

ARCHAEOLOGICAL DESK-BASED ASSESSMENT

Eltham Palace, Court Yard, London SE9

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ARCHAEOLOGICAL DESK BASED ASSESSMENT

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EXECUTIVE SUMMARY

An area of proposed development within the site of Eltham Palace, Court Yard, London SE9, has been reviewed for its below ground archaeological potential.

In terms of relevant, nationally significant designated heritage assets, no World Heritage Sites, Historic Wrecks or Historic Battlefields lie within the study site or its immediate vicinity.

The bulk of Eltham Palace and its associated grounds comprise a nationally significant designated Scheduled Monument.

In terms of relevant local designations, the study site lies within an Area of High Archaeological Potential, as defined by the Royal Borough of Greenwich and their archaeological planning advisors.

Redevelopment proposals comprise the creation of an access ramp to the existing visitors centre.

The area of proposed development has previously been subject to archaeological monitoring during the creation of the existing visitors centre, when no archaeological remains of significance were identified.

No further archaeological mitigation measures are therefore proposed in this particular instance.

The area of proposed development lies to the east of the Scheduled designation. Above ground heritage issues including the setting of the Scheduled Monument in relation to the proposed development have been considered in additional documentation prepared by RPS.

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1 INTRODUCTION AND SCOPE OF STUDY

- 1.1 This below ground archaeological desk based assessment has been prepared by RPS on behalf of English Heritage.
- 1.2 The subject of this assessment comprises the study site, also referred to as the area of proposed development, within the wider Eltham Palace site, Court Yard, London SE9. The study site is centred at TQ42417 73972 within the Royal Borough of Greenwich (see Figures 1-2 and 19).
- 1.3 Figure 2 spatially summarises relevant cultural heritage designations and archaeological findspot references in relation to the study site, primarily using data from the Greater London Historic Environment Record (GLHER).
- 1.4 In terms of relevant designated heritage assets, the study site does not lie within the vicinity of a World Heritage Site, Historic Battlefield or Historic Wreck.
- 1.5 The bulk of Eltham Palace and associated grounds comprise a nationally significant designated Scheduled Monument. The area of proposed development lies to the east of the eastern boundary of this designation.
- 1.6 In terms of relevant local designations, the study site lies within an Area of High Archaeological Potential, as defined by the Royal Borough of Greenwich and their archaeological advisors at the Greater London Archaeological Advisory Service (GLAAS).
- 1.7 English Heritage have therefore commissioned RPS to establish the below ground archaeological potential of the study site, and to provide guidance on ways to accommodate any archaeological constraints identified.
- 1.8 In accordance with relevant policy and guidance on archaeology and planning, including 'Standard and Guidance for Historic Environment Desk-Based Assessments' (Chartered Institute for Archaeologists, 2017), this assessment draws together the available archaeological, topographic and land-use information in order to clarify the archaeological potential of the study site.
- 1.9 This desk based assessment comprises an examination of evidence on the Greater London Historic Environment Record (GLHER) and other sources, including Greenwich Local Studies Library and the London and Metropolitan Archives. The results of previous archaeological works have been reviewed and synthesised as relevant (see Section 4 below and Figure 18). A site visit was undertaken during August 2019.
- 1.10 The assessment thus enables relevant parties to assess the archaeological potential of various parts of the study site, together with the likely significance of that potential, and to consider the need for design, civil engineering, and archaeological solutions to the archaeological potential and significance identified.
- 1.11 Above ground heritage issues including the setting of the Scheduled Monument in relation to the proposed development have been considered in documentation prepared by RPS.

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), and it was last updated in February 2019. The NPPF is supported by the National Planning Practice Guidance (NPPG), which was published online 6th March 2014 and last updated 22 February 2018 (<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>).
- 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 that heritage makes to 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 189 states that planning decisions should be based on the significance of the heritage asset and that 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 positively identified as having a degree of significance meriting consideration in planning decisions. They include designated heritage assets (as defined in the NPPF) and assets identified by the local planning authority during the process of decision-making or through the plan-making process.
- 2.7 Annex 2 also defines *Archaeological Interest* as a heritage asset which holds or potentially could hold 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.

- 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* 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

- 2.14 The relevant Strategic Development Plan framework is provided by the 2016 London Plan Consolidated with Alterations Since 2011. Policy relevant to archaeology in this document includes the following:

POLICY 7.8 HERITAGE ASSETS AND ARCHAEOLOGY

STRATEGIC

A. LONDON'S HERITAGE ASSETS AND HISTORIC ENVIRONMENT, INCLUDING LISTED BUILDINGS, REGISTERED HISTORIC PARKS AND GARDENS AND OTHER NATURAL AND HISTORIC LANDSCAPES, CONSERVATION AREAS, WORLD HERITAGE SITES, REGISTERED BATTLEFIELDS, SCHEDULED MONUMENTS, ARCHAEOLOGICAL REMAINS AND MEMORIALS SHOULD BE IDENTIFIED, SO THAT THE DESIRABILITY OF SUSTAINING AND ENHANCING THEIR SIGNIFICANCE AND OF UTILISING THEIR POSITIVE ROLE IN PLACE SHAPING CAN BE TAKEN INTO ACCOUNT.

B. DEVELOPMENT SHOULD INCORPORATE MEASURES THAT IDENTIFY, RECORD, INTERPRET, PROTECT AND, WHERE APPROPRIATE, PRESENT THE SITE'S ARCHAEOLOGY.

PLANNING DECISIONS

C. DEVELOPMENT SHOULD IDENTIFY, VALUE, CONSERVE, RESTORE, RE-USE AND INCORPORATE HERITAGE ASSETS, WHERE APPROPRIATE.

D. DEVELOPMENT AFFECTING HERITAGE ASSETS AND THEIR SETTINGS SHOULD CONSERVE THEIR SIGNIFICANCE, BY BEING SYMPATHETIC TO THEIR FORM, SCALE, MATERIALS AND ARCHITECTURAL DETAIL.

