

ARCHAEOLOGICAL DESK BASED ASSESSMENT

Avonmouth House, 6 Avonmouth Street, Elephant & Castle SE1 6NX

JAC27293
Avonmouth House, 6
Avonmouth Street, Elephant
& Castle SE1 6NX
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EXECUTIVE SUMMARY

- The site of Avonmouth House, 6 Avonmouth Street, Elephant & Castle SE1 6NX has been assessed for its below ground archaeological potential in advance of proposed development.
- No designated archaeological assets will be impacted by the proposed development of the site.
- The study site is located within an Archaeological Priority Zone for 'North Southwark and Roman Roads' as defined by the London Borough of Southwark. This is an extremely broad APZ covering a very wide area of the Borough and intended to capture various areas of archaeological interest, much of which does not apply to the study site itself. Whilst it is categorised as Tier 1 by the GLHER, this rating does not indicate the presence of Tier 1 applicable archaeological remains across the full APZ.
- Prior to an assessment of modern ground disturbance impacts, this assessment identified a moderate archaeological potential at the site for the Roman and Medieval periods. A 17th century Civil War fort was located to the south west although is not anticipated to have extended into the study site. Evidence for Modern building foundations is to be anticipated at the site. A low potential was identified for all other past periods of human activity. It was concluded that, if present, any remains would most likely be of up to a local significance only.
- However, Modern development impacts are likely to have been severe at the site, due to extensive industrial development in the mid-19th century, bomb damage during World War Two, and subsequent phases of clearance, demolition, and redevelopment to the present day. These historic 19th and 20th century industrial works have extended outside the site to the immediate west where a previous programme of archaeological monitoring identified no evidence for archaeological remains, indicative of widespread truncation and ground disturbance. These same industrial works are likely to have had a similarly severe impact within the study site and thereby reduced the site's archaeological potential.
- Overall, given the likely extent of past ground disturbance, it is considered that the study site retains only a limited archaeological potential for remains of up to a local significance only. Whilst the site's location within a locally defined Archaeological Priority Zone is acknowledged, it is considered unlikely that the proposed development would have either a significant or widespread archaeological impact.
- In this particular instance, this assessment is considered sufficient to satisfy the pre-planning requirements of Policy 3.19 of the Saved Southwark Local Plan (2007, saved in 2013) and no further archaeological works are recommended to support a planning application. The Southwark Borough Archaeologist may take a precautionary approach and request further archaeological work if it cannot be suitably demonstrated that extensive past impacts have reduced the archaeological potential of the site. This may be further informed by site geotechnical information or archaeological monitoring of such work.
- Given the conclusions of this assessment and that high significance remains which might preclude development are not anticipated at the site, any such further work could reasonably be secured by attaching an appropriately worded planning condition to the granting of planning consent.

Contents

EXECUTIVE SUMMARY	I
1 INTRODUCTION AND SCOPE OF STUDY	4
2 PLANNING BACKGROUND AND DEVELOPMENT PLAN FRAMEWORK.....	5
National Planning Policy	5
Local Planning Policy	6
Relevant National and Local Designations	10
3 GEOLOGY AND TOPOGRAPHY	12
Geology	12
Topography	12
4 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND WITH ASSESSMENT OF SIGNIFICANCE	13
Timescales used in this report.....	13
Introduction	13
Previous Archaeological Work	14
Early Prehistoric – Palaeolithic & Mesolithic	14
Later Prehistoric – Neolithic, Bronze Age & Iron Age	14
Roman	14
Saxon/Early Medieval & Medieval.....	15
Post Medieval & Modern (including map regression exercise)	16
Negative Evidence.....	17
Assessment of Significance	17
5 SITE CONDITIONS, THE PROPOSED DEVELOPMENT & REVIEW OF POTENTIAL DEVELOPMENT IMPACTS ON ARCHAEOLOGICAL ASSETS	19
Site Conditions	19
Proposed Development	19
Review of Potential Development Impacts on Archaeological Assets	19
6 SUMMARY AND CONCLUSIONS	21

Figures

Figure 1: Site Location

Figure 2: HER Plot (Data from Greater London HER)

Figure 3: 1642-3 Plan of London Civil War Defences drawn in 1738 by Vertue

Figure 4: 1682 Morgan Plan of London

Figure 5: 1746 Rocque Map of London

Figure 6: 1790 (circa) Bonniselle Plan of London

Figure 7: 1795 Horwood Plan of London

Figure 8: 1828 Cruchley Plan of London

Figure 9: 1850 St Mary Newington Parish Tithe Map

Figure 10: 1872 Ordnance Survey (1:1056)

Figure 11: 1889 Goad Fire Insurance Plan

Figure 12: 1896 Ordnance Survey (1:1056)

Figure 13: 1916 Ordnance Survey (1:2500)

Figure 14: 1939-45 LCC Bomb Damage Map

Figure 15: 1950 Ordnance Survey (1:1250)

Figure 16: 1983-87 Ordnance Survey (1:1250)

Figure 17: 2020 Google Earth Image

Figure 18: Indicative Development - Basement Plan

Figure 19: Indicative Development - Ground Floor Plan

Figure 20: Second Basement Level

1 INTRODUCTION AND SCOPE OF STUDY

- 1.1 This below ground archaeological desk-based assessment has been researched by Alex Slater, prepared by James Archer, and approved by Matthew Smith of RPS Heritage on behalf of Tribe Avonmouth House Ltd.
- 1.2 The subject of this assessment, also known as the study site, is Avonmouth House, at 6 Avonmouth Street, Elephant & Castle SE1 6NX. The site is approximately 0.12ha in extent and is centred at TQ 32153 79354 (Fig. 1) within the administrative area of the London Borough of Southwark.
- 1.3 Policy 3.19 of the Saved Southwark Local Plan (2007, saved in 2013) requires that any development within an Archaeological Priority Zone in the Borough must be accompanied by an archaeological assessment and evaluation of the site.
- 1.4 Accordingly, Tribe Avonmouth House Ltd has commissioned RPS Heritage to establish the archaeological potential of the site and to provide guidance on ways to address any archaeological constraints identified.
- 1.5 In accordance with relevant policy and guidance on archaeology and planning, and in accordance with the 'Standard and Guidance for Historic Environment Desk-Based Assessments' (Chartered Institute for Archaeologists October 2020), this assessment draws together the available archaeological, topographic and land-use information in order to clarify the archaeological potential of the site.
- 1.6 This desk-based assessment comprises an examination of evidence on the Greater London Historic Environment Record (GLHER), and other sources, and includes the results of a comprehensive map regression exercise.
- 1.7 This assessment thus enables relevant parties to assess the archaeological potential of various parts of the site and to consider the need for design, civil engineering, and archaeological solutions to the archaeological potential identified.

2 PLANNING BACKGROUND AND DEVELOPMENT PLAN FRAMEWORK

- 2.1 National legislation regarding archaeology, including scheduled monuments, is contained in the Ancient Monuments and Archaeological Areas Act 1979, amended by the National Heritage Act 1983 and 2002, and updated in April 2014.
- 2.2 In March 2012, the government published the National Planning Policy Framework (NPPF), which was most recently revised in July 2021. The NPPF is supported by the National Planning Practice Guidance (NPPG), which was published online 6th March 2014 and has since been periodically updated.
- 2.3 The NPPF and NPPG are additionally supported by three Good Practice Advice (GPA) documents published by Historic England: GPA 1: The Historic Environment in Local Plans; GPA 2: Managing Significance in Decision-Taking in the Historic Environment (both published March 2015). The second edition of GPA3: The Setting of Heritage Assets was published in December 2017.

National Planning Policy

- 2.4 Section 16 of the NPPF, entitled 'Conserving and Enhancing the Historic Environment' provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:
- Delivery of sustainable development;
 - Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
 - Conservation of England's heritage assets in a manner appropriate to their significance; and
 - Recognition of the contribution that heritage makes towards our knowledge and understanding of the past.
- 2.5 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 194 states that planning decisions should be based on the significance of the heritage asset and that the level of detail supplied by an applicant should be proportionate to the importance of the asset and should be *no more than sufficient* to review the potential impact of the proposal upon the significance of that asset.
- 2.6 *Heritage Assets* are defined in Annex 2 of the NPPF as: 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
- 2.7 Annex 2 also defines *Archaeological Interest* as a heritage asset which holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- 2.8 A *Nationally Important Designated Heritage Asset* comprises 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.
- 2.9 *Significance* is defined as: The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

- 2.10 *Setting of a heritage asset* is defined as: 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.
- 2.11 In short, government policy provides a framework which:
- Protects nationally important designated Heritage Assets;
 - Protects the settings of such designations;
 - In appropriate circumstances seeks adequate information (from desk based assessment and field evaluation where necessary) to enable informed decisions;
 - Provides for the excavation and investigation of sites not significant enough to merit *in-situ* preservation.
- 2.12 The NPPG reiterates that the conservation of heritage assets in a manner appropriate to their significance is a core planning principle, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in active use that is consistent with their conservation. Importantly, the guidance states that if complete, or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset's significance and make the interpretation publicly available. Key elements of the guidance relate to assessing harm. An important consideration should be whether the proposed works adversely affect a key element of the heritage asset's special architectural or historic interest. Additionally, it is the degree of harm, rather than the scale of development, that is to be assessed. The level of 'substantial harm' is considered to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF. Importantly, harm may arise from works to the asset or from development within its setting. Setting is defined as the surroundings in which an asset is experienced and may be more extensive than the curtilage. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 2.13 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

Local Planning Policy

London Plan

- 2.14 The proposed development has been assessed against relevant policies in the London Plan (March 2021). Chapter 7 'Heritage and Culture' contains relevant policies. Of particular relevance to archaeological sites within Greater London is policy HC1 as follows:

Policy HC1 Heritage conservation and growth

- A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.**

- B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:**
- 1. setting out a clear vision that recognises and embeds the role of heritage in place-making**
 - 2. utilising the heritage significance of a site or area in the planning and design process**
 - 3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place**
 - 4. delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.**
- C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.**
- D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.**
- E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.**

London Borough of Southwark

- 2.15 The London Borough of Southwark Core Strategy was adopted in April 2011 and contains the following relevant archaeological policy:

STRATEGIC POLICY 12 – DESIGN AND CONSERVATION

DEVELOPMENT WILL ACHIEVE THE HIGHEST POSSIBLE STANDARDS OF DESIGN FOR BUILDINGS AND PUBLIC SPACES TO HELP CREATE ATTRACTIVE AND DISTINCTIVE PLACES WHICH ARE SAFE, EASY TO GET AROUND AND A PLEASURE TO BE IN. WE WILL DO THIS BY:

- 1. EXPECTING DEVELOPMENT TO CONSERVE OR ENHANCE THE SIGNIFICANCE OF SOUTHWARK'S HERITAGE ASSETS, THEIR SETTINGS AND WIDER HISTORIC ENVIRONMENT, INCLUDING CONSERVATION AREAS, ARCHAEOLOGICAL PRIORITY ZONES AND SITES, LISTED AND LOCALLY LISTED BUILDINGS, REGISTERED PARKS AND GARDENS, WORLD HERITAGE SITES AND SCHEDULED MONUMENTS.**
- 2. CAREFULLY MANAGING THE DESIGN OF DEVELOPMENT IN THE THAMES POLICY AREA SO THAT IT IS SENSITIVE TO THE MANY SPECIAL QUALITIES OF THE RIVER.**

3. MAKING SURE THAT THE HEIGHT AND DESIGN OF DEVELOPMENT CONSERVES AND ENHANCES STRATEGIC VIEWS AND IS APPROPRIATE TO ITS CONTEXT, THE HISTORIC ENVIRONMENT AND IMPORTANT LOCAL VIEWS

4. REQUIRING TALL BUILDINGS TO HAVE AN EXEMPLARY STANDARD OF DESIGN AND MAKE A POSITIVE CONTRIBUTION TO REGENERATING AREAS AND CREATING UNIQUE PLACES. LOCATIONS WHERE TALL BUILDINGS COULD GO ARE IN LONDON BRIDGE, THE NORTHERN END OF BLACKFRIARS ROAD, ELEPHANT AND CASTLE AND ACTION AREA CORES. THESE ARE SHOWN ON THE KEY DIAGRAM.

