- 7. Any proposed alteration to a non-designated heritage asset, including locally listed buildings, structures and landscapes, must have special regard to the asset's contribution to the streetscape.
- 8. Any proposed alteration to a non-designated heritage asset, including locally listed buildings, structures and landscapes, should conserve the particular characteristics that justify its identification.

#### Conservation areas

9. Proposals for development within Conservation Areas must have due regard to the area appraisal and management plan in terms of design, use, and any other element identified as relevant.

#### Archaeological evidence

10. Development proposals should be assessing the archaeological potential of sites and then retaining, in situ, archaeological evidence within sites, wherever possible. Where archaeological evidence cannot be retained, the appropriate levels of archaeological investigation and recording should be undertaken prior to the redevelopment of the site.

#### **Good Practice Advice 1-3**

Historic England has issued three Good Practice Advice notes ('GPA1-3') which support the NPPF. The GPAs note that they do not constitute a statement of Government policy, nor do they seek to prescribe a single methodology: their purpose is to assist local authorities, planners, heritage consultants, and other stakeholders in the implementation of policy set out in the NPPF. This report has been produced in the context of this advice, particularly 'GPA2 – Managing Significance in Decision-Taking in the Historic Environment' and 'GPA3 – The Setting of Heritage Assets'.

#### **GPA2 - Managing Significance in Decision-Taking in the Historic Environment**

GPA2 sets out the requirement for assessing 'heritage significance' as part of the application process. Paragraph 8 notes 'understanding the nature of the significance is important to

understanding the need for and best means of conservation.' This includes assessing the extent and level of significance, including the contribution made by its 'setting' (see GPA3 below). GPA2 notes that 'a desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so' (Page 3).

#### **GPA3 – The Setting of Heritage Assets**

The NPPF (Annex 2: Glossary) defines the setting of a heritage asset as 'the surroundings in which a heritage asset is experienced...'. Step 1 of the settings assessment requires heritage assets which may be affected by development to be identified. Historic England notes that for the purposes of Step 1 this process will comprise heritage assets 'where that experience is capable of being affected by a proposed development (in any way)...'.

Step 2 of the settings process 'assess[es] the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated', with regard to its physical surrounds; relationship with its surroundings and patterns of use; experiential effects such as noises or smells; and the way views allow the significance of the asset to be appreciated. Step 3 requires 'assessing the effect of the proposed development on the significance of the asset(s)' – specifically to 'assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it', with regard to the location and siting of the development, its form and appearance, its permanence, and wider effects.

Step 4 of GPA3 provides commentary on 'ways to maximise enhancement and avoid or minimise harm'. It notes (Paragraph 37) that 'Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development liable to affect its setting are considered from the project's inception.' It goes on to note (Paragraph 39) that 'good design may reduce or remove the harm, or provide enhancement'.

#### Heritage significance

Discussion of heritage significance within this assessment report makes reference to several key documents. With regard to Listed buildings and Conservation Areas it primarily discusses 'architectural and historic interest', which comprises the special interest for which they are designated.

The NPPF provides a definition of 'significance' for heritage policy (Annex 2). This states that heritage significance comprises 'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be <u>archaeological</u>, <u>architectural</u>, <u>artistic</u> or <u>historic'</u>. This also clarifies that for World Heritage Sites 'the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance'.

Regarding 'levels' of significance the NPPF (2024) provides a distinction between: designated heritage assets of the highest significance; designated heritage assets not of the highest significance; and non-designated heritage assets.

Historic England's 'Conservation Principles' expresses 'heritage significance' as comprising a combination of one or more of: evidential value; historical value; aesthetic value; and communal value:

• Evidential value – the elements of a historic asset that can provide evidence about past human activity, including physical remains, historic fabric, documentary/pictorial records.

This evidence can provide information on the origin of the asset, what it was used for, and how it changed over time.

- Historical value (illustrative) how a historic asset may illustrate its past life, including changing uses of the asset over time.
- Historical value (associative) how a historic asset may be associated with a notable family, person, event, or moment, including changing uses of the asset over time.
- Aesthetic value the way in which people draw sensory and intellectual stimulation from a historic asset. This may include its form, external appearance, and its setting, and may change over time.
- Communal value the meaning of a historic asset to the people who relate to it. This may
  be a collective experience, or a memory, and can be commemorative or symbolic to
  individuals or groups, such as memorable events, attitudes, and periods of history. This
  includes social values, which relates to the role of the historic asset as a place of social
  interactive, distinctiveness, coherence, economic, or spiritual / religious value.