E. NEW DEVELOPMENT SHOULD MAKE PROVISION FOR THE PROTECTION OF ARCHAEOLOGICAL RESOURCES, LANDSCAPES AND SIGNIFICANT MEMORIALS. THE PHYSICAL ASSETS SHOULD, WHERE POSSIBLE, BE MADE AVAILABLE TO THE PUBLIC ON-SITE. WHERE THE ARCHAEOLOGICAL ASSET OR MEMORIAL CANNOT BE PRESERVED OR MANAGED ON-SITE, PROVISION MUST BE MADE FOR THE INVESTIGATION, UNDERSTANDING, RECORDING, DISSEMINATION AND ARCHIVING OF THAT ASSET.

LDF PREPARATION

F. BOROUGHES SHOULD, IN LDF POLICIES, SEEK TO MAINTAIN AND ENHANCE THE CONTRIBUTION OF BUILT, LANDSCAPED AND BURIED HERITAGE TO LONDON'S ENVIRONMENTAL QUALITY, CULTURAL IDENTITY AND ECONOMY AS PART OF MANAGING LONDON'S ABILITY TO ACCOMMODATE CHANGE AND REGENERATION.

G. BOROUGHES, IN CONSULTATION WITH ENGLISH HERITAGE, NATURAL ENGLAND AND OTHER RELEVANT STATUTORY ORGANISATIONS, SHOULD INCLUDE APPROPRIATE POLICIES IN THEIR LDFS FOR IDENTIFYING, PROTECTING, ENHANCING AND IMPROVING ACCESS TO THE HISTORIC ENVIRONMENT AND HERITAGE ASSETS AND THEIR SETTINGS WHERE APPROPRIATE, AND TO ARCHAEOLOGICAL ASSETS, MEMORIALS AND HISTORIC AND NATURAL LANDSCAPE CHARACTER WITHIN THEIR AREA.

2.15 A new London Plan has been prepared in draft and is due for adoption during 2021. Within the 2019 Intend to Publish version of the Plan, which was issued to the Secretary of State 24 December 2020, Chapter 7 'Heritage and Culture' contains relevant draft policies HC1 to HC7. Of particular relevance to sites containing non-designated heritage assets is draft policy HC1 as follows:

HC1 Heritage and Conservation 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 sustain 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 set out strategies for their repair and re-use.

Local Planning Policy

- 2.15 The relevant Development Plan framework is provided by the Royal Borough of Greenwich Local Development Framework. The Royal Greenwich Core Strategy with Detailed Policies was adopted July 2014, and contains the following policies which provides a framework for the consideration of development proposals affecting archaeological and heritage assets:

POLICY DH1 DESIGN

ALL DEVELOPMENTS ARE REQUIRED TO BE OF A HIGH QUALITY OF DESIGN AND TO DEMONSTRATE THAT THEY POSITIVELY CONTRIBUTE TO THE IMPROVEMENT OF BOTH THE BUILT AND NATURAL ENVIRONMENTS. TO ACHIEVE A HIGH QUALITY OF DESIGN, ALL DEVELOPMENTS ARE EXPECTED TO:

I. PROVIDE A POSITIVE RELATIONSHIP BETWEEN THE PROPOSED AND EXISTING URBAN CONTEXT BY TAKING ACCOUNT OF:

TOPOGRAPHY, LANDSCAPE SETTING, RIDGES AND NATURAL FEATURES;

EXISTING TOWNSCAPES, LOCAL LANDMARKS, VIEWS AND SKYLINES;

THE ARCHITECTURE OF SURROUNDING BUILDINGS;

THE NEED TO RETAIN TREES IN LINE WITH POLICY OS(F) AND POLICY OS(G); THE QUALITY AND NATURE OF MATERIALS, BOTH TRADITIONAL AND MODERN;

ESTABLISHED LAYOUT AND SPATIAL CHARACTER;

THE SCALE, HEIGHT, BULK AND MASSING OF THE ADJACENT TOWNSCAPE;

ARCHITECTURAL, HISTORICAL AND ARCHAEOLOGICAL FEATURES AND THEIR SETTINGS;

THE EFFECTIVE USE OF LAND;

THE POTENTIAL FOR A MIX OF USES;

PATTERNS OF ACTIVITY, MOVEMENT AND CIRCULATION PARTICULARLY FOR PEDESTRIANS AND CYCLISTS;

THE CULTURAL DIVERSITY OF THE AREA; AND ACCEPTABLE NOISE INSULATION AND ATTENUATION;