5. CONTINUING TO USE THE SOUTHWARK DESIGN REVIEW PANEL TO ASSESS THE DESIGN QUALITY OF DEVELOPMENT PROPOSALS.

6. REQUIRING DESIGN AND ACCESS STATEMENTS WITH APPLICATIONS AND ENCOURAGING BUILDING FOR LIFE ASSESSMENTS AND HERITAGE IMPACT ASSESSMENTS.

- 2.16 The London Borough of Southwark Unitary Development Plan (UPD) was adopted in July 2007. The Plan contains the following policies which have been saved until the adoption of the Local Development Framework:

POLICY 3.19 – ARCHAEOLOGY

PLANNING APPLICATIONS AFFECTING SITES WITHIN ARCHAEOLOGICAL PRIORITY ZONES, AS IDENTIFIED IN APPENDIX 7, SHALL BE ACCOMPANIED BY AN ARCHAEOLOGICAL ASSESSMENT AND EVALUATION OF THE SITE, INCLUDING THE IMPACT OF THE PROPOSED DEVELOPMENT. THERE IS A PRESUMPTION IN FAVOUR OF PRESERVATION IN SITU, TO PROTECT AND SAFEGUARD ARCHAEOLOGICAL REMAINS OF NATIONAL IMPORTANCE, INCLUDING SCHEDULED MONUMENTS AND THEIR SETTINGS. THE IN SITU PRESERVATION OF ARCHAEOLOGICAL REMAINS OF LOCAL IMPORTANCE WILL ALSO BE SOUGHT, UNLESS THE IMPORTANCE OF THE DEVELOPMENT OUTWEIGHS THE LOCAL VALUE OF THE REMAINS. IF PLANNING PERMISSION IS GRANTED TO DEVELOP ANY SITE WHERE THERE ARE ARCHAEOLOGICAL REMAINS OR THERE IS GOOD REASON TO BELIEVE THAT SUCH REMAINS EXIST, CONDITIONS WILL BE ATTACHED TO SECURE THE EXCAVATION AND RECORDING OR PRESERVATION IN WHOLE OR IN PART, IF JUSTIFIED, BEFORE DEVELOPMENT BEGINS.

- 2.17 The emerging New Southwark Plan (NSP) will be a new borough-wide planning and regeneration strategy up to 2033. Once finalised and adopted it will replace the saved Southwark Plan policies and the 2011 Core Strategy. The Proposed Submission Version of the New Southwark Plan (August 2020) is currently undergoing public examination. The most recent version contains the following draft policy relevant to archaeology at the site:

P20: Conservation of the historic environment and natural heritage

Development must:

1. Conserve and enhance the significance of the following heritage assets and their settings:

- i. Scheduled monuments; and**
- ii. Sites of archaeological interest; and**
- iii. Protected London squares; and**
- iv. Registered parks and gardens; and**
- v. Trees within the curtilage of a listed building; and**

- vi. Trees that contribute to the historic character or appearance of conservation areas; and
 - vii. Trees that are subject to a Tree Preservation Order (TPO); and
 - viii. Ancient hedgerows; and
 - ix. Buildings and land with Article 4 (1) directions inside and outside conservation areas; and
 - x. Unlisted buildings of townscape merit; and
 - xi. Undesignated heritage assets including Second World War Stretcher Fences; and
 - xii. Foreshore and river structures; and
2. Enable the viable use of the heritage asset that is consistent with its on-going and long-term conservation; and
3. Provide robust justification for any harm to the significance of the heritage asset that results from the development.

P22: Archaeology

1. Development must conserve the archaeological resources commensurate to its significance; and
2. Development must preserve archaeological remains of national importance in situ and preserve archaeological remains of local importance in situ unless the public benefits of the development outweigh the loss of archaeological remains. Where archaeological remains cannot be preserved in situ the remains must be excavated, recorded, archived, published, interpreted and displayed through a detailed planned programme of works. There may also be a requirement for a programme of public engagement, in order that the results of significant archaeological discoveries are disseminated. The scale of this public engagement will be based upon on the significance and interest of the findings, but may involve site visits for the public or other means of on and off site viewing; and
3. Development must consider the archaeological interest and significance of sites that lie outside of an APA. Sites outside APAs will be assessed against the historic environment record for Southwark. Requirements will be secured by condition where necessary

Reasons

1. Southwark has immensely rich, varied and important archaeological sites. Archaeological research has revealed prehistoric sites, with early settlement and land management on the higher and drier islands and well-preserved waterlogged structures and deposits surviving in the channels and lower-lying intertidal areas. Romans settled on the banks of the Thames after AD 43 and set up the Roman provincial capital Londinium which spanned both sides of the river and included northern parts of Southwark. During this period major roads were built from Southwark to other Roman towns in the south of England.
2. Archaeological evidence for the Saxon period is more difficult to detect, but the northern borough developed rapidly in the medieval period and post-medieval period. The historic road system, villages, parishes and parks further south and east also contain important archaeological information about the developing rural community of Southwark. The historic village cores of Peckham, Camberwell, Rotherhithe, Walworth and Dulwich, have the potential for the survival of archaeological remains from many periods.
3. There are currently six Archaeological Priority Areas (APAs) in Southwark. An APA is a defined area where there is significant known archaeological interest or particular potential

for new archaeological discoveries. The designation of these areas is based on evidence held in the Greater London Historic Environment Record (GLHER), maintained by Historic England. Southwark's APAs are: •

- i. **APA1- North Southwark and Roman Roads**
- ii. **APA2 - Walworth Village**
- iii. **APA3 - Camberwell Village**
- iv. **APA4 - Peckham Village**
- v. **APA5 - Dulwich Village**
- vi. **APA6 - Lordship Lane Burial Mound**

4. Planning applications affecting sites within Archaeological Priority Areas (APAs) will be accompanied by an archaeological assessment and a report on the results of a field evaluation of the site, including an assessment of the impact of the proposed development on the archaeological resource. The assessment should identify and describe the significance of the archaeological interest of the site, including any contribution made by the archaeological setting of the site. Any harm or loss of archaeological resource resulting from development will require justification.

Relevant National and Local Designations

- 2.18 In terms of relevant designated heritage assets, as defined above and as shown on Figure 2, no designated World Heritage Sites, Scheduled Monuments, Historic Battlefield sites or Historic Wreck sites lie within the vicinity of the study site.
- 2.19 In terms of relevant local designations, the study site lies within an Archaeological Priority Zone for 'North Southwark and Roman Roads' as defined by the London Borough of Southwark (see Figure 2). This APZ is the largest in Southwark and covers a broad area including the historic core of Southwark, the entire river frontage, and the Roman radial roads leading to the historic core (HER Ref: DLO38558).
- 2.20 The GLHER has categorised the various areas of archaeological potential (included the Southwark APZs) within various London Boroughs into Tiers according to their archaeological potential and potential for significant archaeological remains, with Tier 1 being most significant. Tier 1 areas comprise heritage assets of national significance (a Scheduled Monument or equivalent), Tier 2 areas indicate the presence or likely presence of heritage assets of archaeological interest and Tier 3 areas refer to landscape zones of archaeological interest, while Tier 4 comprises land outside of the three Tiers defined above (Historic England 2016).
- 2.21 Tier 1, Archaeological Priority Area or Zones are described by Historic England (2016) as follows;
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.
- 2.22 The GLHER has categorised the North Southwark and Roman Roads APZ as Tier 1 due to the presence of nine Scheduled Monuments within the APZ, and the presence of further archaeological remains of potential national interest (HER Ref: DLO38558).

- 2.23 This is an extremely broad APZ covering a very wide area and intended to capture various areas of archaeological interest, much of which does not apply to the study site itself. Whilst it is categorised as Tier 1 by the GLHER, this rating does not indicate the presence of Tier 1 applicable archaeological remains across the full APZ.
- 2.24 In line with relevant planning policy and guidance, this desk based assessment seeks to clarify the site's archaeological potential and the need or otherwise for additional mitigation measures.

3 GEOLOGY AND TOPOGRAPHY

Geology

- 3.1 The solid geology of the London area is shown by the Institute of Geological Sciences (IGS 1979) as London Clay deposits forming the London Basin. Overlying the London Clay is a series of gravel terraces deposited during periods of glacial and inter-glacial conditions (Bridgland 1996).
- 3.2 Further detail is provided by the British Geological Survey (BGS Online 2021), which shows the underlying geology at the study site as London Clay Formation (Clay, Silt & Sand), overlain by Kempton Park river terrace gravels (Sand & Gravel). Kempton Park Gravels have been categorised as part of the Devensian Stage, the last glacial stage of the British Pleistocene epoch (Gibbard 1994: 90).
- 3.3 Whilst no site-specific borehole data is currently available, the British Geological Survey records previous boreholes to the immediate north which confirm the local geological sequence as comprising a gravel terrace overlying the London Clay bedrock. This is overlain by extensive depths of made ground.

Topography

- 3.4 The study site is generally level at c.2m Above Ordnance Datum (AOD). The River Thames is located c.1.5km to the west and c.1.2km to the north of the site as it loops eastwards around the northern part of Southwark.

4 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND WITH ASSESSMENT OF SIGNIFICANCE

Timescales used in this report

Prehistoric

Palaeolithic	900,000 -	12,000 BC
Mesolithic	12,000 -	4,000 BC
Neolithic	4,000 -	2,500 BC
Bronze Age (including Chalcolithic)	2,500 -	800 BC
Iron Age	800 -	AD 43

Historic

Roman	AD 43 -	410
Saxon/Early Medieval	AD 410 -	1066
Medieval	AD 1066 -	1485
Post Medieval	AD 1486 -	1799
Modern	AD 1800 -	Present

Introduction

- 4.1 This chapter reviews the available archaeological evidence for the study site and the archaeological/historical background of the study site and surrounding area, and, in accordance with NPPF, considers the potential for any as yet to be discovered archaeological evidence on the study site prior to any assessment of any later development or below ground impacts.
- 4.2 What follows comprises a review of known archaeological assets within a 300m radius of the study site (Fig. 2), also referred to as the study area, held on the Greater London Historic Environment Record (HER), together with a historic map regression exercise charting the development of the study area from the 17th century onwards until the present day.
- 4.3 In general, the majority of HER records within the study area comprise evidence for Roman period activity associated with settlement to the north at Southwark, as well as the Post Medieval development of Southwark.
- 4.4 The map regression exercise suggests that the study site may have been subject to minor activity during the Post Medieval period, to the rear of buildings fronting onto Newington Causeway to the immediate west. A 17th century Civil War fort was located to the immediate south west although is not anticipated to have extended into the study site. Initial development is first shown at the site most likely in the mid-19th century with an industrial works, which was later subject to serious damage during World War Two and entirely cleared and replaced with a paper works by 1950. Further clearance and alterations are shown to the northern part of the site to the present day.
- 4.5 Chapter 5 subsequently considers the site conditions, later development and below ground impacts, and whether the proposed development is likely to impact archaeological assets and potential archaeological assets identified below.