#### Effects upon heritage assets

#### Heritage benefit

The NPPF clarifies that change in the setting of heritage assets may lead to heritage benefit. Paragraph 219 of the NPPF (2024) notes that 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'.

GPA3 notes that 'good design may reduce or remove the harm, or provide enhancement' (Paragraph 28). Historic England's 'Conservation Principles' states that 'Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effects on heritage values. It is only harmful if (and to the extent that) significance is reduced' (Paragraph 84).

Specific heritage benefits may be presented through activities such as repair or restoration, as set out in Conservation Principles.

#### Heritage harm to designated heritage assets

The NPPF (2024) does not define what constitutes 'substantial harm'. The High Court of Justice does provide a definition of this level of harm, as set out by Mr Justice Jay in *Bedford Borough Council v SoS for CLG and Nuon UK Ltd.* Paragraph 25 clarifies that, with regard to 'substantial harm': 'Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced'.

#### Effects upon non-designated heritage assets

The NPPF (2024) <u>paragraph 216</u> guides that 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

## Hedgerows Regulations, 1997

The 1997 Hedgerows Regulations were made under section 97 of the Environment Act 1995, and introduced arrangements for Local Planning Authorities to protect 'important' hedgerows in the countryside, by controlling their removal through a system of notification. The DEFRA publication 'The Hedgerows Regulations 1997: A Guide to the Law and Good Practice' is a useful guide in this respect. The Regulations provide criteria for assessing whether a hedgerow is 'important' for the purposes of the Regulations. To qualify as 'important' a hedgerow must have existed for 30 years or more and following this must fulfil at least one of the criteria in the Schedule 1 criteria. Those for 'archaeology and history' comprise Part II, namely:

- 1. The hedgerow marks the boundary, or part of the boundary, of at least one historic parish or township; and for this purpose "historic" means existing before 1850.
- 2. The hedgerow incorporates an archaeological feature which is-
  - (a) included in the schedule of monuments compiled by the Secretary of State under section 1 (schedule of monuments) of the Ancient Monuments and Scheduled Areas Act 1979(g); or
  - (b) recorded at the relevant date in a Sites and Monuments Record [Historic Environment Records have largely replaced Sites and Monuments Records].
- 3. The hedgerow-
  - (a) is situated wholly or partly within an archaeological site included or recorded as mentioned in paragraph 2 or on land adjacent to and associated with such a site; and (b) is associated with any monument or feature on that site.
- 4. The hedgerow-
  - (a) marks the boundary of a pre-1600 AD estate or manor recorded at the relevant date in a sites and Monuments Record or on a document held at that date at a Record Office: or
  - (b) is visibly related to any building or feature of such an estate or manor.
- 5. The hedgerow-
  - (a) is recorded in a document held at the relevant date at a Record Office as an integral part of a field system pre-dating the Inclosure acts(a); or
  - (b) is part of, or visibly related to, any building or other feature associated with such a system, and that system-
    - (i) is substantially complete; or
    - (ii) is of a pattern which is recorded in a document prepared before the relevant date by a local planning authority, within the meaning of the 1990 Act(b), for the purposes of development control within the authority's area, as a key landscape characteristic

The criterion of point five is the subject of debate and differing interpretation. Some heritage professionals interpret the criterion referring to the individual Inclosure Act for the parish in which a site is located, and numerous Acts were made in the 18th century (including the 1773 Inclosure Act). However, the criterion references the Short Titles Act of 1896, and it is commonly interpreted by LPAs and heritage professionals that it thus refers to the Inclosure Act of 1845, and subsequent Acts up to the Commonable Rights Compensation Act of 1882. This latter interpretation sets a date of 1845 as the benchmark test.

'Important' hedgerows are not designated heritage assets (as defined in NPPF Annex 2). The Regulations are essentially a notification mechanism. Thus an applicant needs to notify the LPA prior to the removal, either entirely or in part, of an 'important' hedgerow. There is a prescribed form of notice set out in Schedule 4 to the Regulations, although the form an LPA uses does not have to follow this. The requirement is for sufficient information to be given to the LPA for them to consider the proposed removal.