II. PROMOTE LOCAL DISTINCTIVENESS BY PROVIDING A SITE-SPECIFIC DESIGN SOLUTION;

- III. DEMONSTRATE THAT THE DEVELOPMENT CONTRIBUTES TO A SAFE AND SECURE ENVIRONMENT FOR USERS AND THE PUBLIC (SEE POLICY CH1);
- IV. ACHIEVE ACCESSIBLE AND INCLUSIVE ENVIRONMENTS FOR ALL, INCLUDING DISABLED PEOPLE;
- V. CREATE ATTRACTIVE, MANAGEABLE WELL-FUNCTIONING SPACES WITHIN THE SITE;
- VI. MAXIMISE ENERGY CONSERVATION, THROUGH EFFECTIVE LAYOUT, ORIENTATION, USE OF APPROPRIATE MATERIALS, DETAILING AND LANDSCAPE DESIGN (ALSO SEE POLICY E1);
- VII. BENEFIT ROYAL GREENWICH BY HELPING MITIGATE AND ADAPT TO CLIMATE CHANGE;
- VIII. ENHANCE BIODIVERSITY CONSISTENT WITH THE GREENWICH BIODIVERSITY ACTION PLAN;
- IX. INCORPORATE LIVING ROOFS AND/OR WALLS IN LINE WITH POLICY E(F);
- X. DEMONSTRATE ON-SITE WASTE MANAGEMENT INCLUDING EVIDENCE OF WASTE REDUCTION, USE OF RECYCLED MATERIALS AND DEDICATED RECYCLABLE WASTE STORAGE SPACE;
- XI. DEMONSTRATE WATER EFFICIENCY AND DEMAND MANAGEMENT MEASURES;
- XII. WHEREVER POSSIBLE, ENSURE BUILDING MATERIALS ARE RESPONSIBLY SOURCED AND MINIMISE ENVIRONMENTAL IMPACT;
- XIII. DEMONSTRATE MEASURES THAT REDUCE SURFACE WATER FLOOD RISK AND LANDSCAPE THE ENVIRONMENT IN A WAY THAT PROVIDES FOR PERMEABLE SURFACES;
- XIV. MEET THE REQUIREMENTS OF POLICY H5 FOR RESIDENTIAL SCHEMES;
- XV. INTEGRATE WITH EXISTING PATH AND CIRCULATION NETWORKS AND PATTERNS OF ACTIVITY PARTICULARLY FOR PEDESTRIANS AND CYCLISTS; AND
- XVI. FOR NON-RESIDENTIAL BUILDINGS IN MAJOR DEVELOPMENTS, ACHIEVE A BREEAM RATING OF 'EXCELLENT.'

POLICY DH3 HERITAGE ASSETS

THE ROYAL BOROUGH WILL PROTECT AND ENHANCE THE HERITAGE ASSETS AND SETTINGS OF ROYAL GREENWICH, INCLUDING THE MARITIME GREENWICH WORLD HERITAGE SITE, PRESERVING OR ENHANCING THE CHARACTER OR APPEARANCE OF THE 20 CONSERVATION AREAS, APPLYING A PRESUMPTION IN FAVOUR OF THE PRESERVATION OF STATUTORY LISTED BUILDINGS AND THEIR SETTINGS, GIVING SUBSTANTIAL WEIGHT TO PROTECTING AND CONSERVING LOCALLY LISTED BUILDINGS, PROTECTING THE THREE REGISTERED PARKS AND GARDENS, AS WELL AS ROYAL GREENWICH'S ARCHAEOLOGICAL REMAINS AND AREAS OF SPECIAL CHARACTER.

- 2.18 In terms of relevant designated heritage assets, as defined above and as shown on Figure 2, no nationally designated World Heritage Sites, Historic Battlefield or Historic Wreck sites lie within the immediate vicinity of the study site.
- 2.19 The bulk of Eltham Palace and associated grounds comprise a nationally significant designated Scheduled Monument. The area of proposed development lies to the east of the eastern boundary of the Scheduled designation.
- 2.20 In terms of relevant local designations, the study site lies within an Area of High Archaeological Potential as designated by the Royal Borough of Greenwich.
- 2.21 In line with relevant planning policy and guidance, this desk-based assessment seeks to clarify the study site's archaeological potential, together with the likely significance of that potential, and the need or otherwise for additional mitigation measures.
- 2.22 Above ground heritage issues including the setting of the Scheduled Monument in relation to the proposed development have been considered in documentation prepared by RPS.

3 GEOLOGY AND TOPOGRAPHY

Geology

- 3.1 The solid geology of the study site is shown by the Institute of Geological Sciences (IGS 1979) as London Clay deposits forming the London Basin.
- 3.2 Further detail is provided by British Geological Survey Sheet 271 (Dartford: 1998) which shows the study site to be underlain by deposits of Lambeth Group, Woolwich and Reading beds, defined as 'sand and clay, locally shelly, and flint pebble beds', overlying the London Clay.
- 3.3 Archaeological work undertaken within the immediate vicinity of the area of proposed development confirmed a general sequence of deposits comprising a natural light brown to yellow clay often directly overlain by modern made ground, a mixture of compact gravely rubble, concrete and Type 1 crushed stone. In some areas there was an intermediate band of mid greyish brown to dark grey clayey silt with occasional pebbles, c.200mm to 300mm thick. This may represent the truncated remnant of the original subsoil/ upper horizon of weathered natural (Compass Archaeology 2015, see also Section 4 below and Figure 18).

Topography

- 3.4 The area of the proposed development is generally level at 59.9-60.4m AOD.
- 3.5 No naturally occurring watercourses or standing bodies of water are present within the immediate vicinity of the study site.
- 3.6 The moat associated with Eltham Palace wraps around the eastern and southern parts of the principal building complex, west and northwest of the area of proposed development (see Figure 2).

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 -	1,800 BC
Bronze Age	1,800 -	600 BC
Iron Age	600 -	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 general area, and, in accordance with NPPF, considers the potential for any as yet to be discovered archaeological evidence on the study site.
- 4.2 What follows comprises a review of known archaeological assets within a 400m radius of the study site, also referred to as the study area, held on the Greater London Historic Environment Record (GLHER), together with a historic map regression exercise charting the development of the study area from the eighteenth century onwards until the present day.
- 4.3 Figure 2 spatially summarises relevant cultural heritage designations and archaeological findspot references in relation to the study site.
- 4.4 In terms of relevant designated heritage assets, the study site does not lie within the vicinity of a World Heritage Site, Historic Battlefield or Historic Wreck.
- 4.5 The bulk of Eltham Palace and its associated grounds comprise a nationally significant designated Scheduled Monument (SM list entry ref 1014833, TQ42445 73978). The area of proposed development lies to the east of the eastern boundary of the Scheduled designation.
- 4.6 In terms of relevant local designations, the study site lies within the Eltham Palace Archaeological Priority Area/Area of High Archaeological Priority (GLHER ref DLO13322, TQ4244 7400), as defined by

the Royal Borough of Greenwich and their archaeological advisors at the Greater London Archaeological Advisory Service (GLAAS).