Previous Archaeological Work

- 4.6 The GLHER does not record any previous phases of archaeological work within the study site boundary itself.
- 4.7 An archaeological watching brief to the immediate west at nos. 63-67 Newington Causeway identified evidence for natural topography and modern development only (HER Ref: ELO4116, TQ 32125 79384). An evaluation at no. 87 Newington Causeway to the south identified only evidence for Modern truncation due to basements (HER Ref: ELO17706, TQ 3209 7930).

Early Prehistoric – Palaeolithic & Mesolithic

- 4.8 No Palaeolithic or Mesolithic artefacts or features are recorded within the 300m study area on the GLHER. The presence of early Prehistoric material can be notoriously difficult to predict and is typically dependent upon the presence of an appropriate underlying geology sequence (such as terrace gravels or brickearth), as well as suitable topography and access to nearby resources and water.
- 4.9 With regard to the Kempton Park Gravels, no archaeological remains and in particular Palaeolithic artefacts, appear to have been recorded anywhere from the Kempton Park Gravel (Wymer 1999, Map 9). This apparent absence of archaeological remains in the Kempton Park Gravel as a whole is consistent with the generally accepted absence from Britain of either Neanderthals or modern humans during the Ipswichian Period and their sparse and discontinuous presence during the whole of the post-Ipswichian period into which the Kempton Park Gravel may fit stratigraphically (CgMs & QUEST 2016).
- 4.10 On the basis of the available evidence, the archaeological potential of the study site for the Palaeolithic and Mesolithic periods is considered to be low.

Later Prehistoric – Neolithic, Bronze Age & Iron Age

- 4.11 A small pit, containing some charcoal and burnt flint, was identified during work at Brockham Street c.180m to the east of the study site. Although no dating evidence was identified from the pit, prehistoric flintwork and pottery sherds were found residually from later contexts (HER Ref: MLO72285, TQ 32344 79392).
- 4.12 No further evidence for the Later Prehistoric periods is known on the GLHER within the study area.
- 4.13 Overall, it is likely that the study site was located away from areas of occupation during the Neolithic, Bronze Age and Iron Age periods, and the paucity of evidence suggests a low archaeological potential can reasonably be considered at the site.

Roman

- 4.14 The site would have been situated within circa 500m to the south west of the Roman settlement at Southwark. The radial road to Kent would have been located circa 500m to the east, whilst a radial road to Chichester may have been located in the area of Borough High Street/Newington Causeway to the west of the study site (Margary 1955). Possible sections of this road have been observed at Newington Causeway to the west of the site (HER Ref: MLO3663, TQ 3200 7933; ELO15496, TQ 32024 79266), whilst a possible observation was made in 1824 at Elephant and Castle c.200m to the south (HER Ref: MLO4183, TQ 321 791). Typical archaeological features associated with Roman roads can include evidence for settlement and occupation, roadside ditches and associated land division, together with quarry pits, burials and chance losses.

- 4.15 Evidence for Roman activity in the study area is generally associated with cemetery activity at the north eastern part of the study area which has been identified in association with settlement at Southwark to the north (HER Refs: MLO4273, TQ 3240 7945; ELO15322, TQ 3237 7934; MLO7735, TQ 3250 7950; MLO7692, TQ 32225 79425). Further possible funerary evidence, including a cremation burial and possible funerary items, has been found at Skipton Street c.250m south west of the study site. Possible agricultural boundaries and a large pit were also identified (HER Ref: MLO22242, TQ 3190 7920).
- 4.16 Ditches and small finds, including coins and lamps, have also been found in the north eastern part of the study area (HER Refs: MLO22234, TQ 3238 7935; ELO3171, TQ 3238 7935; MLO4286, TQ 3235 7936; MLO14254, TQ 3224 7953; MLO23258, TQ 3220 7940; MLO72286, TQ 32343 79411), whilst cultivation soils containing Roman pottery sherds and ceramic building material have been found in the northern part of the study area (HER Refs: MLO75300, TQ 3225 7960; MLO4355, TQ 3210 7960; MLO75255, TQ 3225 7960; ELO17937, TQ 3224 7950). Alluvial deposits containing Roman artefacts, generally pottery sherds or ceramic material, have been identified to the south of the study site at Alexander Fleming House (HER Ref: MLO61092, TQ 3200 7910) and also at Tarn Street to the south (HER Ref: MLO98784, TQ 32117 79189) and to the east at Dickens Square (HER Ref: MLO22235, TQ 3238 7935).
- 4.17 Further Roman period findspots are limited to the neck and base of a late 1st century jug which was found at Elephant and Castle c.200m to the south of the study site in 1961 (HER Ref: MLO7806, TQ 3205 7915).
- 4.18 The archaeological evidence suggests that the study site would have been located within open land to the south of settlement at Southwark and adjacent to a likely road during the Roman period. The identification of plough soils and alluvial layers suggest a cultivated landscape that may have also been periodically subject to water inundation. Overall, the archaeological potential at the study site for the Roman period can be considered as moderate, given the site's proximity to the adjacent posited Roman road.

Saxon/Early Medieval & Medieval

- 4.19 No finds of Saxon date have been recorded within the vicinity of the study site. The only deposit dated to the Saxon period in the study area comprises a "dark earth" deposit of 1m thickness, found overlying earlier features at Dickens Square c.300m east of the study site. This may have comprised an alluvial deposit overlying Roman features and dated to the Saxon and/or Medieval period (HER Ref: MLO22233, TQ 3238 7935). Further alluvial deposits of Saxon or Medieval date are recorded at Tarn Street c.200m south of the study site, which were thought to represent the periodic flooding of late Roman to Medieval period Southwark and Lambeth (HER Ref: MLO98785, TQ 32117 79189).
- 4.20 The Domesday Survey of 1086 records early Medieval estates at Southwark to the north of the site and at Walworth to the south (Open Domesday Online 2021).
- 4.21 Evidence for Medieval activity within the study area is limited to a boundary or drainage ditch found at Brockham Street c.180m to the east of the study site (HER Ref: MLO72288, TQ 32340 79392), residual pottery sherds found in ploughsoil at the northern extent of the study area (HER Refs: MLO75301, TQ 3225 7960; MLO75256, TQ 3225 7960; MLO4355, TQ 3210 7960), and tiles found at New Kent Road c.350m to the south (HER Ref: MLO89483, TQ 32141 79072).
- 4.22 Current evidence suggests that the study site would have most likely been located within open land to the south of settlement at Southwark, and possibly still adjacent to the former Roman road, during the Saxon and Medieval periods. Overall, a generally low archaeological potential can be suggested at the study site for the Saxon period, and a moderate potential suggested for the Medieval period, although evidence for occupation or settlement is considered unlikely.

Post Medieval & Modern (including map regression exercise)

- 4.23 A number of the HER records within the study area refer to Post Medieval and Modern archaeological remains which are not discussed in detail here unless relevant to the study site.
- 4.24 During the later Post Medieval and Modern periods, our understanding of settlement, land-use and the utilisation of the landscape is enhanced by cartographic and documentary sources, which can give additional detail to data contained within the HER.
- 4.25 The earliest such cartographic source is an early 18th century plan of the English Civil War Defences at London (1642-43) as depicted on Figure 3. The GLHER notes the location of a civil war fort at Newington Causeway to the immediate south west of the site, apparently within close proximity to the study site (HER Ref: MLO11403, TQ 3201 7927). The fort would have been sited to defend this southern approach to the settlement at Southwark and consequently at London.
- 4.26 A 1682 Morgan Plan of London (Fig. 4) appears to depict the study site within land to the rear of buildings fronting onto Newington Causeway to the west. The site may have been located within rear gardens, yard areas, or open land. This is further shown on a 1746 plan (Fig. 5).
- 4.27 By circa 1790 (Fig. 6), a track or road is shown to the immediate north of the study site, which may represent an early route of what is now Avonmouth Street. The exact location of the site is unclear, and it may have been developed or within immediate proximity to development at this time. The 1795 Horwood Plan (Fig. 7) is more detailed. A building is possibly shown to the immediate west or slightly within the western site boundary, whilst a residential terrace is shown to the immediate east.
- 4.28 An 1828 Cruchley Plan of London (Fig. 8) shows that Avonmouth Street bordered the north and eastern site boundaries, although the site itself does not appear to have been developed at that time. The 1850 St Mary Newington Parish Tithe Map does not show the site in detail (Fig. 9), although usefully shows the site bounded by roads at Avonmouth Street and Tiverton Street to the north, east, and south.
- 4.29 An 1872 Ordnance Survey plan (Fig. 10) is the first detailed plan of the site, when it was comprised of buildings which made up part of an Oilcloth Manufactory. These buildings extended from the site to the west which has been subject to a previous archaeological watching brief which identified evidence only for natural topography and modern development likely associated with this 19th works, as well as later 20th century redevelopment (HER Ref: ELO4116, TQ 32125 79384).
- 4.30 Minor changes and alterations are shown to these buildings by 1889 (Fig. 11) when a Goad Fire Insurance Plan was produced. The site appears to have comprised buildings utilised as sheds, a smithy, a carpenter's buildings, and warehouses. There is no apparent mention of basements on this plan. Further extensions are shown to those buildings within the site by 1896 (Fig. 12) and again in 1916 (Fig. 13).
- 4.31 The 1939-45 London County Council Bomb Damage map (Fig. 14) shows serious damage to the main building within the site during World War Two bombing action. The site was apparently entirely cleared after the war and the Atlas Paper Works was constructed on the site by 1950 (Fig. 15). This building also appears to extend onto the site to the west which was subject to previous monitoring.
- 4.32 Further demolition and alterations are shown at the northern part of the study site in the 1980s (Fig. 16) as the northern part of the site was cleared of development. No further apparent change is shown to the present day (Fig. 17).
- 4.33 The map regression exercise suggests that the study site may have been subject to minor activity during the Post Medieval period, to the rear of buildings fronting onto Newington Causeway to the immediate west. A 17th century Civil War fort was located to the immediate south west although is

not anticipated to have extended into the study site. Initial development is first shown at the site most likely in the mid-19th century with an industrial works, which was later subject to serious damage during World War Two and entirely cleared and replaced with a paper works by 1950. Further clearance and alterations are shown to the northern part of the site to the present day.

- 4.34 Therefore, aside from remains associated with known modern development, a low archaeological potential is considered at the study site for the Post Medieval and Modern periods. Modern building foundations of negligible significance are likely to be present which are not discussed further in this assessment.

Negative Evidence

- 4.35 An archaeological watching brief to the immediate west at nos. 63-67 Newington Causeway identified evidence for natural topography and modern development only (HER Ref: ELO4116, TQ 32125 79384). An evaluation at no. 87 Newington Causeway to the south identified only evidence for Modern truncation due to basements (HER Ref: ELO17706, TQ 3209 7930).
- 4.36 A number of further phases of work in the nearby area have identified no archaeological remains or have only identified evidence for severe Modern ground disturbance (HER Refs: ELO15495, ELO15802, ELO19986, ELO14406).

