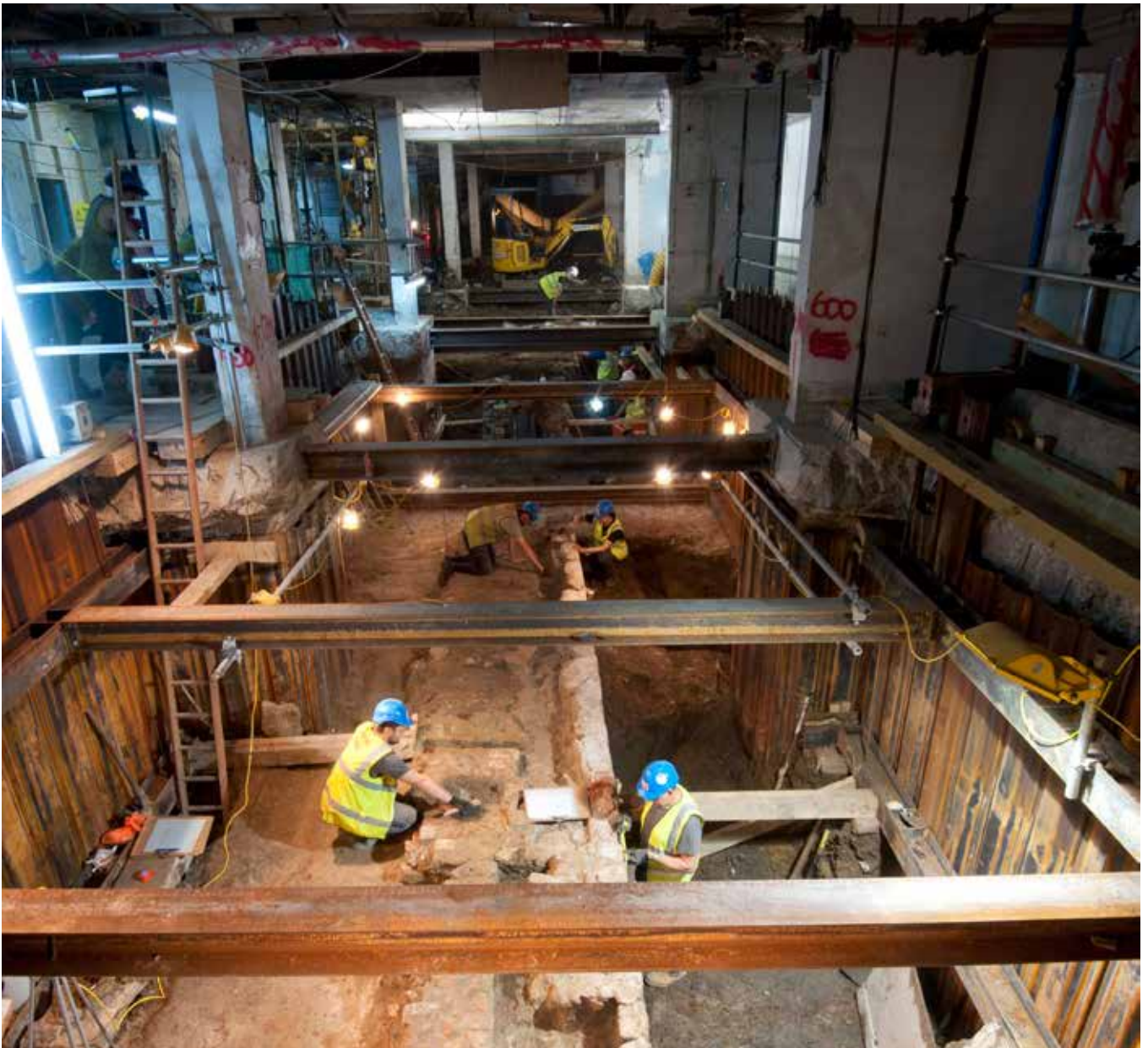




Historic England

Greater London

Archaeological Priority Area Guidelines



Summary

London has an archaeological resource of national and international significance and the highest development pressure experienced anywhere in England.

Appropriate conservation of heritage assets is a core principle of the National Planning Policy Framework. Local plans need up-to-date information about the historic environment which explains its value to society – what is termed ‘significance’. Planning decisions need to be based on a clear understanding of the development’s effect on a heritage asset’s significance.

Historic England’s Greater London Archaeological Advisory Service maintains the capital’s Historic Environment Record and provides advice to 31 borough councils. Every London borough (except the City of London) has Archaeological Priority Areas (APA) defined in their local plan. They are areas defined for planning purposes where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries.

These guidelines have been produced as part of a programme to review, revise and update the Archaeological Priority Areas across Greater London. They have been developed with the support of the Mayor of London and in consultation with borough councils, archaeological practices and interest groups.

The purpose of APAs is to provide a consistent framework for documenting archaeological interest for planning purposes. The new system will provide a sound evidence base and practical tool for strategic planning. The introduction of a ‘tiered’ system distinguishes those areas which are most significant from others which although still of interest are not quite so sensitive. This will help boroughs and developers narrow down the areas within their boroughs where archaeological interests may be affected.

This guidance note has been prepared by Patrick Booth and Sandy Kidd of the Greater London Archaeological Advisory Service.