- 4.7 The bulk of the GLHER entries within the study area search radius relate to the development, occupation and use of Eltham Palace, from the Medieval period onwards, together with the results of archaeological works undertaken within the Palace grounds.
- 4.8 Chapter 5 subsequently considers the site conditions and whether the proposed development will impact the theoretical archaeological potential identified below.
- 4.9 Above ground heritage issues including the setting of the Scheduled Monument in relation to the proposed development have been considered in documentation prepared by RPS.

Previous Archaeological Work

- 4.10 Programmes of archaeological evaluation and monitoring have been undertaken within the Eltham Palace study site, around the visitors centre including the immediate vicinity of the proposed development area, as shown on Figure 18.
- 4.11 Archaeological monitoring undertaken during 2014-2015 within the area of the visitor centre facility including the area of proposed development revealed comprehensive truncation as a result of previous development, interpreted as the works undertaken during the 1990s. The only feature of note was a pit containing cow bones, thought to date to the 1930s (Compass Archaeology 2015: Area D section 6.2.5; see also paragraph 3.3 above).
- 4.12 To the north and west, archaeological evaluation identified later prehistoric remains together with Post Medieval and Modern remains (ELO3244, TQ4260 7385; Oxford Archaeology 1996).
- 4.13 To the south and east, archaeological monitoring of test pits around the existing carpark and the greenhouses revealed no archaeological finds or features, with natural geology noted at 0.4-0.45m below the existing ground surface (ELO13411, TQ42593 73923; Compass Archaeology 2013).
- 4.14 To the north of the proposed development area, archaeological monitoring in 2002 and 2003 during the excavation of new service trenches revealed Post Medieval and Modern remains. Natural geology was noted at 59.5m AOD (ELO19759, TQ4251 7400).
- 4.15 In addition to the above, previous phases of archaeological works undertaken during the 1950s and 1970s appear to have been focussed to the north and northwest of the area of proposed development, associated with the principal Eltham Palace building complex (DLO33356, TQ4278 7425; Woods 1982).

LiDAR

- 4.16 LiDAR information for the Eltham Palace site is reproduced at Figures 20a-b. For this assessment, 0.5m resolution Environment Agency LiDAR data was sourced; the survey was flown in March 2014. Both DSM and DTM data were obtained and processed using a combination of simple Local Relief Modelling, Openness Positive and multi-directional Hillshading techniques. The LiDAR DSM shows the impact of modern landscaping within the area of the visitors centre.

Prehistoric

- 4.17 No archaeological finds or features of early prehistoric date are identified on the GLHER within the study area search radius; no discoveries of these dates are recorded from the archaeological works undertaken to date within the Palace grounds (DLO33356, TQ4278 7425; see paragraphs 4.10-4.15 above).
- 4.18 From around 4000 BC the mobile hunter-gathering economy of the Mesolithic gradually gave way to a more settled agriculture-based subsistence. The pace of woodland clearance to create arable and pasture-based agricultural land varied regionally and locally, depending on a wide variety of climatic, topographic, social and other factors. The trend was one of a slow, but gradually increasing pace of forest clearance.
- 4.19 The sole find of later prehistoric date recorded on the GLHER within the study area search radius comprises an east-west ditch, containing burnt and struck flint dated to the Bronze Age, and interpreted as forming the southern exterior edge of either a field or enclosure boundary, identified during archaeological evaluation to the north, east and southwest of the proposed development area, east of the Palace (MLO74, TQ4261 7399; ELO3244, TQ4260 7385; Oxford Archaeology 1996).
- 4.20 Archaeological monitoring undertaken during 2014-2015 within the area of the visitor centre facility including the area of proposed development revealed comprehensive truncation as a result of previous development, with no prehistoric material identified (Compass Archaeology 2015: Area D section 6.2.5).
- 4.21 In view of the above, the study site is not considered likely to have an archaeological potential for the prehistoric periods.

Roman

- 4.22 No archaeological finds or features of Roman date are identified on the GLHER within the study area search radius; no discoveries of these dates are recorded from the archaeological works undertaken to date within the Palace grounds (DLO33356, TQ4278 7425; see also paragraphs 4.10-4.15 above).
- 4.23 In view of the above, a generally low archaeological potential can be identified for the Roman period at the study site itself.

Anglo-Saxon/Early Medieval

- 4.24 A manor is noted at Eltham on Domesday, 'Alteham', formerly held by Alwold, subsequently by Haimo, Sheriff of Kent for Bishop Odo, and in 1088 by the Earl of Gloucester. Archaeological work to the northwest of the study site during the 1970s revealed remains which possibly date to the 11th Century (MLO14555, TQ4241 7399).
- 4.25 No archaeological finds or features of Anglo Saxon date are identified on the GLHER within the study area search radius; no discoveries of Anglo Saxon or Early Medieval date are recorded from the archaeological works undertaken within the immediate vicinity of the area of proposed development (DLO33356, TQ4278 7425; see paragraphs 4.10-4.15 above).

- 4.26 In view of the above, the study site is not considered likely to have an archaeological potential for the Anglo-Saxon or Early Medieval periods.