Assessment of Significance

- 4.37 Existing national policy guidance for archaeology (the NPPF as referenced in section 2) enshrines the concept of the 'significance' of heritage assets. Significance as defined in the NPPF centres on the value of an archaeological or historic asset for its 'heritage interest' to this or future generations.
- 4.38 No relevant nationally significant designated heritage assets as defined in the NPPF are recorded within, or within the vicinity of, the study site. Additionally, there are no non-designated archaeological assets recorded within the study site by the GLHER. Archaeological works to the immediate west identified no evidence for archaeological remains, with extensive truncation apparent, and those industrial works at that adjacent site extended into the study site boundary.
- 4.39 The study site lies within an Archaeological Priority Zone for 'North Southwark and Roman Roads' as defined by the London Borough of Southwark (see Figure 2). This APZ is the largest in Southwark and covers a broad area including the historic core of Southwark, the entire river frontage, and the Roman radial roads leading to the historic core (HER Ref: DLO38558).
- 4.40 Based on current evidence, and prior to an assessment of modern development impacts, a moderate archaeological potential would be identified at the study site for the Roman period, as well as for Medieval land division and agricultural activity. A 17th century Civil War fort was located to the south west although is not anticipated to have extended into the study site. Evidence for Modern building foundations is to be anticipated. A low archaeological potential would be identified for all other past periods of human activity within the study site.
- 4.41 If any archaeological remains were present, the significance of those remains would be derived from their evidential value and contributions that could be made towards local research agendas.
- 4.42 Whilst it is possible that archaeological remains could be present within the site, on the basis of the above, any remains, should they occur on the study site, would in the context of the Secretary of State's non-statutory criteria for Scheduled Monuments (DCMS 2013) most likely be of up to a local significance only, although would perhaps more likely comprise Modern foundations of negligible significance.

- 4.43 As identified by desk based work, archaeological potential by period and the likely significance of any archaeological remains which may be present within the study site is summarised in table form below:

Period:	Identified Archaeological Potential and Likely Significance (if present):
Early Prehistoric (Palaeolithic & Mesolithic)	Low potential, Low (Local) Significance;
Later Prehistoric (Neolithic, Bronze Age & Iron Age)	Low potential, Low (Local) Significance;
Roman	Moderate potential in particular for evidence associated with the posited Roman road to the immediate west, Low (Local) Significance;
Saxon	Low potential, Low (Local) Significance;
Medieval	Moderate potential (most likely to comprise evidence for land division and agricultural activity rather than settlement), Low (Local) Significance;
Post Medieval & Modern	Low potential (likely to be entirely invested in evidence of ground consolidation and surviving traces of 19 th and 20 th century development), likely to be of Negligible to Low (None/Local) Significance.

5 SITE CONDITIONS, THE PROPOSED DEVELOPMENT & REVIEW OF POTENTIAL DEVELOPMENT IMPACTS ON ARCHAEOLOGICAL ASSETS

Site Conditions

- 5.1 The study site currently comprises Avonmouth House and associated buildings and hardstanding (Fig. 17).
- 5.2 Modern phases of development, demolition and redevelopment on the site since at least the mid-19th century are likely to have had a cumulative negative archaeological impact. Industrial works building located within the site during the 19th and 20th centuries have been shown to extend westwards from the site, into an area that has been subject to archaeological monitoring. That monitoring identified only evidence for natural topography and modern disturbance. It is likely that those works buildings will have had a similar severe negative impact within the site boundary as well.
- 5.3 World War Two bomb damage sustained at the study site together with post-war demolition and clearance is likely to have had a severe localised impact on any underlying archaeology.
- 5.4 Past agricultural/horticultural land use will have had a moderate but widespread archaeological impact as a result of past ploughing and possible rear garden activity.

Proposed Development

- 5.5 Development proposals comprise demolition of existing building and structures and erection of a part 2, part 7, part 14, part 16 storey plus two basement levels, mixed-use development comprising 1733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure. Proposals include a basement level (see Figures 18-19).
- 5.6 Development proposals are located within the footprint of existing and historic phases of development at the site. Archaeological monitoring of construction works to the immediate west of the site identified evidence only for natural topography and modern truncation across an area of industrial works which is known to have extended into the study site boundary.

Review of Potential Development Impacts on Archaeological Assets

- 5.7 The proposed development will not impact on any designated archaeological assets.
- 5.8 The study site is located within an Archaeological Priority Zone as identified by the London Borough of Southwark. The GLHER has defined this APZ as a Tier 1 APZ.
- 5.9 Prior to an assessment of modern ground disturbance impacts, this assessment identified a moderate archaeological potential at the site for the Roman and Medieval periods. A 17th century Civil War fort was located to the south west although is not anticipated to have extended into the study site. Evidence for Modern building foundations is to be anticipated at the site. A low potential was identified for all other past periods of human activity. It was concluded that, if present, any remains would most likely be of up to a local significance only.

- 5.10 However, Modern development impacts are likely to have been severe at the site, due to extensive industrial development in the mid-19th century, bomb damage during World War Two, and subsequent phases of clearance, demolition, and redevelopment to the present day. These historic 19th and 20th century industrial works have extended outside the site to the immediate west where a previous programme of archaeological monitoring identified no evidence for archaeological remains, indicative of widespread truncation and ground disturbance. These same industrial works are likely to have had a similarly severe impact within the study site and thereby reduced the site's archaeological potential.
- 5.11 Overall, given the likely extent of past ground disturbance, it is considered that the study site retains only a limited archaeological potential. Whilst the site's location within a locally defined Archaeological Priority Zone is acknowledged, it is considered unlikely that the proposed development would have either a significant or widespread archaeological impact.

6 SUMMARY AND CONCLUSIONS

- 6.1 The site at Avonmouth House, 6 Avonmouth Street, Elephant & Castle SE1 6NX is under consideration for development. Policy 3.19 of the Saved Southwark Local Plan (2007, saved in 2013) requires that any development within an Archaeological Priority Zone in the Borough must be accompanied by an archaeological assessment and evaluation of the site. Therefore, in accordance with relevant government planning policy and guidance, a desk based assessment has been undertaken to clarify the below ground archaeological potential of the study area.
- 6.2 In terms of relevant designated archaeological assets, no designated World Heritage Sites, Scheduled Monuments, Historic Battlefield sites or Historic Wreck sites lie within the vicinity of the study site.
- 6.3 In terms of relevant local designations, the study site lies within an Archaeological Priority Zone for 'North Southwark and Roman Roads' as defined by the London Borough of Southwark (see Figure 2). This APZ is the largest in Southwark and covers a broad area including the historic core of Southwark, the entire river frontage, and the Roman radial roads leading to the historic core. This is an extremely broad APZ covering a very wide area and intended to capture various areas of archaeological interest, much of which does not apply to the study site itself. Whilst it is categorised as Tier 1 by the GLHER, this rating does not indicate the presence of Tier 1 applicable archaeological remains across the full APZ.
- 6.4 Based on current evidence, and prior to an assessment of modern development impacts, a moderate archaeological potential would be identified at the study site for the Roman period, as well as for Medieval land division and agricultural activity. A 17th century Civil War fort was located to the south west although is not anticipated to have extended into the study site. Evidence for Modern building foundations is to be anticipated. A low archaeological potential would be identified for all other past periods of human activity within the study site.
- 6.5 However, Modern development impacts are likely to have been severe at the site, due to extensive industrial development in the mid-19th century, bomb damage during World War Two, and subsequent phases of clearance, demolition, and redevelopment to the present day. These historic 19th and 20th century industrial works have extended outside the site to the immediate west where a previous programme of archaeological monitoring identified no evidence for archaeological remains, indicative of widespread truncation and ground disturbance. These same industrial works are likely to have had a similarly severe impact within the study site and thereby reduced the site's archaeological potential.
- 6.6 Overall, given the likely extent of past ground disturbance, it is considered that the study site retains only a limited archaeological potential for remains of up to a local significance only. Whilst the site's location within a locally defined Archaeological Priority Zone is acknowledged, it is considered unlikely that the proposed development would have either a significant or widespread archaeological impact.
- 6.7 In this particular instance, this assessment is considered sufficient to satisfy the pre-planning requirements of Policy 3.19 of the Saved Southwark Local Plan (2007, saved in 2013) and no further archaeological works are recommended to support a planning application. The Southwark Borough Archaeologist may take a precautionary approach and request further archaeological work if it cannot be suitably demonstrated that extensive past impacts have reduced the archaeological potential of the site. This may be further informed by site geotechnical information or archaeological monitoring of such work.
- 6.8 Given the conclusions of this assessment and that high significance remains which might preclude development are not anticipated at the site, any such further work could reasonably be secured by attaching an appropriately worded planning condition to the granting of planning consent.

Sources Consulted

General

British Library
Greater London Historic Environment Record
London Metropolitan Archive
Southwark Local History Centre
The National Archive

Internet

Bombsight – <http://bombsight.org/#17/51.49200/-0.03924>
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Cartographic