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Front cover

Excavation of 17th century river wall and stairs
at Arundel Great Court, Westminster
© Maggie Cox/ Museum of London Archaeology

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Introduction

Historic England's [Greater London Archaeological Advisory Service](#) (GLAAS) maintains the [Greater London Historic Environment Record](#) (GLHER) and provides archaeological advice to 31 borough councils. These guidelines have been produced by GLAAS as part of a long term programme to review, revise and update the Archaeological Priority Areas (APA) across Greater London. They are intended to provide a consistent strategic framework and structured information to local authorities to help them decide how to implement national and local policy but are not prescriptive; alternative approaches may be acceptable provided they are demonstrably compliant with national policies and the London Plan.

Archaeological research and discovery is a dynamic process so it is not possible to anticipate all eventualities, threats and opportunities. Archaeological Priority Areas should therefore be seen as providing a flexible framework for informed site specific decision making but not a straitjacket.

Local plans need to be based on adequate, up-to-date and relevant information about the historic environment which explains its value to society – what is termed 'significance' – and which sets out a positive strategy for its conservation and enjoyment. Archaeological Priority Areas are set out in local plans to inform the practical application of national and local planning policies for the recognition and conservation

of archaeological interest. APAs are based on evidence held in the Greater London Historic Environment Record (GLHER). This guidance aims to make APAs more consistent in terms of their selection, extent and how their accompanying descriptions are written. Crucially APAs will be placed into three different tiers depending on their archaeological significance and potential, with a fourth tier covering all land outside a defined APA. It is intended that the review will ensure APAs are closely linked to the National Planning Policy Framework and the London Plan. At a borough level they will provide a sound evidence base for local plans and development management policies. Ultimately they will be part of a more accessible, consistent, dynamic and updateable system which will reduce bureaucracy and focus resources by providing rapid guidance on which developments are or are not likely to have significant effects on heritage assets of archaeological interest.

The City of London and London Borough of Southwark each have their own in-house archaeological planning adviser and operate comparable but not identical systems. The APAs of several GLAAS boroughs have also been reviewed and updated in recent years, again with similar but not identical approaches to the one outlined here.

Archaeological Priority Areas exist in every London borough and were initially created in the 1970s and 1980s either by the boroughs or local museums. They were created at a borough level rather than a wider regional level so there was no coherent strategy or set of guidelines leading to differences in how they were drawn up and how

their accompanying descriptions were written. In some boroughs there are no descriptions for APAs while in others the length of description can vary from a sentence to a paragraph. The level of APA coverage across boroughs varied greatly from 1 per cent in Brent to over 70 per cent in Newham.

The maintenance of APA information across London has often been neglected and revisions have been sporadic. This has led to situations where some boroughs are unclear exactly where the boundaries of their APAs are. In some cases there are differences between the information held by the local authorities and the GLHER. Improving consistency of APA selection and definition will assist local authorities to produce sound evidence-based plans which comply with the duty to co-operate.

The term by which APAs are known also varies from borough to borough. Archaeological Priority Area is the term most commonly used but other names for these areas include:

- Archaeological Interest Areas
- Archaeological Priority Zones
- Area of Archaeological Importance
- Area of Archaeological Interest
- Areas of Archaeological Priority
- Areas of Archaeological Significance
- Areas of High Archaeological Potential
- Areas of Special Archaeological Priority
- Areas of Special Archaeological Significance
- Sites of Archaeological Importance

Archaeological Priority Area is the preferred generic term and the term that will be used throughout these guidelines to describe defined areas where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries.

1 Definition

An Archaeological Priority Area is a defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries.

In the context of the NPPF, archaeological interest means evidence of past human activity worthy of expert investigation. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places and of the people and cultures that made them. However, heritage assets of archaeological interest can also hold other forms of heritage significance – artistic, architectural or historic interest. For many types of above ground heritage asset (for example historic buildings, landscapes and industrial heritage) these other interests may be more obvious or important. Sometimes heritage interests are intertwined – as is often the case with archaeological and historical interest. Whilst the APA system does not seek to duplicate protection given by other heritage designations, such as listed buildings or conservation areas, it does aim to overlap and integrate with such approaches. Understanding archaeological significance can enhance appreciation of historical, artistic or architectural interest and vice versa.

APAs highlight where important archaeological interest might be located based on the history of the area and previous archaeological investigations. They help local planning authorities to manage archaeological remains that might be affected by development by providing an evidence base for Local Plans. This evidence base identifies areas of known heritage assets of historic and archaeological interest and wider zones where there is a likelihood that currently unidentified heritage assets will be discovered in the future. APAs act as a trigger for consultation with the borough's archaeological adviser and are justified by a description of significance which will inform development management advice and decision making. The appraisal can also indicate how archaeology might contribute towards a positive strategy for conserving and enjoying the local historic environment, for example through recognising local distinctiveness or securing social or cultural benefits.

However, archaeological research and discovery is a dynamic process so it is not possible to anticipate all eventualities, threats and opportunities.

2 Planning Context

The National Planning Policy Framework (NPPF) requires local planning policy to be predicated on a presumption in favour of sustainable development. Policies in Local Plans are expected to enable development which is sustainable to be approved without delay and to include clear policies on how the presumption is applied locally. One of the NPPF's twelve core planning principles is that heritage assets should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations.