Medieval

- 4.27 The documented history states that the area now occupied by Eltham Palace was initially held by Haimo (sheriff of Kent) on behalf of Odo of Bayeux. In 1088 it passed to the Earl of Gloucester, to the De Clare family from 1216, to John de Veci in 1278, and to the Bishop of Durham in 1295. The Bishop is understood to have constructed the first stone buildings on the site of Eltham Palace, in the late 11th – early 12th centuries. In 1305 the site passed to Edward II, following which extensive reconstruction works took place. In 1479-1482 the Great Hall, stone moat bridge, and lodgings were built; subsequently both Henry VII and Henry VIII are known to have added buildings. Archaeological excavations undertaken at the palace site during the 1970s, primarily to the northwest of the area of proposed development, uncovered a timber building of late 11th century date, together with two further phases dated to the late 12th and early 13th centuries, all sealed by a mid-late 13th century cultivation soil (Cherry & Pevsner 1999; English Heritage 2011; Woods 1982; GLHER ref DLO13322, TQ4244 7400; MLO101008, TQ4246 7394; MLO55882, TQ4240 7403; MLO14741, TQ4241 7399; ELO5113, TQ4241 7399).
- 4.28 The site of a jousting tiltyard has been established to the east of the main house and moat, north of the existing visitor's centre, via the interpretation of a brick wall noted during archaeological evaluation in 1996 (MLO74261, TQ4260 7399).
- 4.29 Medieval remains have also been identified beyond the current Palace boundary at 32 Courtyard, northwest of the study site (MLO74, TQ4248 7410, TQ4248 7411; ELO1330, TQ425 742; ELO213, TQ4248 7411; Oxford Archaeological Unit 1999).
- 4.30 Archaeological monitoring undertaken during 2014-2015 within the area of the visitor centre facility including the area of proposed development revealed comprehensive truncation as a result of previous development, with no Medieval material identified (Compass Archaeology 2015: Area D section 6.2.5).
- 4.31 In view of the above, the study site is not considered likely to have an archaeological potential for the Medieval period.

Post Medieval & Modern (including map regression exercise)

- 4.32 By the sixteenth century, Eltham Palace was primarily in use as a hunting lodge, and during the Commonwealth (1649-1660), many former palace buildings were demolished (Cherry & Pevsner 1999; English Heritage 2011; English Heritage 2013).
- 4.33 John Rocque's map of 1745 (Figure 3) shows the site of Eltham Palace labelled as 'King John's Court'. The area of proposed development lay in an area of open land at this time, east of the palace core. Further small scale maps show the area of proposed development to lie in open land (Figure 4: 1769 Andrews & Dury Map of Kent; Figure 5: 1799 Ordnance Survey Drawing).

4.34 By the early nineteenth century the palace site was occupied by farm buildings, and the hall was in use as a barn (Cherry & Pevsner 1999; English Heritage 2011; English Heritage 2013). An estate map dated 1806 (Figure 6) shows the study site lying at the boundary of an area of orchard and garden.

4.35 The Eltham Tithe Map (Figure 7: 1844) and the associated award show the area of proposed development remaining in open land, with the following land use:

reference	Landowner	Occupier	Description	cultivation
884	Organisation: Her Majesty	Richard Mills	Meadow and archery ground pond and island	meadow, ponds and island

4.36 The First Edition Ordnance Survey (Figure 8: 1863-4) shows the study site lying within a small area of woodland to the south of an access route. The Second Edition Ordnance Survey (Figure 9: 1896-7) shows a small rectangular building immediately northwest of the study site.

4.37 Repairs to the former palace buildings, including the rebuilding of the roof of the great hall, were undertaken 1911-1914 (Cherry & Pevsner 1999; English Heritage 2011; English Heritage 2013). The Third Edition Ordnance Survey (Figure 10: 1916) shows no significant changes within the study site from the previous edition.

4.38 Sir Stephen Courtauld created the existing Eltham Palace 1933-7, with the new house additions designed by Seeley and Paget. At this time part of the moat was restored and the gardens remodelled (Cherry & Pevsner 1999; English Heritage 2011; English Heritage 2013; MLO101008, TQ4246 7394; MLO83207, TQ42425 74001). The 1930s Ordnance Survey (Fig 11) shows no changes within the study site.

4.39 Aerial photographs dated 1949 (Figures 12-13) shows the creation of the Courtaulds building, with the area of proposed development lying to the east in an area of open space and greenhouses.

4.40 The composite 1950-1956 Ordnance Survey (Figure 14) shows the study site lying immediately north of a line of greenhouses, within an access way. No substantial changes are shown within the area of proposed development on the composite 1971-1977 Ordnance Survey (Figure 15) although the configuration of the greenhouses has changed to the south.

4.41 An aerial photograph dated 1981 (Figure 16) shows the tennis courts and garden buildings within the vicinity of the study site, with a rectangular building to the north. No significant changes are shown within the study site on the composite 1989-1991 Ordnance Survey (Figure 17).

4.42 Archaeological monitoring in 1999 revealed traces of a path dated to the 1930s, southeast of the palace and moat (MLO75746, ELO245, TQ424 739).

4.43 Figure 18 reproduces the existing site survey, and shows the presence of the existing visitor centre. Archaeological monitoring works in association with the creation of the visitor centre revealed comprehensive truncation as a result of previous development, interpreted as the works undertaken during the 1990s. Remains dated to the 1930s were uncovered (Compass Archaeology 2015: Area D section 6.2.5; see also paragraph 3.3 above).

- 4.44 The archaeological potential of the area of proposed development for the Post Medieval and Modern periods can be identified as related to the layout of the existing visitor centre. The potential significance of archaeological remains of these dates has been identified as low (local).

Assessment of Significance (Designated Assets)

- 4.45 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.
- 4.46 As shown on Figure 2, in terms of relevant designated heritage assets, the study site does not lie within the vicinity of a World Heritage Site, Historic Battlefield or Historic Wreck.
- 4.47 While the bulk of the Eltham Palace site comprises a nationally significant designated Scheduled Monument. The area of proposed development lies to the east of the eastern boundary of the Scheduled designation.
- 4.48 Above ground heritage issues including the setting of the Scheduled Monument in relation to the proposed development have been considered in additional documentation prepared by RPS.