1682 Morgan Plan of London

1729 Senex Map of Surrey

1738 Vertue Plan of London Civil War Defences 1642-43

1740 Plan of Southwark

1746 Rocque Map of London

1766 Rocque Map of London & Environs

1768 Kitchin Plan of London

1768 Rocque Map of Surrey

1770 Kitchin Plan of London

1789 Bowles Plan of London

c.1790 Bonnisselle Plan of London

1793 Lindley & Crosley Map of Surrey

1795 Horwood Plan of London

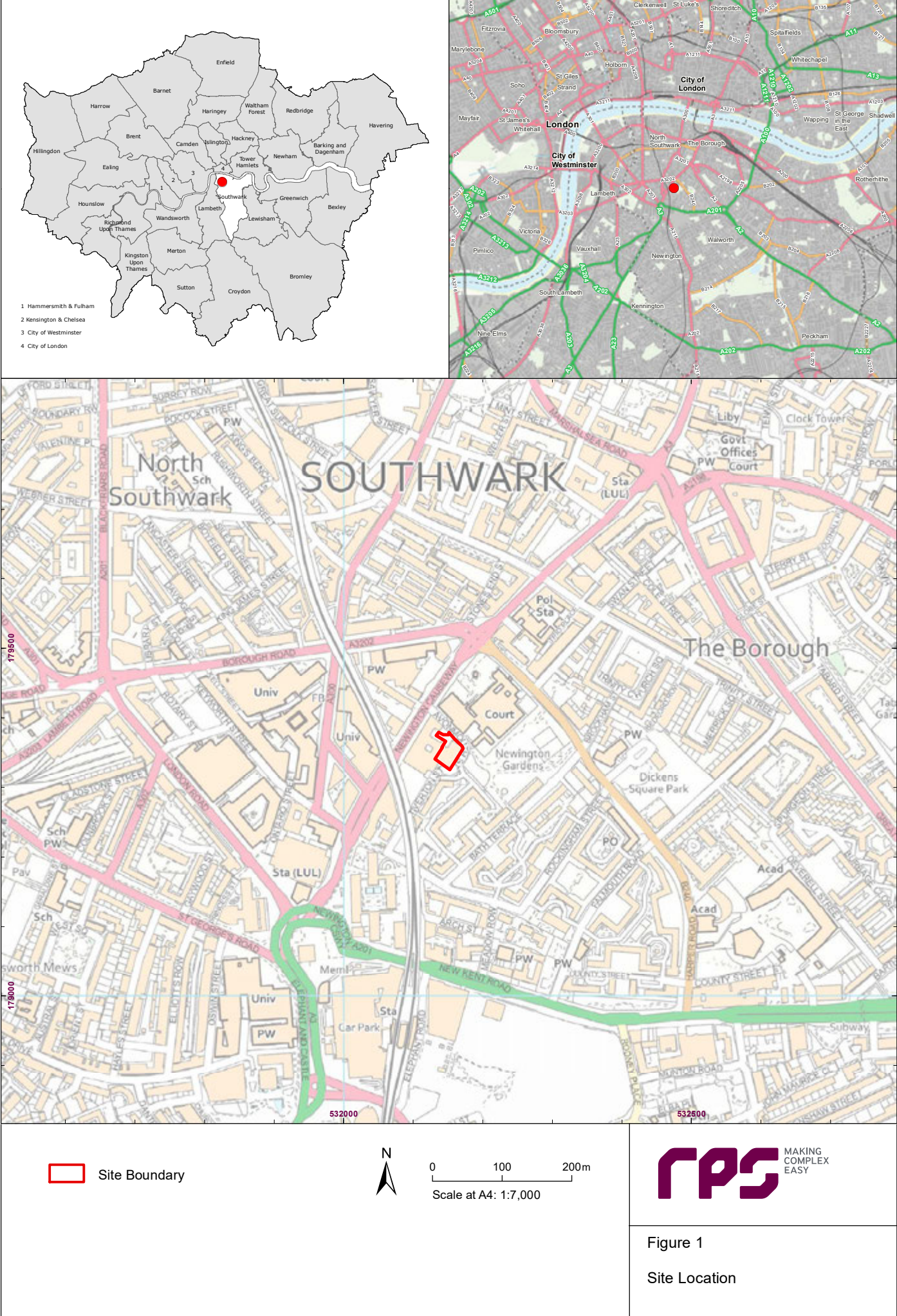
1797 Wallis Plan of London

1800 Milne Plan of London & Westminster

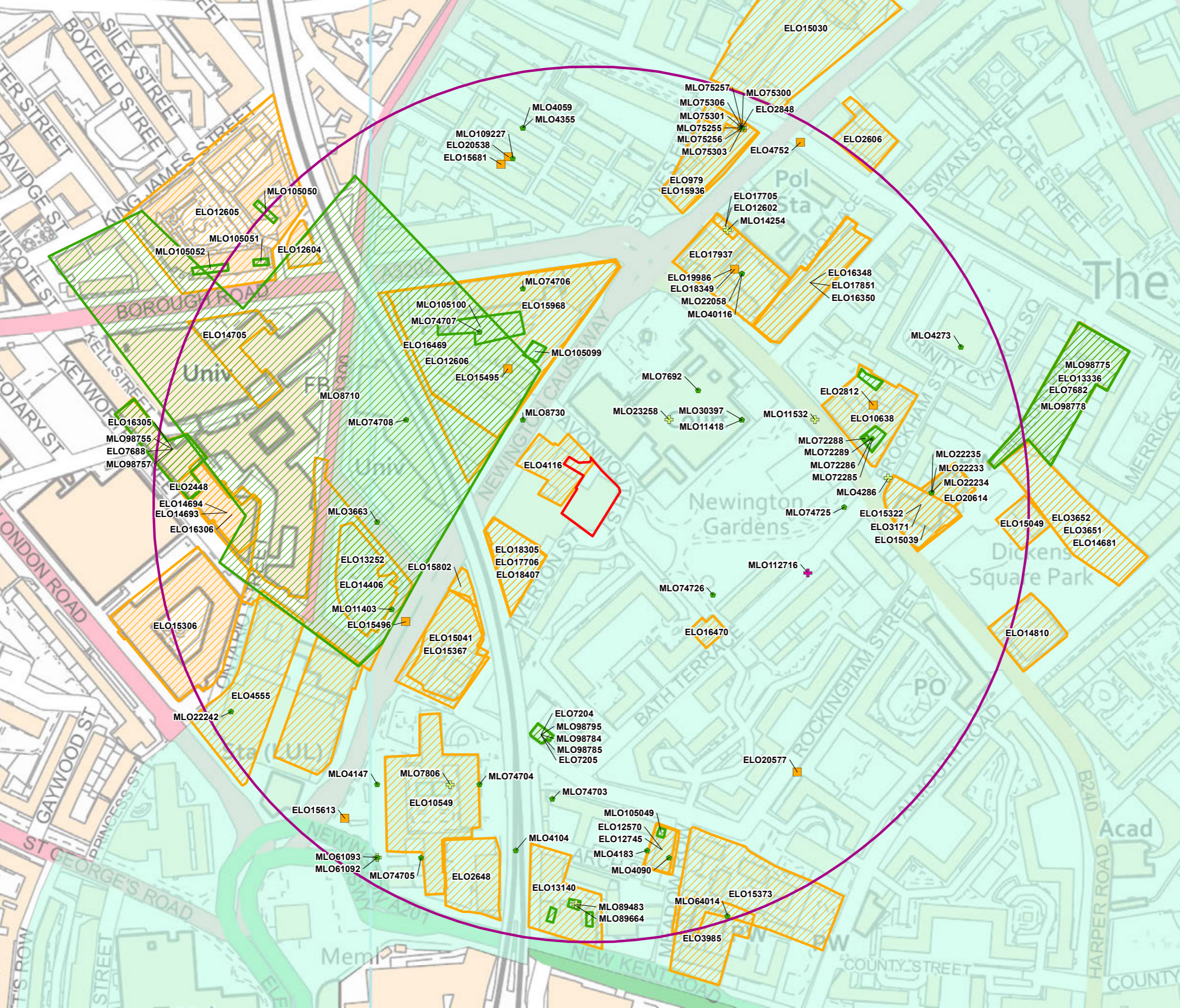
1823 C&J Greenwood Map of Surrey

1828 Cruchley Plan of London
1835 Cross Plan of London
1848-49 Wyld Plan of London
1850 St Mary Newington Parish Tithe Map
1872 Ordnance Survey (1:1056)
1879 Ordnance Survey (1:2500)
1888 Bacon Plan of London
1889 Goad Fire Insurance Plan
1896 Ordnance Survey (1:1056)
1896 Ordnance Survey (1:2500)
1916 Ordnance Survey (1:2500)
1939-LCC Bomb Damage Map
1945 Aerial Photograph
1950 Ordnance Survey (1:1250)
1960 Ordnance Survey (1:1250)
1969 Ordnance Survey (1:1250)
1983-87 Ordnance Survey (1:1250)
1991 Ordnance Survey (1:1250)
2003 Ordnance Survey (1:1250)
2020 Google Earth Image

FIGURES



Project Ref: N127000-27999/27293 - Avonmouth House, 6 Avonmouth Street[Figures\Mapping\GIS\Projects\HER Plot.mxd



Legend

Site Boundary

300m search radius

Non-designated Heritage Assets:

HER Records Points

Monuments

Findspots

PAS

HER Records Polygons

Monuments

Archaeological Priority Zones

DLO38558 - North Southwark and Roman Roads

Previous Archaeological Work:

HER Events Points

HER Events Polygons

N

0

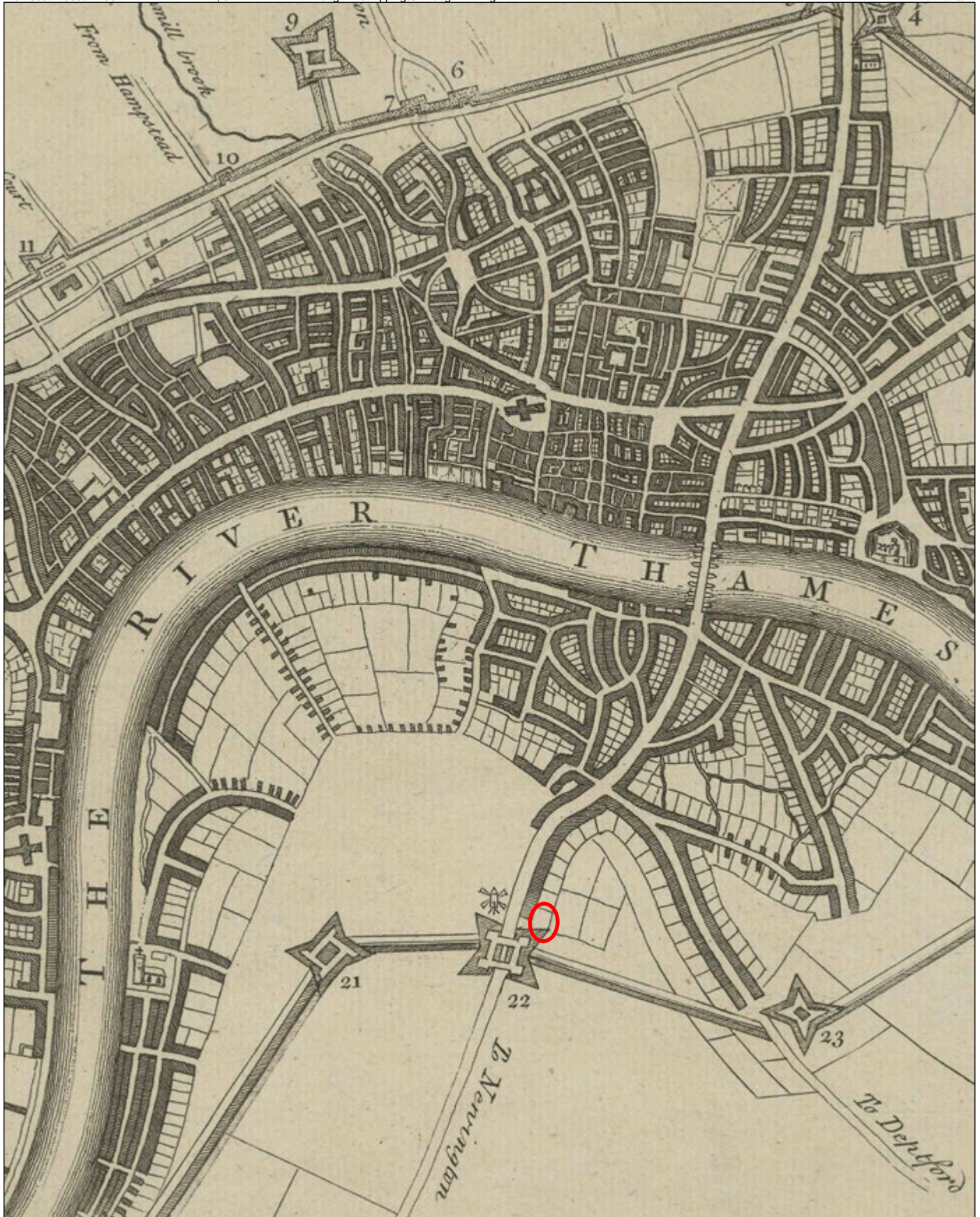
25

50m

Scale at A3: 1:2,500



Figure 2
HER Plot (Data from Greater London HER)