To ensure a sound local plan, planning authorities are expected to have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future (NPPF 169) and set out a positive policy for its conservation and enjoyment (NPPF 126).

National advice on how to apply these policies can be found in [The Historic Environment in Local Plans: Historic Environment Good Practice Advice in Planning Note 1](#). Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments are subject to the policies for designated heritage assets (NPPF 139).

Policy 7.8 of the London Plan (Heritage Assets and Archaeology) recognises the need to identify important areas of the city's historic environment. Any developments in the vicinity of important archaeological remains should make provision for the protection of those archaeological resources. It further states that boroughs should, in their local planning documents, seek to maintain and enhance the contribution of buried heritage to

London's environmental quality, cultural identity and economy. In relation to Local Plans, part G of London Plan Policy 7.8 says that:

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

The London Plan's Housing Supplementary Planning Guidance makes specific reference to this review of Archaeological Priority Areas (paragraph 1.3.62) and how it will help boroughs and developers narrow down the areas which may be affected.

Borough Local Plans often make a point of emphasising how the historic environment can benefit the community and how historic remains should be valued and recognise that they are a finite resource. As such, any development proposals likely to affect an important archaeological asset should include sufficient information to adequately understand and minimise or mitigate their impact.

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

3 Priority Area Tiers

Previously all parts of a borough were either inside or outside an APA. Under the new system all parts of a borough will be within an area that falls into one of four different tiers of archaeological significance and potential. The tiers vary depending on the archaeological significance and potential of that particular area. Archaeological Priority Areas will be categorised into one of Tiers 1-3 while all other areas within a borough will be regarded as being in Tier 4. They indicate when there is a need to understand the potential impact of the proposed development on the heritage asset's significance (NPPF 128). The type of planning application and the tier level it is located in indicate the likelihood that archaeology will be a consideration in reaching a planning decision (see section 5).

The four tiers are as follows:

Tier 1

This is a defined area which is known, or strongly suspected, to contain a heritage asset of national significance (a scheduled monument or equivalent); or is otherwise of very high archaeological sensitivity. Thus Tier 1 covers heritage assets to which policies for designated heritage assets would apply (NPPF 132 & 139) and a few other sites which are particularly sensitive to small-scale disturbance. They will be clearly focused on a specific known heritage asset and will normally be relatively small, although the historic urban core of London and Westminster is an exception. Scheduled monuments would normally be included within a Tier 1 APA.

Tier 2

Used for a local area within which the GLHER holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest. Planning decisions are expected to make a balanced judgement for non-designated assets considered of less than national importance considering the scale of any harm and the significance of the asset (NPPF 135). Tier 2 APA will typically cover a larger area than Tier 1 and may encompass a group of heritage assets.

Policies for designated heritage assets would not necessarily apply to every development in a Tier 1 APA as that will depend upon the nature of the proposals and results of site-specific assessment and evaluation.

Tier 1 APAs around scheduled monuments will often extend beyond the schedule boundary to reflect the full extent of the asset, including the potential for associated remains. It will not usually be practicable for an APA to define the totality of a scheduled monument's setting instead the APA will attempt to reflect areas close to the monument that would be especially sensitive. A few scheduled monuments which have been designated for their historical or other non-archaeological interest will not merit the definition of a Tier 1 APA.

Tier 3

This is a landscape scale zone within which the GLHER holds evidence indicating the potential for heritage assets of archaeological interest.

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

Tier 4

Tier 4 (outside APA) is any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area. However, Tier 4 areas are not necessarily devoid of archaeological interest and may retain some potential unless they can be shown to have been heavily disturbed in modern times. Such potential is most likely to be identified on greenfield sites, in relation to large scale development or in association with listed buildings or other designated heritage assets.

It is important to understand that the new system is intended to be dynamic and responsive to new information which either increases or decreases the significance of an area.

New information may lead to areas moving between the four tiers set out above. For example, a positive archaeological evaluation could result in a Tier 2 area (or part of it) being upgraded to Tier 1 if the remains found were judged to be of national importance.

4 Consultation Guidelines

The type of planning application and the tier level it is located in indicate the likelihood that archaeology will be a consideration in reaching a planning decision. In general the likelihood of a development causing significant harm to a heritage asset of archaeological interest is related to the scale of the development and the sensitivity of its location. The tiers from 1 to 4 indicate progressively higher to lower sensitivity. The sensitivity of an APA is closely allied to significance and potential but also takes account of assets' vulnerability and fragility and depends upon the nature of the impact for example 'prehistoric timber structures which survive within the former wetlands buried beneath modern made ground would be sensitive to deep disturbance or de-watering but unaffected by surface works.'

Consultation guidelines are set out in the GLAAS Charter, and will be reviewed and updated when necessary. The consultation guidelines link the sensitivity tiers to specific thresholds for triggering archaeological advice and assessment. It is expected that as a minimum all major applications within Archaeological Priority Areas (Tiers 1-3) would trigger an archaeological desk-based assessment, and if necessary a field evaluation, to accompany a planning application.