# APPENDIX 2: GAZETTEER OF SELECTED RECORDED HERITAGE ASSETS

| Ref. | Description  | Grade/Period                       | NGR            | HE ref.<br>HER ref.<br>HEA ref. |
|------|--|------------------------------------|----------------|---------------------------------|
| SM1  | Ruxley Old Church  | Scheduled<br>Monument              | TQ 48528 70244 | 1002026                         |
| RPG1 | Foots Cray Place   | Grade II Registered park and Grden | TQ 47409 71818 | <b>1000288</b> 1358021          |
| CA1  | North Cray Village   | -                                  | 548727 172246  | 4827                            |
| CA2  | High Beeches   | -                                  | 548310 171348  | 4848                            |
| LB1  | Parish Church Of All Saints  | II*                                | TQ 47579 71293 | 1064202                         |
| LB2  | Ruxley Farmhouse   | II                                 | TQ 48447 70269 | 1038317                         |
| LB3  | Granary At Little Mascal Farm  | II                                 | TQ 49197 72154 | 1064210                         |
| LB4  | Number 152 (Rose Cottage) and<br>Number 154  | II                                 | TQ 48803 72307 | 1064237                         |
| LB5  | Parish Church Of St James  | II                                 | TQ 48406 71755 | 1064238                         |
| LB6  | Tomb of Frances Madocks to south side<br>of Parish Church of St James  | II                                 | TQ 48409 71742 | 1064239                         |
| LB7  | Cray Hall  | II                                 | TQ 48481 71142 | 1064240                         |
| LB8  | Five Arch Bridge   | Ш                                  | TQ 48227 71880 | 1188471                         |
| LB9  | Two Chest Tombs to east side of Parish<br>Church of St James   | II                                 | TQ 48426 71756 | 1188479                         |
| LB10 | Old Church of St Botolph   | II                                 | TQ 48528 70244 | 1261527                         |
| LB11 | Walls surrounding and to west and<br>south-west of Parish Church of St<br>James and Gatepiers and Gates to west<br>of Church | II                                 | TQ 48385 71759 | 1359414                         |
| LB12 | Richard Klinger Factory II TQ 47785 70477  |                                    | TQ 47785 70477 | 1387704                         |
| LB13 | Dower House  | II                                 | TQ 48751 72138 | 1294717                         |
| LB14 | Loring Hall II TQ 48816 72381  |                                    | TQ 48816 72381 | 1359399                         |
| LB15 | North Cray War Memorial  | II                                 | TQ 48429 71761 | 1444904                         |
| LLB1 | Manor Farm Farmhouse   | Non-designated                     | TQ 48822 71412 | -                               |