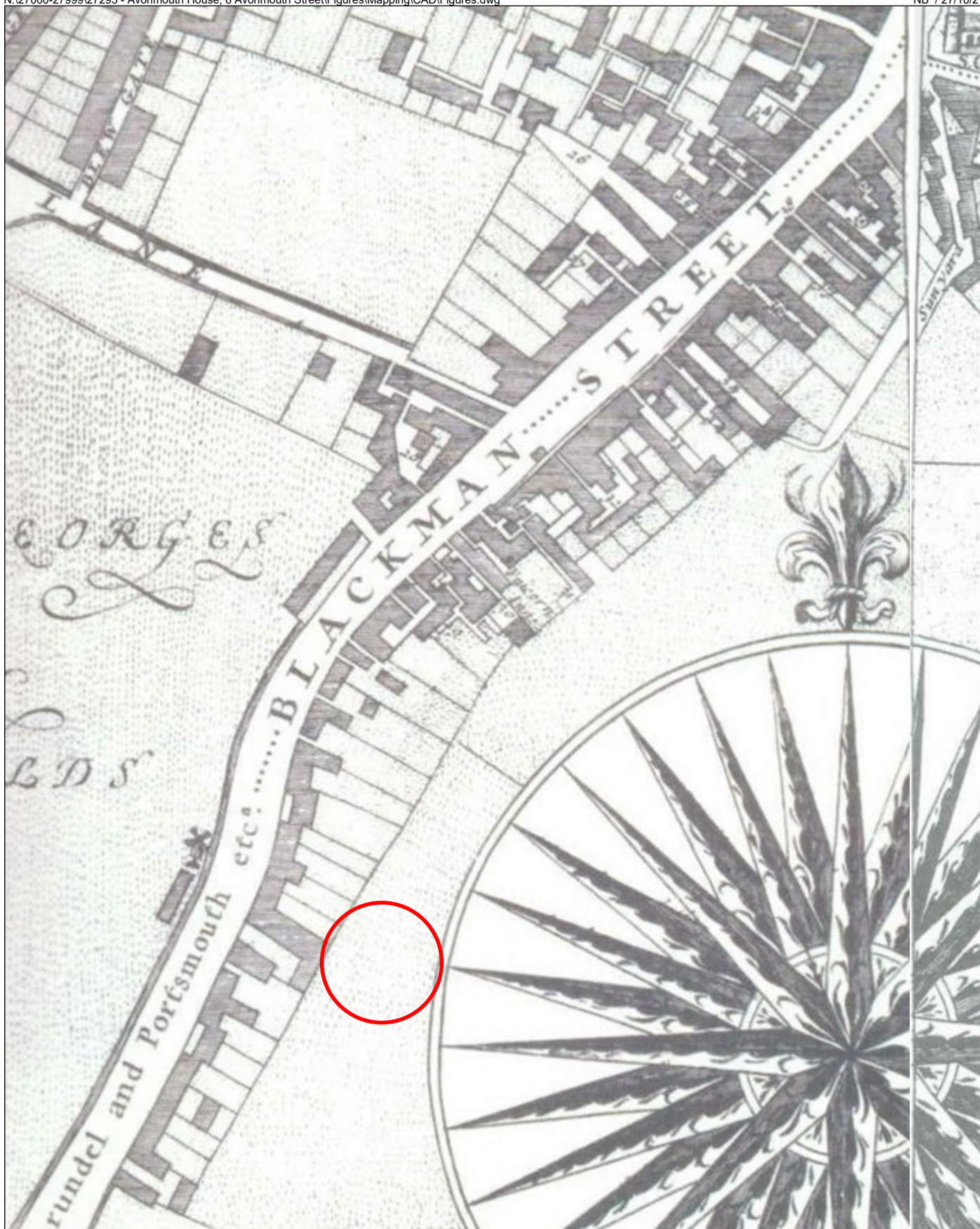
Approximate site location



Not to Scale
Illustrative Only



Figure 3
1642-3 Plan of London Civil War
Defences drawn in 1738 by
Vertue



Approximate site location



Not to Scale
Illustrative Only



Figure 4

1682 Morgan Plan of London



Approximate site location

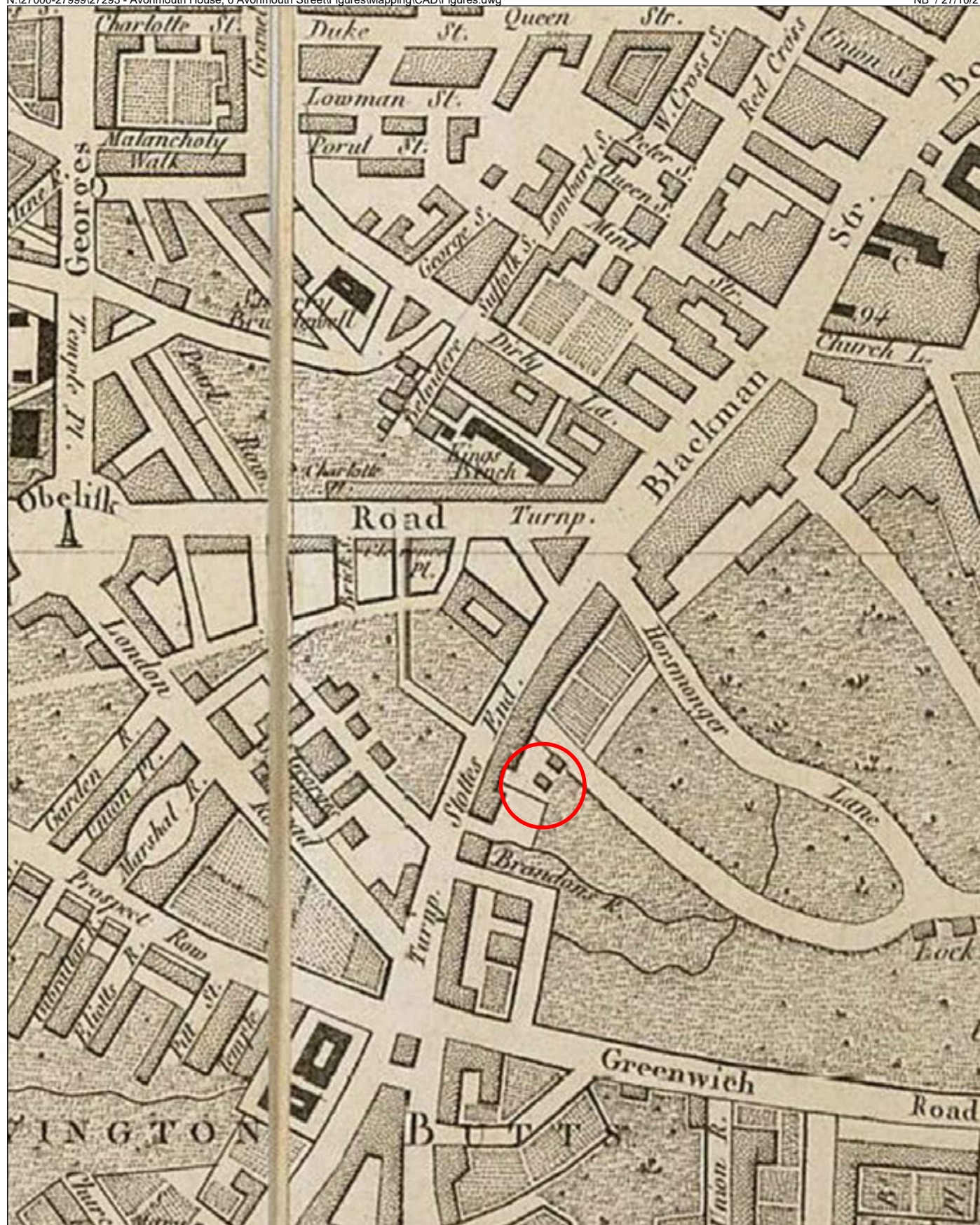


Not to Scale
Illustrative Only



Figure 5

1746 Rocque Map of London



Approximate site location

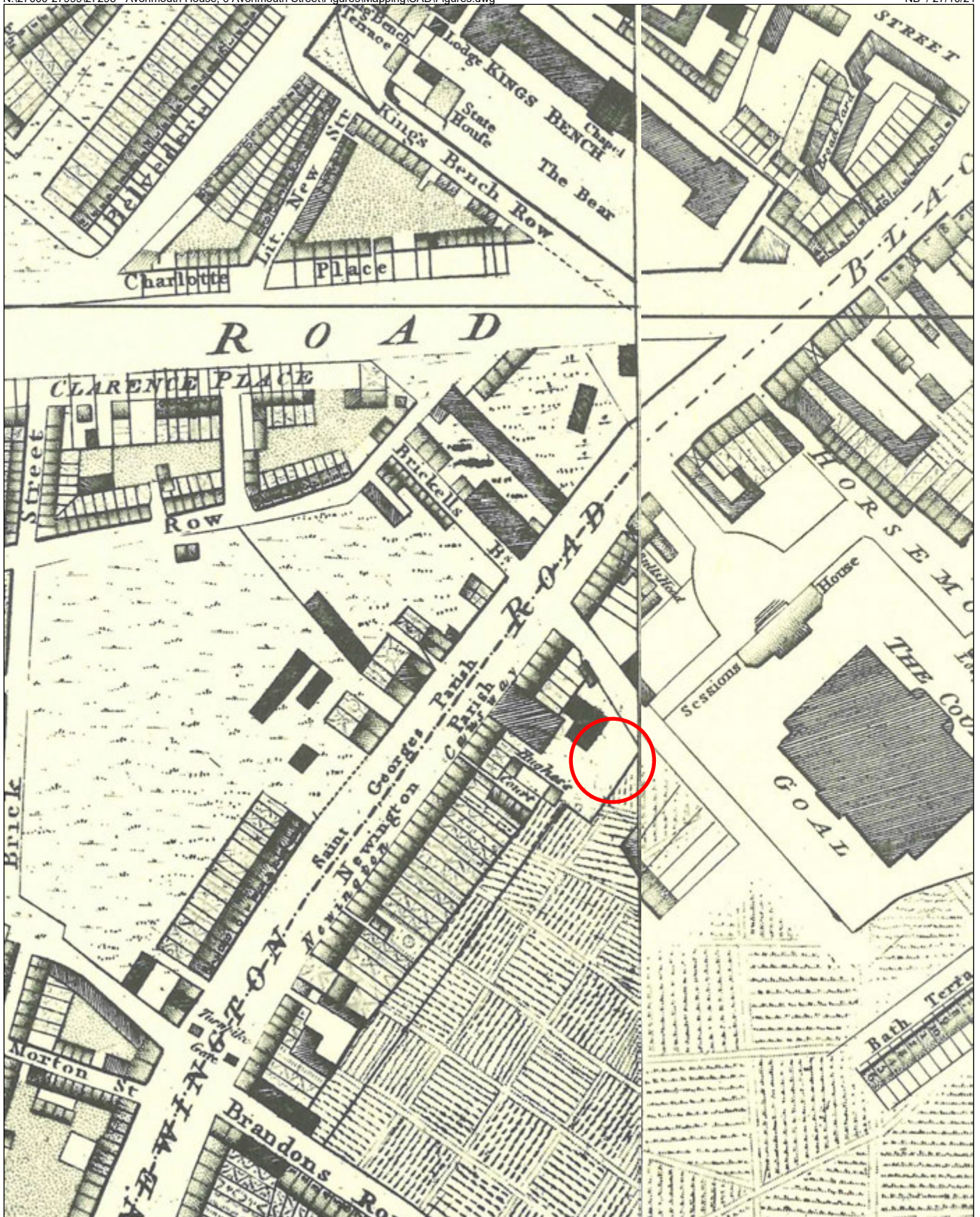


Not to Scale
Illustrative Only



Figure 6

c. 1790 Bonniselle Plan of
London



Approximate site location



Not to Scale
Illustrative Only



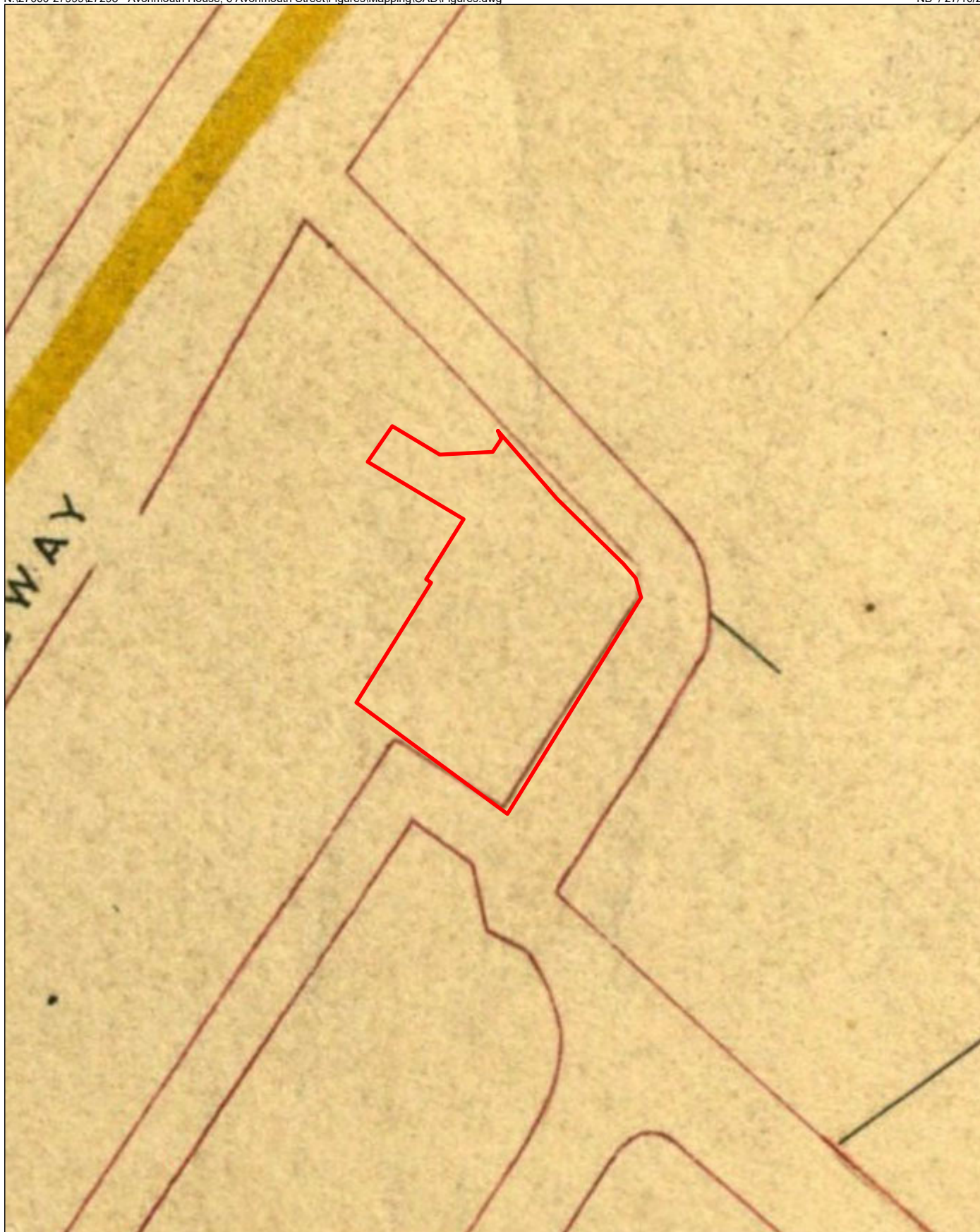
Figure 7

1795 Horwood Plan of London



**MAKING
COMPLEX