In the more sensitive Tier 1 and 2 areas this procedure would also apply to some smaller-scale developments. Outside Archaeological Priority Areas (that is in tier 4) most planning applications will not need an archaeological assessment but a few will. These would typically include large major developments, such as those subject to Environmental Impact Assessment, and schemes involving demolition or substantial works to historic buildings which have an archaeological interest (above and/or below ground).

Pre-application consultation with the local authority's archaeological adviser is strongly encouraged to ensure planning applications are supported by appropriate information.

GLAAS will use the APA tiers to develop an archaeological risk model for rapid initial screening of development proposals.

5 Revision and Creation

Revision of Archaeological Priority Areas is being carried out by GLAAS in collaboration with the individual London boroughs. Archaeological Priority Areas already exist in every London borough but the time since they were last revised and the quality of their associated descriptions varies greatly.

The order in which boroughs are to be reviewed will be based on the quality of their current APA information, and the level of development pressure. The programme will be reviewed annually. Due to previous limited capacity within GLAAS some planning authorities have chosen to use consultants to complete APA reviews to their own timetable in collaboration with GLAAS. In future we will only support such work where it complies with these guidelines. We also offer an enhanced service funded by local planning authorities to complete reviews ahead of schedule.

The process of revising a borough's APA information begins with a rapid scoping exercise to identify where new APAs are needed, or existing APAs changed or deleted. Analysis involves considering for each APA its history and topography, its known archaeology and archaeological potential which will be researched and tested against the selection criteria (see section 7). If necessary its boundaries will be realigned. An existing APA might also be broken down into smaller APAs if it is felt that this better reflects areas of distinctly different significance, particularly if parts of it need to be in different tier groups. Existing APAs might also be merged and in some cases, if their existence is no longer thought to be justified, they will be deleted. In addition to the revision of existing APAs, new APAs may also be created as a result of new information from archaeological interventions that have taken place since a borough's APAs were created or last revised. New APAs may be created

and others deleted as a consequence of the consistent application of the new APA selection criteria across London. All the revised or new APAs will be placed into tier categories.

The primary source for researching APAs is the GLHER and key sources cited within it. The GLHER includes modern and some historic maps, including geological mapping. Selected external sources may also be consulted such as relevant books and reports, local history libraries, historic maps and relevant websites. However, it is not possible to undertake a complete and definitive study of each APA in the time available and a balance must be struck. Key sources used to define the significance of the APA will be cited but an exhaustive rendition of sources is not expected.

Once the draft revision is complete the borough will be given the new information in the form of revised APA maps and descriptions and arrangements for consultation agreed. Following consultation the draft revision will be updated to create a proposed revision which will be recommended to the borough for formal adoption. In the unlikely event that agreement cannot be reached on formal adoption GLAAS reserves the right to base its future technical advice on a soundly evidenced proposed revision document.

GLAAS will publish its APA review programme on-line. GLAAS will encourage focussed public engagement within the constraints of resources, timescales and confidentiality but arrangements

for public consultation will be agreed with the council. With their agreement, consultation could be informal (for example contact with local groups or specialists) and/or formal (for example as part of a local plan adoption process).

Completed APA appraisals, including maps, descriptions and associated GIS data will be made available through the GLHER and provided to the relevant borough council. We will provide APA information on the GLAAS website and explore how GIS data might be made more easily accessible.

6 Selection Criteria

A combination of archaeological, architectural, historical and natural topographic information will justify the creation of an APA, its extent and the tier it should be placed into:

- The recorded existence of heritage assets or finds on the GLHER, even if these are now destroyed they may indicate potential in the surrounding area. Designated heritage assets indicate that significance has already been recognised but the archaeological dimension may not have been considered.
- Historical settlement and land use (for example field, marsh, wood or parkland) as indicated by aerial photographs, maps, documents and ground investigations. This is most useful for medieval and post-medieval periods and can also indicate where modern disturbance has occurred.
- The natural topography, geology and drainage of the area – how is this likely to have influenced past land use, created an archaeological ‘signature’ and preserved (or eroded) archaeological remains. These natural factors are particularly valuable in predicting areas of pre-medieval interest where other evidence is sparse. Permanently waterlogged areas are particularly important for their preservation of organic remains.
- Historical and communal values can create an ‘intangible heritage’ of places (for example historical associations, local traditions or spiritual beliefs) which should be considered as supporting evidence where clearly associated with physical remains and if well-established and recognised.

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

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

Tier 1

Positive Indicators:

- World Heritage Site of archaeological interest
- Scheduled monument and adjacent archaeological remains directly associated with it or the landscape/townscape forming its immediate setting
- Undesignated asset judged equivalent to a scheduled monument by reference to national Designation Selection criteria and with reference to the Monuments Protection Programme London Review 2003
- Urban or proto-urban areas of national interest for example Roman and medieval London, Saxon Lundenwic
- Exceptionally, other undesignated assets of special interest requiring archaeological consideration of small scale change
- History of positive archaeological interventions in the area
- Registered Historic Park and Garden or Battlefield with significant archaeological interest
- Area of historic settlement (but see note below)
- A specific location of historic industry or infrastructure with significant archaeological interest
- A burial ground of 19th century or earlier origin
- Conservation area or listed buildings or historic landscape (for example ancient woodland) with archaeological interest
- Area with demonstrated potential for deeply buried, stratified or waterlogged remains (including palaeo-environmental)
- Area of undeveloped land or a distinctive topographical feature closely associated with a known heritage asset, finds or other clear evidence of archaeological interest