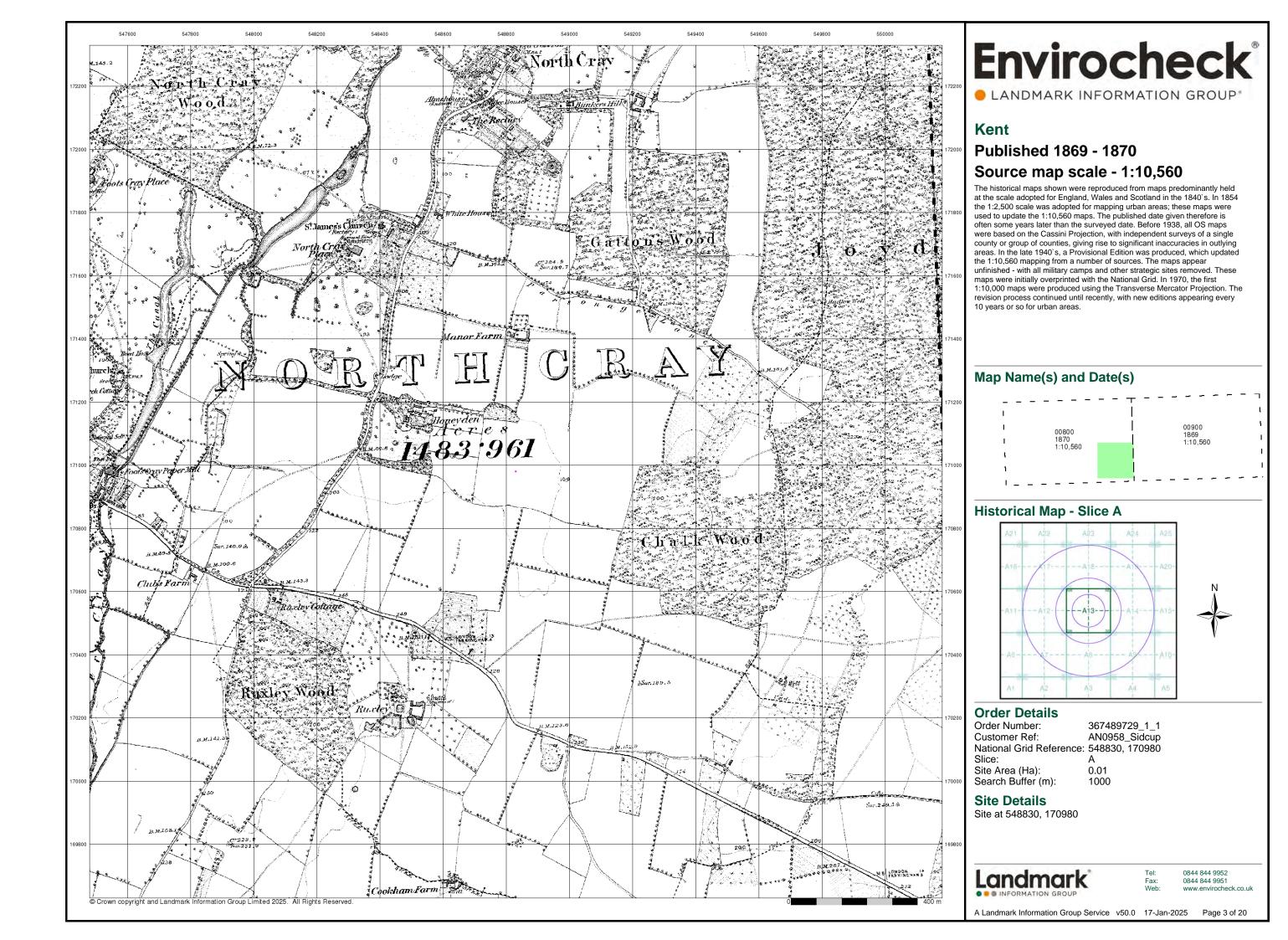
| Ref.       | Description  | Grade/Period   | NGR            | HE ref.<br>HER ref.<br>HEA ref. |
|------------|--|--|----------------|---------------------------------|
| E1         | Excavation at Ruxley Old Church  | -  | TQ 48523 70240 | 155430                          |
| E2         | Trial Trench at 24 Mount Culver Avenue   | -  | TQ 47914 70722 | 172087                          |
| E3         | Trial Trench at Foots Cray Meadows   | -  | TQ 47805 71705 | 152253                          |
| E4         | Excavation at Palm Avenue  | -  | TQ 47955 71186 | 152725                          |
| <b>E</b> 5 | Strip Map And Sample at St James' Rectory  | -  | TQ 48455 71721 | 154290                          |
| <b>E</b> 6 | Trial Trench at Palm Avenue/Maidstone<br>Road                                      | -  | TQ 47795 70763 | 153508                          |
| E7         | Trial Trench at Sandy Lane   | -  | TQ 47854 70210 | 157911                          |
| E8         | Watching Brief at North Cray Road - TQ 48470 72275                                 |  | TQ 48470 72275 | 156237                          |
| 1          | The Grove Vicinity Of (Palaeolithic findspot)  Palaeolithic TQ 485                 |  | TQ 48550 72050 | 98045                           |
| 2          | East Bank Of River Cray (Upper Palaeolithic lithic working site)                   | Palaeolithic   | TQ 48004 71104 | 135511                          |
| 3          | North Cray Gravel Pit (Upper Palaeolithic lithic working site)                     | Palaeolithic   | TQ 47749 71450 | 112099                          |
| 4          | Baugh Road (Upper Palaeolithic lithic working site)  Palaeolithic TQ 47444 71246   |  | 140381         |                                 |