EASY**

1828 Cruchley Plan of London



 Site Boundary

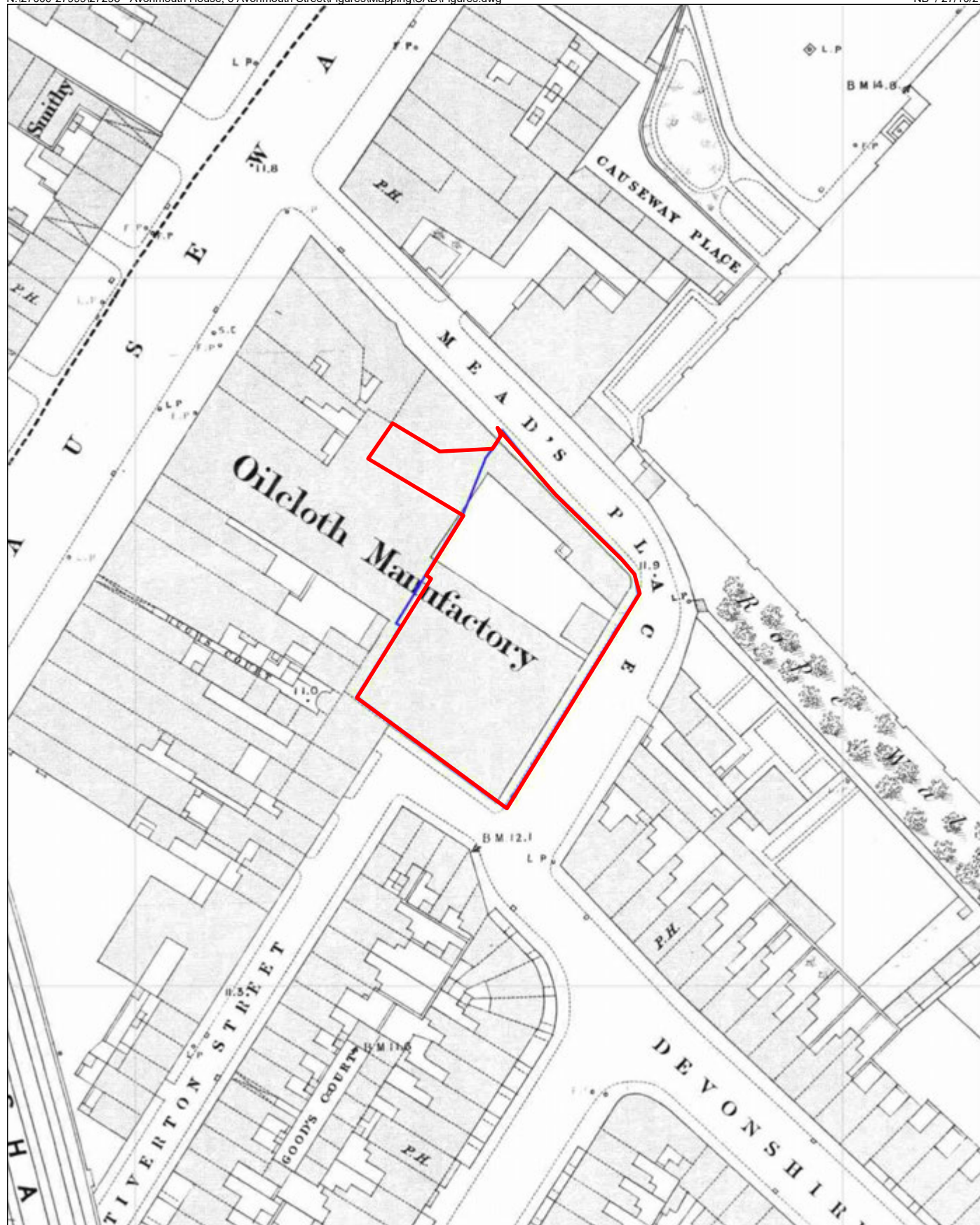


0 10 20m
Scale at A4: 1:750



Figure 9

1850 St Mary Newington Parish
Tithe Map



 Site Boundary



0 10 20m
Scale at A4: 1:750

rps MAKING
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EASY

Figure 10

1872 Ordnance Survey Map

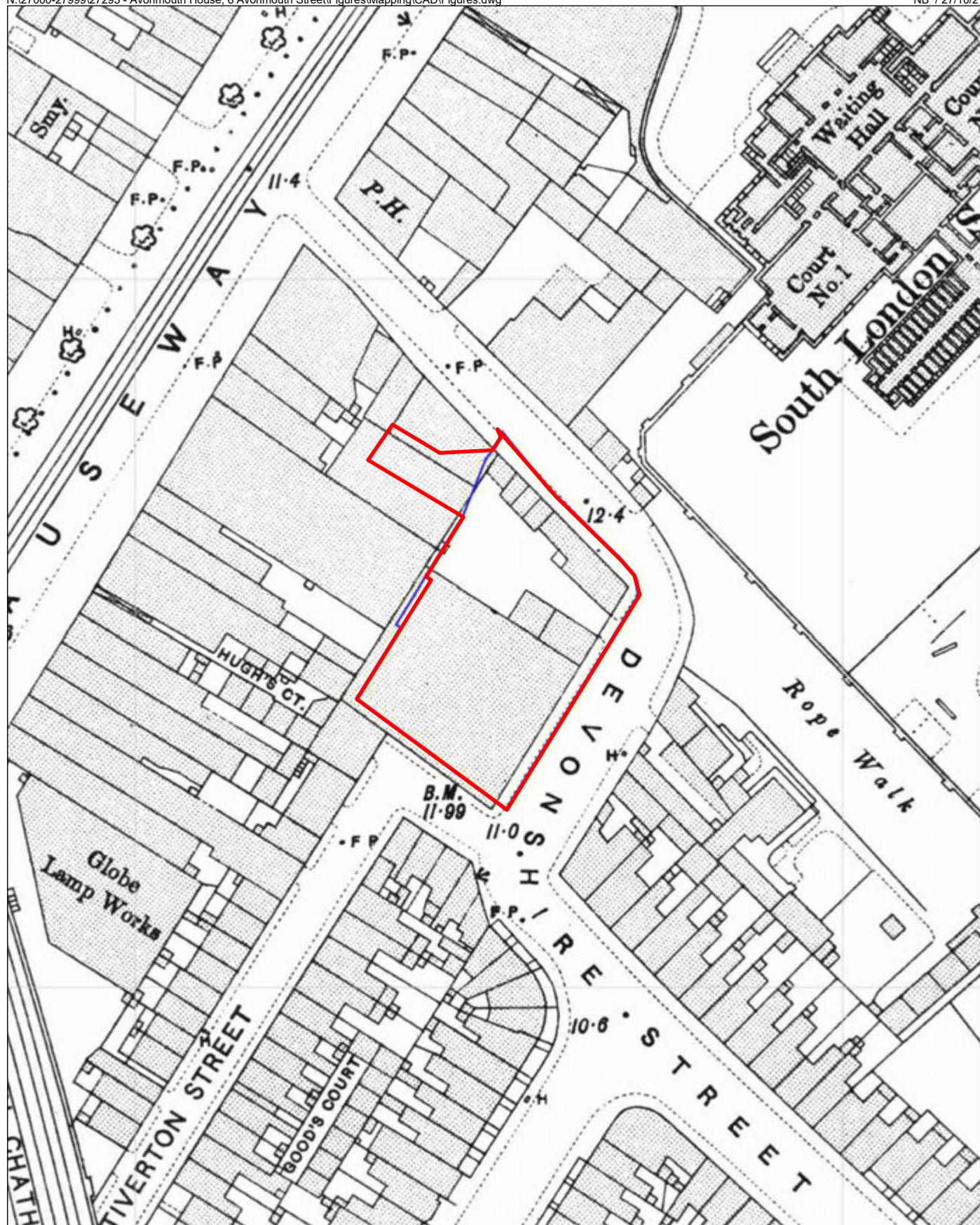


0 5 10m
Scale at A4: 1:500



Figure 11

1889 Goad Fire insurance Plan



 Site Boundary

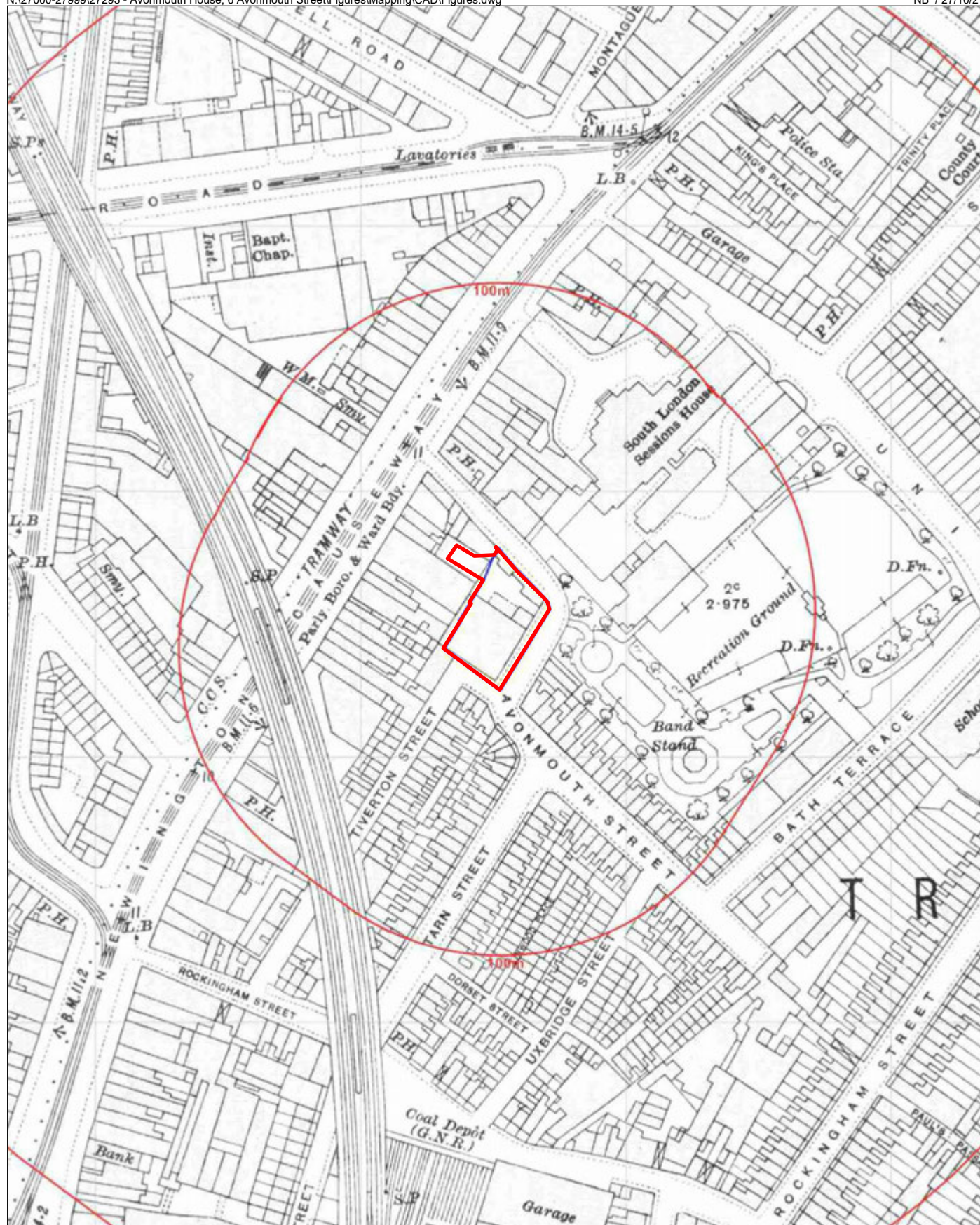


0 10 20m
Scale at A4: 1:750

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Figure 12

1896 Ordnance Survey Map



 Site Boundary



0 10 20m
Scale at A4: 1:1,000



Figure 13

1916 Ordnance Survey Map



 Site Boundary