Contrary Indicators:

- Does not meet designation criteria
- Not an area GLAAS would want to receive small scale consultations for because its significance is not vulnerable to such changes

Tier 2

Positive Indicators:

- Heritage asset of archaeological or historic interest recorded on the GLHER; or significant concentrations of finds
- Corridor of land typically about 200m wide centred along a Roman road
- Areas of extensive modern disturbance (for example quarrying or multiple phases of redevelopment)
- The area has been effectively sterilised by previous large scale archaeological interventions in advance of redevelopment
- A history of repeated or extensive negative interventions
- Sparse archaeological records
- A lack of significant features on historic maps

Tier 3

Positive Indicators:

- A topographical zone with high potential for preservation of organic remains (wetland/riverine)
- An extensive topographical/geological area with evidence for surviving archaeological landscapes
- An extensive area of historic industry or infrastructure
- An extensive area of undeveloped land associated with a major site and/or research priority
- Good survival of distinctive historic rural landscape; typically in the form of ancient woodland, commons, meadows, parkland or historic field patterns

Contrary Indicators:

- An extensive area of modern disturbance/redevelopment
- A lack of archaeological records
- A lack of significant features on historic maps
- A lack of focus or cohesion in relation to significance
- A history of repeated or extensive negative interventions
- Presence of discrete heritage assets better managed at Tier 1 or 2 (although these may be nested within a wider Tier 3 area)

Explanatory Notes

There are a number of special cases which warrant further consideration of the appropriate consistent treatment:

Palaeolithic and Mesolithic: Sites of these periods very rarely have recognisable structures. Instead, occupation is usually marked by scatters of worked flint and, in favourable preservation environments, materials such as bone and wood and environmental evidence. Due to sea-level change, Palaeolithic and Mesolithic sites may be present many meters below modern sea level. The London region is internationally significant for its prolific Lower Palaeolithic remains which are usually found within geological strata of the Quaternary period - typically deposits associated with the Thames terrace sequence. A key nationwide survey is The English Rivers Palaeolithic Project (TERPS) and the related publication *The Lower Palaeolithic Occupation of Britain* (Wymer, 1999). There is a significant overlap with Quaternary geology and palaeo-environmental studies, for which see [London's Foundations: Protecting the Geodiversity of the Capital](#) (Greater London Authority Supplementary Planning Guidance, March 2012).

Known Palaeolithic sites where there is clear evidence that occupation deposits survive in-situ or finds of exceptional significance may be present should be allocated Tier 1; as should in-situ Mesolithic sites with good preservation (for example associated animal bone) indicating national importance. Other significant sites on concentrations of finds should be allocated to Tier 2. Geological deposits believed likely to contain significant remains (for example due to scatters of isolated finds, faunal remains or environmental deposits) should be considered for Tier 3. The depth and nature of deposits should be explained in the APA description. For less vulnerable (deeply buried) and extensive areas the caseload implications of wide coverage of built up areas should be born in mind and a practical balance struck.

Historic settlements: These are numerous and require care in selection for APA status, especially when considering formerly rural settlements swallowed up by modern urban development. The boundary of historic London will be defined as the built up area in the mid-18th century (as shown on John Rocque's map of London, Westminster and Southwark, 1745) plus any closely associated non-built land uses of archaeological interest. Elsewhere areas of probable medieval settlement (including standing buildings with medieval fabric) should be selected unless subject to other strongly contrary indicators. Post-medieval farms and rural settlements which have been swallowed up by modern urban expansion should be excluded unless there is a clearly articulated justification for their significance, for example the archaeological interest related to a conservation area or post-medieval research agenda. Demolished post-medieval country houses should be included if likely to be well preserved below ground. However, it will not be practical to include all standing domestic buildings of possible archaeological interest within APAs but where they are included their interest should be noted.

Historic landscapes: Areas such as ancient woodlands, commons and parkland are typically both of archaeological interest themselves and act as 'islands of preservation' for earlier remains - see for example *Woodland Archaeology in London* (J Morris for English Heritage and the Forestry Commission).

Post-medieval/modern industry, infrastructure, transport and military sites: These can give rise to extensive, substantial physical remains where archaeological, architectural and historical interests typically overlap and inter-disciplinary collaboration is needed to properly understand significance and manage change. Building upon documentary research, archaeological investigation can refine understanding of, or better reveal, the significance of these types of site. Industrial heritage is of particular significance because of London's rapid growth to become the most populous city in the world in the mid to late 19th century, its status as the capital city of a global empire and the world's first

modern industrialised nation. Pre-20th century industry and infrastructure will be included within APA where there is an archaeological dimension to their management but especially for the 19th century, care must be taken to be selective and properly justify archaeological interest - extensive areas of moderate or uncertain potential would be allocated to Tier 3.

Exemplar sites associated with the World Wars or Cold War and with significant surviving structures (above or below ground) should be included in APA if their interest is not adequately covered by other mechanisms. However, it will not be practical to include all standing industrial, transport and military buildings of possible archaeological interest within APAs but where they are included their interest should be noted.