Assessment of Significance (Non-Designated Assets)

- 4.49 In terms of relevant local designations, the study site lies within the Eltham Palace Area of High Archaeological Priority Potential, as defined by the Royal Borough of Greenwich and their archaeological advisors at the Greater London Archaeological Advisory Service (GLAAS).
- 4.50 As identified by desk based work, archaeological potential by period and the likely significance of any archaeological remains which may be present is summarised in table form below:

Period:	Identified Archaeological Potential	Identified Archaeological Significance
Palaeolithic	Low/nil	Low (Local)
Mesolithic	Low/nil	Low (Local)
Neolithic	Low/nil	Low (Local)
Bronze Age	Low/nil	Low (Local)
Iron Age	Low/nil	Low (Local)
Roman	Low/nil	Low (Local)
Anglo-Saxon	Low/nil	Low (Local)
Medieval	Low/nil	Low (Local)
Post Medieval	Low/nil	Low (Local)
Modern	High	Low (Local)

- 4.51 The available information indicates that the nationally significant remains of Medieval, Post Medieval and Modern date, associated with Eltham Palace, are focussed to the west of the proposed development area, and are not believed to extend into the area of proposed development.

- 4.52 Any archaeological remains, should they occur within the proposed development area, would in the context of the Secretary of State's non-statutory criteria for Scheduled Monuments (DCMS 2013) most likely be of local significance.

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

Site Conditions

- 5.1 The extant buildings of Eltham Palace date from the later Medieval period, with subsequent additions and alterations, in particular those from the 1930s associated with the Courtauld family.
- 5.2 The area of proposed development lies within the existing visitor centre facilities, and has already been subject to archaeological monitoring, revealing nothing of significance (see Section 4 above; Compass Archaeology 2015: Area D section 6.2.5; see also Figures 18-19).

Proposed Development

- 5.3 Redevelopment proposals within the Eltham Palace site comprise the creation of a ramp to access the existing visitor centre, as shown in plan form at Figure 21.

Review of Potential Development Impacts on Designated Archaeological Assets

- 5.4 In terms of relevant designated heritage assets, as defined above and as shown on Figure 2, no nationally designated World Heritage Sites, Historic Battlefield or Historic Wreck sites lie within the vicinity of the study site.
- 5.5 The bulk of the Eltham Palace site including its associated grounds comprise a nationally significant designated Scheduled Monument.
- 5.6 The area of proposed development lies to the east of the eastern boundary of the Scheduled designation. Above ground heritage issues, including the setting of the Scheduled Monument, in relation to the proposed development have been considered in documentation prepared by RPS.

Review of Potential Development Impacts on Non-Designated Assets

- 5.7 In terms of relevant local designations, the study site is located within an Area of High Archaeological Priority/Archaeological Priority Area, as defined by the London Borough of and GLAAS.
- 5.8 As defined above in Section 4, the available information indicates that the area of proposed development is considered likely to have had a low archaeological potential for the later prehistoric, Medieval, Post Medieval and Modern periods.
- 5.9 The area of proposed development has however been previously archaeologically monitored during the construction of the existing visitor centre facilities, when nothing of archaeological significance was observed (see Section 4 above; Compass Archaeology 2015: Area D section 6.2.5).
- 5.10 No further archaeological works are therefore envisaged in relation to the construction of the proposed ramp.

6 SUMMARY AND CONCLUSIONS

- 6.1 A study site within the Eltham Palace site, Court Yard, London SE9, has been assessed for its below ground archaeological potential.
- 6.2 In accordance with relevant government planning policy and guidance, a desk based assessment has been undertaken to clarify the archaeological potential of the study area.
- 6.3 In terms of relevant designated heritage assets, no World Heritage Sites, Historic Battlefield or Historic Wreck sites have been identified within the vicinity of the study site.
- 6.4 The bulk of Eltham Palace and associated grounds comprise a nationally significant designated Scheduled Monument.
- 6.5 In terms of relevant local designations, the study site lies within an Area of High Archaeological Potential, as defined by the Royal Borough of Greenwich and their archaeological advisors at GLAAS.
- 6.6 Past-post depositional impacts within the study site are considered likely to have had a negative archaeological impact. The area of the study site has previously been subject to archaeological monitoring, when nothing of archaeological significance was observed.
- 6.7 Proposals currently comprise the creation of a ramp to serve the existing visitor centre facilities.
- 6.8 No further archaeological mitigation measures are proposed in this particular instance.
- 6.9 The area of proposed development lies to the east of the eastern boundary of the Scheduled designation. Above ground heritage issues including the setting of the Scheduled Monument in relation to the proposed development area have been considered in additional documentation prepared by RPS.

Sources Consulted

General

English Heritage

Greater London Archaeological Advisory Service

Greater London Historic Environment Record

Internet

Archaeological Data Service: <http://archaeologydataservice.ac.uk>

Aerial photography: <http://www.britainfromabove.org.uk/>

British Geological Survey: <http://www.bgs.ac.uk/discoveringGeology/geologyOfBritain/viewer.html> British History: <http://www.british-history.ac.uk/>

Domesday Book: <https://opendomesday.org.uk>

Historic England: <https://www.historicengland.org.uk/listing/the-list>

Past Scape: <http://www.pastscape.org.uk>

Portable Antiquities Database: <https://finds.org.uk/database/>

NPPG: <http://planningguidance.planningportal.gov.uk>

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Cartographic

- 1745 John Rocque Map
- 1769 Andrews & Dury Map of Kent
- 1799 Ordnance Survey Drawing