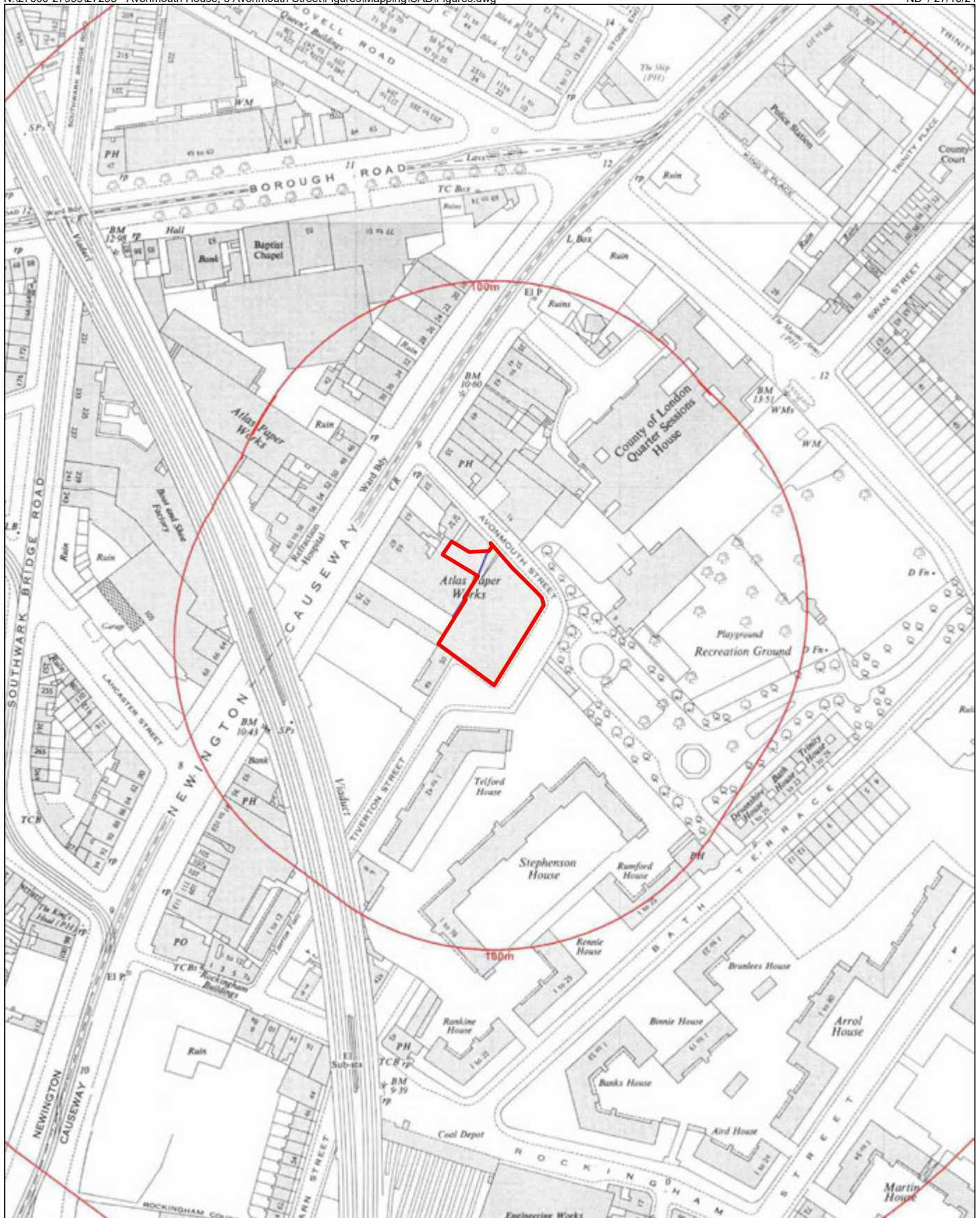


0 10 20m
Scale at A4: 1:1,000

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Figure 14

1939-1945 LCC Bomb Damage
Map



 Site Boundary



0 10 20m
Scale at A4: 1:1,000

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Figure 15

1950 Ordnance Survey Map

Figure 16

1983-1987 Ordnance Survey Map



 Site Boundary

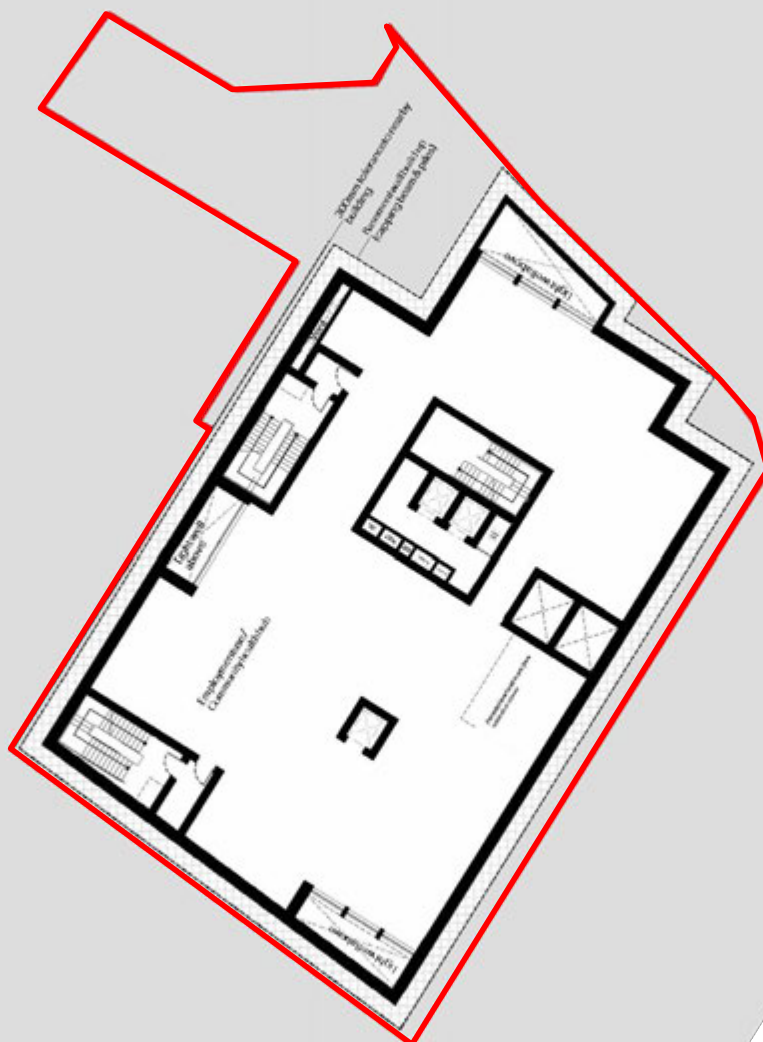


0 5 10m
Scale at A4: 1:500



Figure 17

2020 Google Earth Image



 Site Boundary



0 2 4 6 8 10m
Scale at A4: 1:400



Figure 18

Indicative Development -
Basement Plan



 Site Boundary



0 2 4 6 8 10m
Scale at A4: 1:400



Figure 19

Indicative Development -
Ground Floor Plan



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