| 5          | 1-31 Palm Avenue (Early Mesolithic buried land surface)  Mesolithic TQ 47799 70766 |  | 118775         |                                 |
| 6          | Bunkers Hill (Mesolithic findspot)   | Bunkers Hill (Mesolithic findspot) Mesolithic TQ 49150 72350 |                | 99130                           |
| 7          | Foots Cray (Mesolithic findspot)   | Foots Cray (Mesolithic findspot) Mesolithic TQ 47749 71550   |                | 131543                          |
| 8          | Stable Meadow Allotments (Mesolithic Occupation Site)  Mesolithic TQ 48605         |  | TQ 48605 72205 | 121511<br>408010                |
| 9          | Ruxley Manor Farm (Mesolithic findspot) Mesolithic TQ 48505 70205                  |  | TQ 48505 70205 | 124776                          |
| 10         | 9 Harvill Road (Mesolithic findspot) Mesolithic TQ 48033 71128                     |  | 129860         |                                 |
| 11         | Foots Cray (Neolithic findspot) Neolithic TQ 47984 71084                           |  | TQ 47984 71084 | 95807                           |
| 12         | Foots Cray Bank Of Cray River (Neolithic findspot)                                 | Neolithic TQ 47749 71450                                     |                | 138949                          |
| 13         | Stable Meadow Allotments (Neolithic findspot)                                      | nts (Neolithic Neolithic TQ 48554 72205                      |                | 126015<br>408013                |
| 14         | Foots Cray (Bronze Age findspot) Bronze Age TQ 47984 71084                         |  | 137016         |                                 |