1806 Estate Map

1844 Eltham Tithe Map

1863-4 Ordnance Survey

1896-7 Ordnance Survey

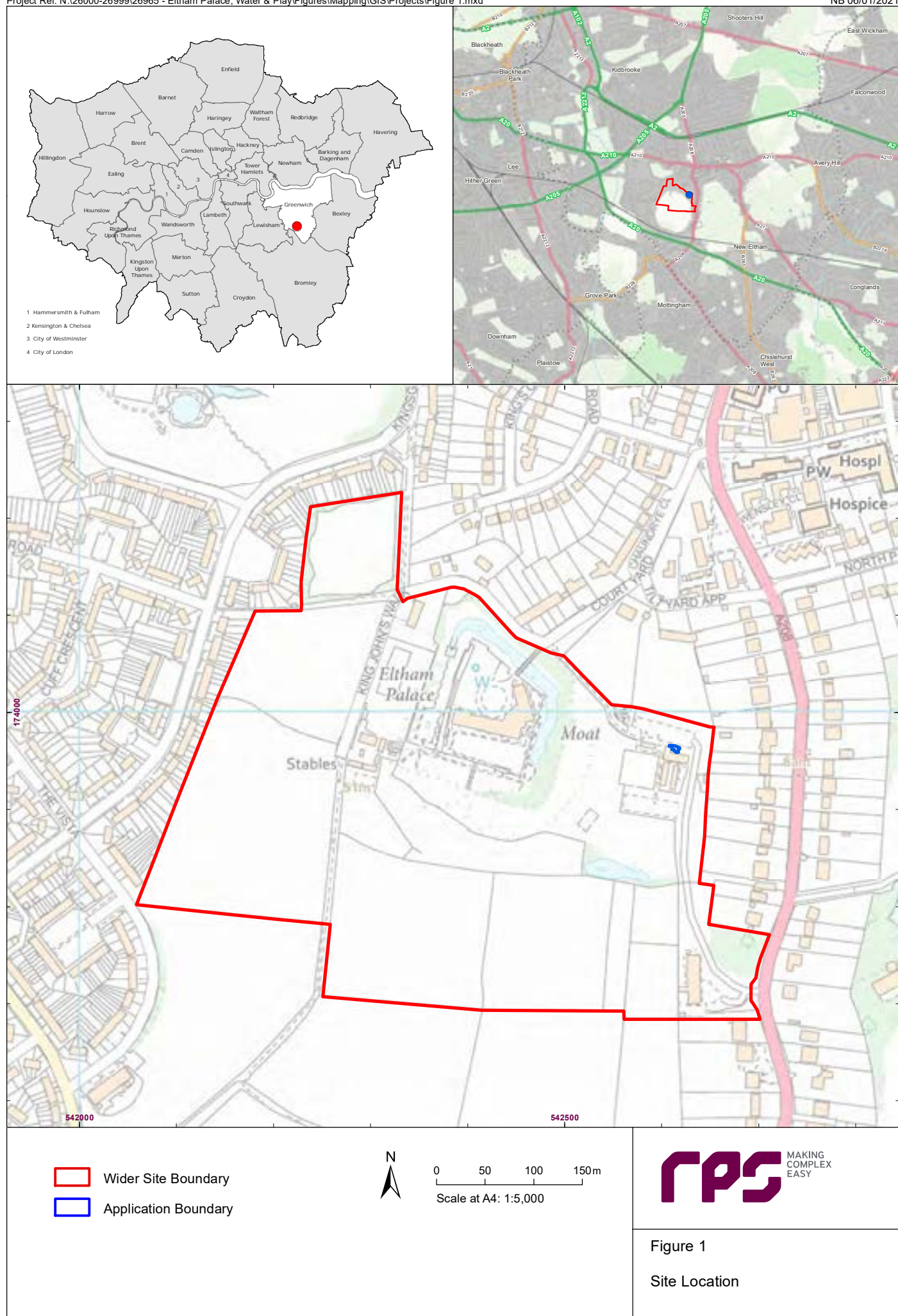
1916 Ordnance Survey

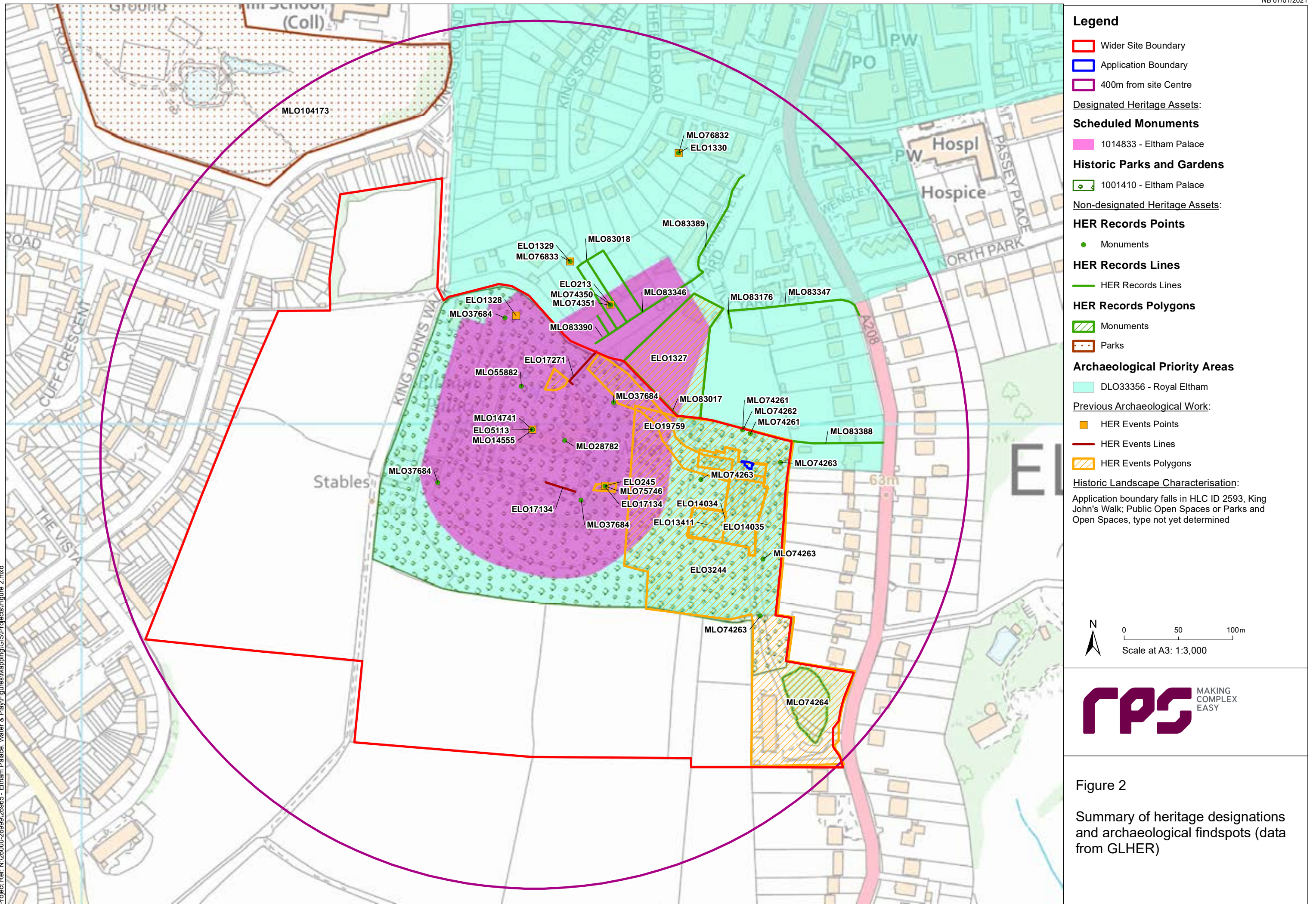
1950-1956 Ordnance Survey

1971-1977 Ordnance Survey