River Thames: The Thames foreshore has demonstrated high potential for well-preserved remains of all periods and so is likely to be eligible for APA status along its entire length. London's maritime heritage is exemplified by the landscape-scale sequence of docks, ship building and maintenance yards downstream of the city. The Thames, its foreshore, historic shoreline, dock/shipyards and wrecks will be included within APA.

Historic Burial Grounds: 19th century or earlier burial grounds should be included in APAs even if still in use - they will often be situated within wider APAs so their specific sensitivity can be covered in the description. For boroughs with a number of such burial grounds group them together under a single APA description linked to several polygons. Some burial grounds will merit Tier 1 status: typically those with medieval or earlier origin or serving distinctive communities or which are designated designed landscapes.

Local Variation: Sites of local interest may be identified by local societies or community groups or during the process of APA review. There are some boroughs or topographical areas with relatively little known archaeology where almost any finds should be considered of some interest (for example prehistoric sites on London Clay). Such local variations are permissible but will need careful justification.

7 Defining Boundaries

Mapping archaeological interest and potential is not an exact science – it is an exercise in professional judgment working with a wide variety of often incomplete or circumstantial evidence. The intention is to give a good indication of areas of interest but the boundaries are often simply indicative of a gradual change in potential.

The boundaries of an APA should, wherever possible, follow features that are observable on a map. These could be roads, foot paths, property boundaries, rivers/canals, railway lines, park, common or playing field boundaries etc. Doing this prevents the boundary of an APA passing irregularly through buildings or across open land which could lead to disputes over which parts are within an APA.

Where a feature such as a road, footpath, railway line or river is used as the boundary for an APA the boundary should normally include the feature in its entirety if the feature is significant to the APA, or exclude it if not. Where two APAs adjoin one another then following the centreline of such a feature might be appropriate.

‘Holes’ should not be created within APAs for small to medium sized areas of disturbance such as basements or small/medium-sized quarry pits – such features might be mentioned in the text where relevant to decision-making for example ‘the area has high potential for medieval settlement remains except where disturbed by modern basements.’

In cases where a single relatively small but important feature is the focus of an APA it might be appropriate to draw a buffer around it to recognise its setting and/or potential for associated remains. The buffer area should not be an arbitrary distance rather it should be justified by reference to the monument’s significance and surroundings.

Sometimes the precise location or extent of a heritage asset is uncertain. An example of this might be where an APA covered the projected route of a Roman road where only the approximate route and the potential for roadside settlements or cemeteries is known. In these situations a line is drawn along the projected route of the road, and a buffer zone created either side of it.

The London wide update of APAs will be done one borough at a time so each borough’s APAs will be looked at within the context of that borough. However, it is recognised that areas of archaeological interest often cross modern borough boundaries. In these cases two separate APAs would be used to cover a single larger area which lies within two or more different boroughs. This could happen with large open areas such as historic parks or where a river or the projected line of a Roman road passes through different boroughs. An APA can only lie within one borough but it can border another APA in a separate borough and together they can form a multi-borough area.

Each APA would still need a separate description but should clearly explain how they relate to one another, especially where the justification for an APA lies principally in evidence from a neighbouring borough. For outer London boroughs the neighbouring county HER should be consulted to take into account heritage assets alongside or spanning London’s boundary. However as neighbouring authorities outside London will have different arrangements for recognising

archaeological interest it is not realistic to expect exact cross-boundary matching.

APAs belonging to different tier groups should never overlap one another since this would inevitably lead to confusion over whether GLAAS should be consulted over a particular development. There will be cases where a Tier 1 APA will be surrounded by a Tier 2 or a Tier 3 APA but in such cases a parcel of land will be classified as being Tier 1 only, not as Tier 1 and Tier 2 or 3. The top tiered APA will effectively be cut out of the less sensitively tiered APA. Overlapping of APAs belonging to the same tier group should

be avoided as far as possible. However, in the case of an APA that might follow the route of a linear feature such as a Roman road this may not always be possible. Two APAs of the same tier can occupy the same area because their sensitivity tier is the same – in such cases significance would be drawn from both descriptions.

Figure 1 shows how areas are to be depicted using a consistent colour scheme for outline and hatched fill:
Tier 1 (black), Tier 2 (red) and Tier 3 (blue).