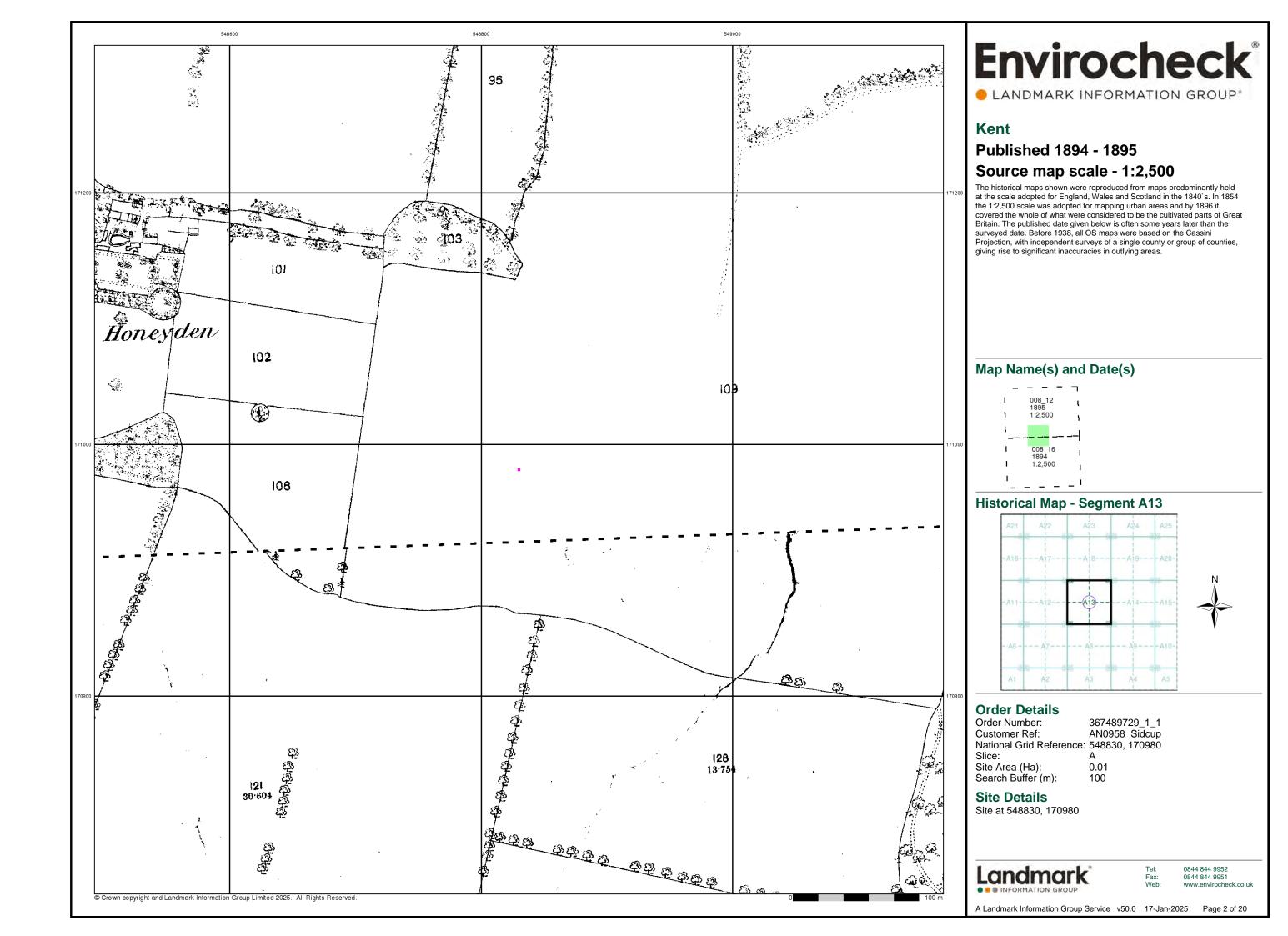
| Ref.         | Description   | Grade/Period  | NGR            | HE ref.<br>HER ref.<br>HEA ref. |
|--------------|---|---------------|----------------|---------------------------------|
| 15           | North Cray Road, North Cray (Middle<br>Bronze Age findspot) | Bronze Age    | TQ 48499 72400 | 101269                          |
| 16           | St James Rectory (Late Iron Age ditch)                      | Iron Age      | TQ 48459 71723 | 95900                           |
| 17           | Stable Meadow (Roman pit)                                   | Roman         | TQ 48469 72274 | 128562                          |
| 18           | Foots Cray Meadows (Roman occupation site)                  | Roman         | TQ 47804 71705 | 151592                          |
| 19           | Palm Avenue (Roman occupation layer)                        | Roman         | TQ 47955 71184 | 123450<br><i>4080</i> 22        |
| 20           | North Cray Road (Medieval house & outbuilding)              | Medieval      | TQ 48815 72295 | 100625                          |
| 21           | Cookham Road (Medieval findspot)                            | Medieval      | TQ 48605 70205 | 139812                          |
| 22           | Ruxley (medieval village & deserted settlement)             | Medieval      | TQ 48605 70504 | 124806                          |
| 23           | Ruxley Old Church (Pre-conquest church)                     | Medieval      | TQ 48539 70238 | 95202                           |
| 24           | Parish Church of All Saints                                 | Medieval      | TQ 47579 71293 | 148054                          |
| 25           | Ruxley Archaeological Priority Area -<br>Tier I             | Medieval      | TQ 48475 70238 | 78311                           |
| 26           | Rectory Lane (Post-medieval house)                          | Post-medieval | TQ 47694 71305 | 108359                          |
| 27           | Stable Meadow (Post-medieval ditch)                         | Post-medieval | TQ 48493 72276 | 139459                          |
| 28           | Five Arch Bridge  | Post-medieval | TQ 48227 71880 | 99845                           |
| 29           | Loring Hall   | Post-medieval | TQ 48816 72380 | 151238                          |
| Find spot    | Colour coated sherd found 1956                              | Roman         | TQ 47904 71104 | 121513                          |
| Find spot    | Pot tile and bone found in 1981                             | Roman         | TQ 48155 71235 | 136340                          |
| Find spot    | Coarse Romano British pottery found 1935                    | Roman         | TQ 47904 70904 | 143947                          |
| Find<br>Spot | Miscellaneous pot sherds found 1955 Roman TQ 4              |               | TQ 47745 70575 | 107550                          |