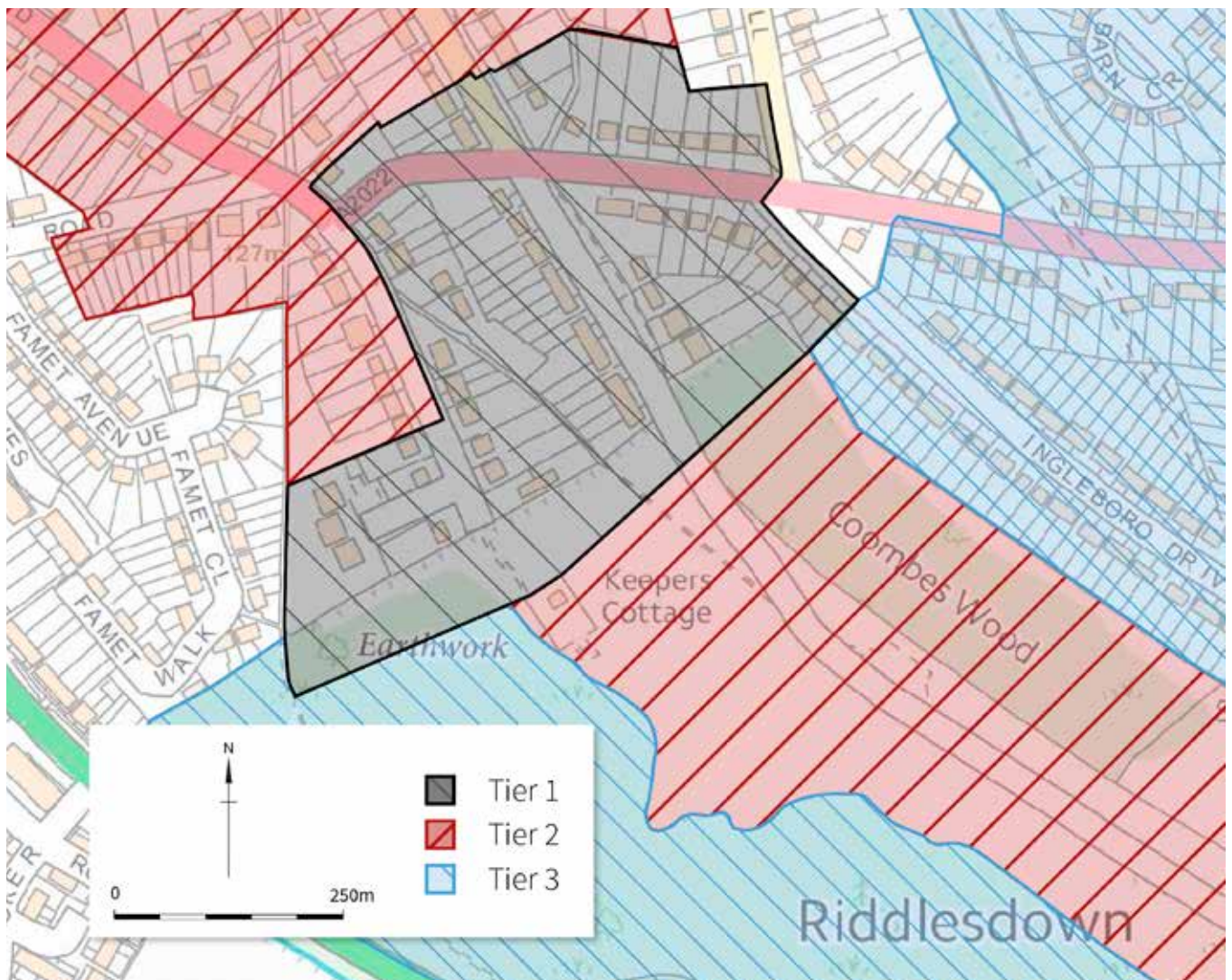


Figure 1
Archaeological Priority Area map
for Riddledown Road, Croydon.

8 Descriptions

Each borough should have a short overview describing the landscape history of the area indicating any major historical or geographical factors relevant to the patterning of archaeological interest (for example river gravels contrasting with claylands; former wetlands; historic dispersed or nucleated settlement pattern; urban expansion etc).

Reference can be made to broad synthetic works such as the London Research Framework, Natural Character Areas, Roberts and Wrathmell's Atlas of Medieval Settlement etc. Carefully written, this section should help situate the borough within its national and regional context and provide an explanation for the selection of APAs.

Each APA needs to have an accompanying description which will consist of a summary and definition, a description of its character, a statement of its significance and any key references.

Summary and definition

This section provides a brief overview of the key features of the APA, the justification for its selection and how its boundaries were defined. It also gives an explanation as to why it has been placed in a particular tier.

Description

The description section will go into more detail about the history and archaeology of the APA to describe its overall character. Whilst a large amount could be written about most APAs but one or two A4 pages should normally be sufficient to cover the significant aspects. This section will flesh out the basic summary and definition and should lead on to the statement of significance.

Descriptions should identify all periods of remains relevant to the APA's significance, their character and diversity (settlement, industrial etc) and historical context (where relevant).

It should make clear how archaeological interest is evidenced and should not restrict itself to conventional 'archaeological remains' – for example, historic buildings, townscape, landscape and planted or managed vegetation may hold archaeological and related historical interests. 'Potential' should also be explained with justification. Evidence relevant to the survival of remains should be mentioned as should (briefly) modern land use – for example, if an area is heavily industrialised then some justification will be needed for believing that prehistoric remains might nonetheless survive.

APA descriptions will be read by a range of people such as planners, archaeologists, academics and members of the public. They therefore have to be accessible to all so terminology that is too technical or descriptions that go into too much depth should be avoided or if unavoidable, explained. Specialist acronyms such as 'DMV' should be avoided. Dates should be spelt out in full for example 'late Bronze Age' not LBA.

Statement of significance

The significance section is important because conserving significance of heritage assets is a core planning principle. The statement will summarise the heritage significance of the APA with particular reference to archaeological interest and related historical interest.