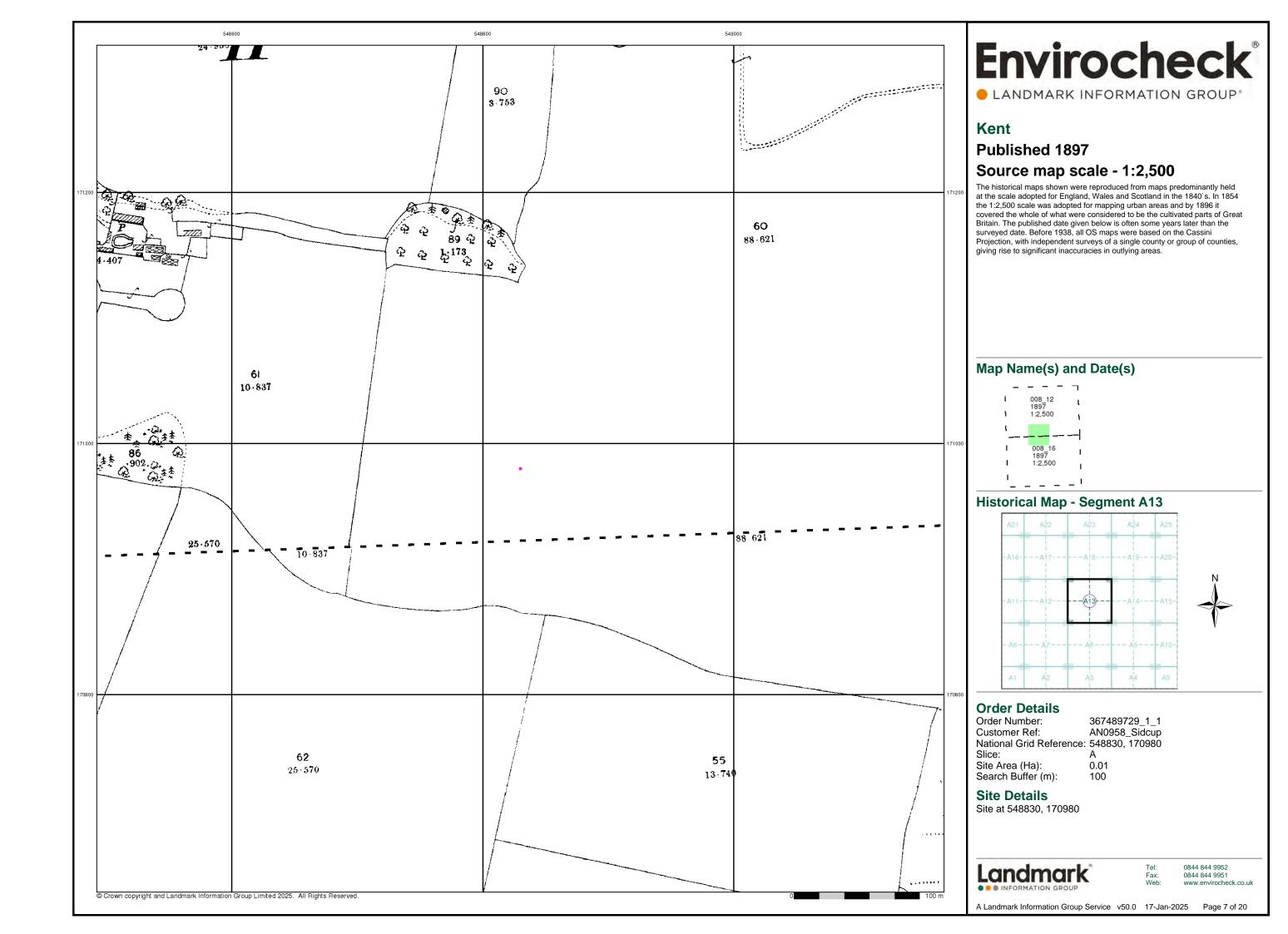
# **Archaeological Priority Areas**

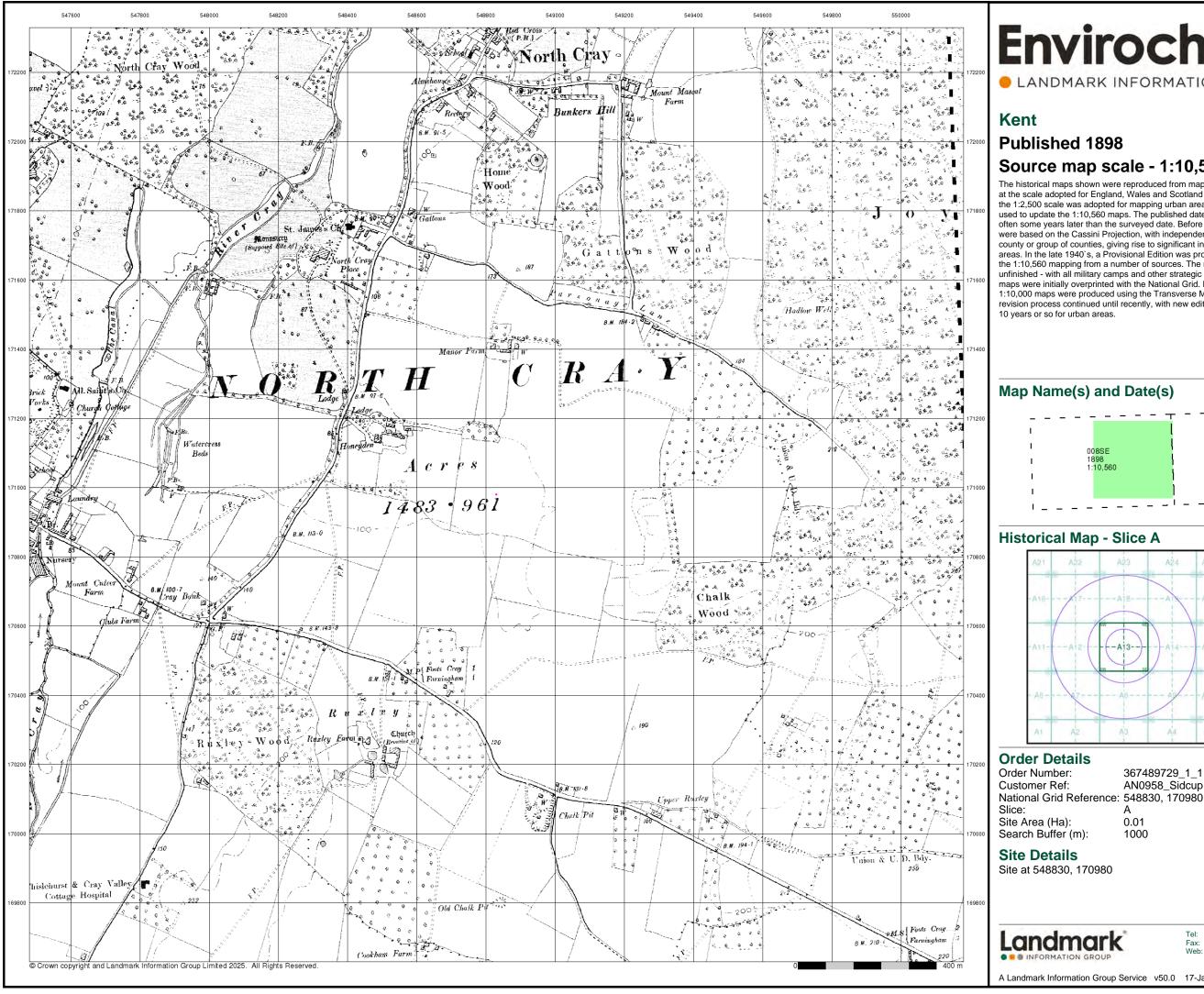
| Name                                 | Tier | Description   |
|--------------------------------------|------|---|
| Ruxley                               | I    | This APA contains the small medieval settlement of Ruxley and the Scheduled Ancient Monument of Ruxley Old Church.  |
| River Cray: Valley and Floodplain    | II   | Significant prehistoric potential including Palaeolithic and Mesolithic findspots associated with the Crayford silt deposits. This includes material from at least two separate working floors and a large assemblage of flakes, cores, blades and other tools and debitage. The assemblage generally dates from the Upper Palaeolithic. Plentiful Roman and medieval remains also exists across the APA including a possible early medieval church.  |
| Upper Cray Valley<br>and Flood Plain | III  | The Archaeological Priority Area covers a large expanse of agricultural land, historic commons and ancient woodland immediately to the east of the River Cray. Areas of ancient woodland and commons are of archaeological interest for their own sake and as islands of preservation of earlier features. The APA contains archaeological remains dating to the prehistoric, Roman, medieval and postmedieval periods as well as undated cropmark and earthwork features and numerous findspots. |

# **APPENDIX 3: HISTORIC ORDNANCE SURVEY MAPPING**







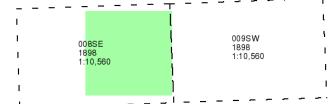


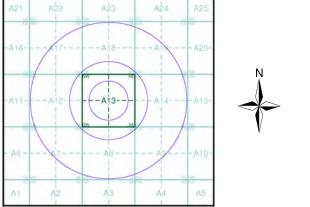
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# Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every





AN0958 Sidcup National Grid Reference: 548830, 170980

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