Notably rare (regionally or nationally) or good examples of heritage assets should also be referred to. Where assets hold (or have clear potential to hold) national or international significance that should be explained and justified. The potential for new discoveries should be explained where this forms a key part of the area's significance – this will be especially important for Tier 3 APAs.

Drawing upon London's research framework, or where appropriate other relevant expressions of research interest, the statement should refer to broad research themes which the area might contribute to but specific project related objectives are best avoided.

The fragility/vulnerability of the interests should be covered – so visible earthworks will be flagged as vulnerable to surface works whilst deeply buried features would not be affected. Opportunities for contributing to wider planning objectives such as sense of place, community engagement or natural environment conservation should be highlighted, as should options for improved land management (for example through reversion of cultivated sites to pasture).

Key references

Where an APA description is based on a single or few key reports or publications these should be referenced using the same format as national designations. However, it is not necessary or appropriate to provide a long and exhaustive bibliography as the GLHER and material cited in it will be a general source.

9 Adoption and Review

A programme for the review of APAs has been prepared with priorities based principally on maintaining data quality, and secondarily on perceived development threat. The programme will be reviewed annually.

The process of updating the APAs in every London borough could take more than a decade although it is hoped that enhanced service arrangements will enable work to progress more quickly.

Once a borough has had its APAs reviewed the new appraisal will be need to be incorporated into the local plan. How this will be done may vary but several mechanisms are suggested:

- Reference in the Local Plan and inclusion of the appraisal as supporting evidence
- Adoption of the appraisal as a supplementary planning document
- Inclusion on a local list of heritage assets

Once an APA review has been published by the borough as part of an emerging plan policy it can be given weight in decision-making (NPPF 216). It follows that an APA appraisal document can have a status as follows:

- In preparation (prior to plan publication) – not to be used in decision-making advice
- Published as part of an emerging plan – may be given weight in decision-making especially if not subject to unresolved objections
- Part of an adopted plan – given weight in decision-making

Once all boroughs have an APA appraisal, a process and cycle for APA review and updating will be put in place. At present it is envisaged that changes might be suggested either by GLAAS, the borough or third parties. Suggestions would be initially screened by GLAAS then either rejected with reasons or logged as potential future changes for the next review cycle. Reviews should occur at least every five years to ensure that the system does not get badly out of date.

It would be preferable for all the APAs within a borough to be revised together at the same time. However, it may be possible for a single area to be revised if circumstances arose where it was not appropriate to wait for the next borough wide revision. There are a number of scenarios where this might happen. For example, new information might lead to the creation of a new APA or boundary of an APA being revised or a current one being deleted. An APA might also be reviewed as part of a new Conservation Area appraisal. However, as APAs form part of the borough's development plan it would not be appropriate to revise an APA during the decision-making process on an individual planning application.

Whatever situation might lead to the revision of an APA a borough should still consult GLAAS before altering, adding or deleting an APA. Likewise GLAAS can recommend changes but the decision to adopt them rests with the borough. After consultation a new boundary and, if necessary, a new description will be created and agreed upon before any amendment to the borough's existing APA information is made.

10 Glossary

Archaeological Priority Area (APA): generic term used for a defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries.

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. (NPPF definition). There can be an archaeological interest in buildings and landscapes as well as earthworks and buried remains.

Conservation: The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. (NPPF definition).

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation. (NPPF definition).

Heritage asset: 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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing). (NPPF definition).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. (NPPF definition).

Historic environment record (HER): Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use. (NPPF definition). Historic England maintains the Historic Environment Record for Greater London.

Potential: In some places, the nature of the archaeological interest cannot be specified precisely, but it may still be possible to document reasons for anticipating the existence and importance of such evidence. Circumstantial evidence such as geology, topography, landscape history, nearby major monuments and patterns of previous discoveries can be used to predict areas with a higher likelihood that currently unidentified heritage assets of historic and archaeological interest, will be discovered in the future.

Research framework: A suite of documents which describe the current state of knowledge of a topic or geographical area (the 'resource assessment'), identifies major gaps in knowledge and key research questions (the 'agenda') and set out a strategy for addressing them. A resource assessment, agenda and strategy has been published for London archaeology.

Setting of a heritage asset: 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 definition).

Sensitivity: The likelihood of typical development impacts causing significant harm to a heritage asset of archaeological interest. Sensitivity is closely allied to significance and potential but also takes account of the asset's vulnerability and fragility.

Significance: The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting (NPPF definition).

11 Appendix

An Archaeological Priority Area Appraisal should contain:

- Document control table
- Contents list
- Introduction
- General explanation of archaeological priority areas and tiers
- Timeline based on the Greater London Historic Environment Record periods
- General overview of the borough's archaeological and historical character by period
- List of the borough's APAs and their tier with overall location maps.
- Description and statement of significance for each APA with map
- Glossary

12 Where to Get Advice

For further information on London's Archaeological Priority Areas, the work of the Greater London Archaeological Advisory Service and contacts, see <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/>

12.1 Contact Historic England

East Midlands

2nd Floor, Windsor House
Cliftonville
Northampton NN1 5BE
Tel: 01604 735460
Email: eastmidlands@HistoricEngland.org.uk

East of England

Brooklands
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Cambridge CB2 8BU
Tel: 01223 582749
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Fort Cumberland Road
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Tel: 023 9285 6704
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