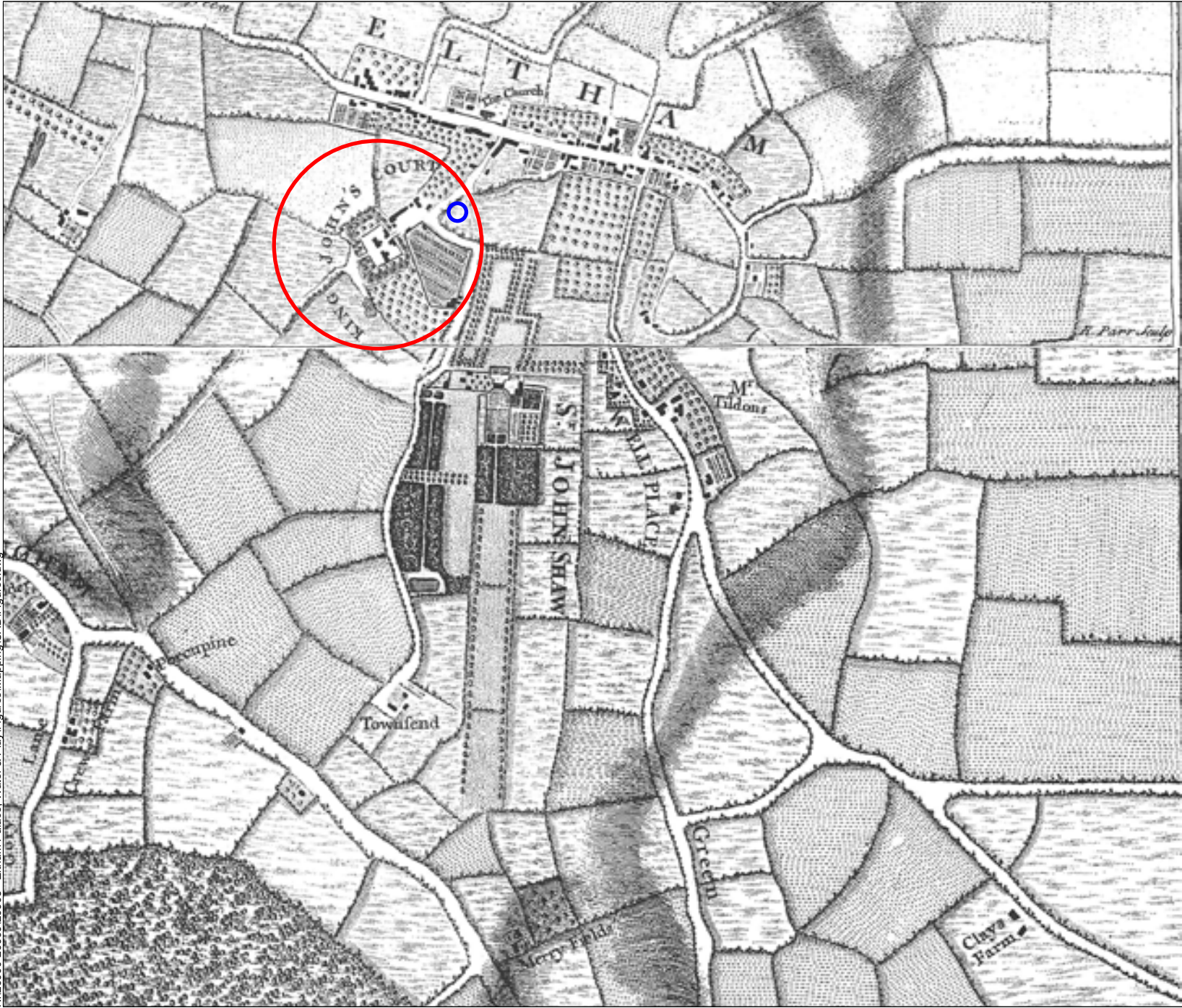
1989-1991 Ordnance Survey

1998 British Geological Survey Sheet 271 (Dartford)





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Wider Site Location
(approximate)



Application Site Location
(approximate)

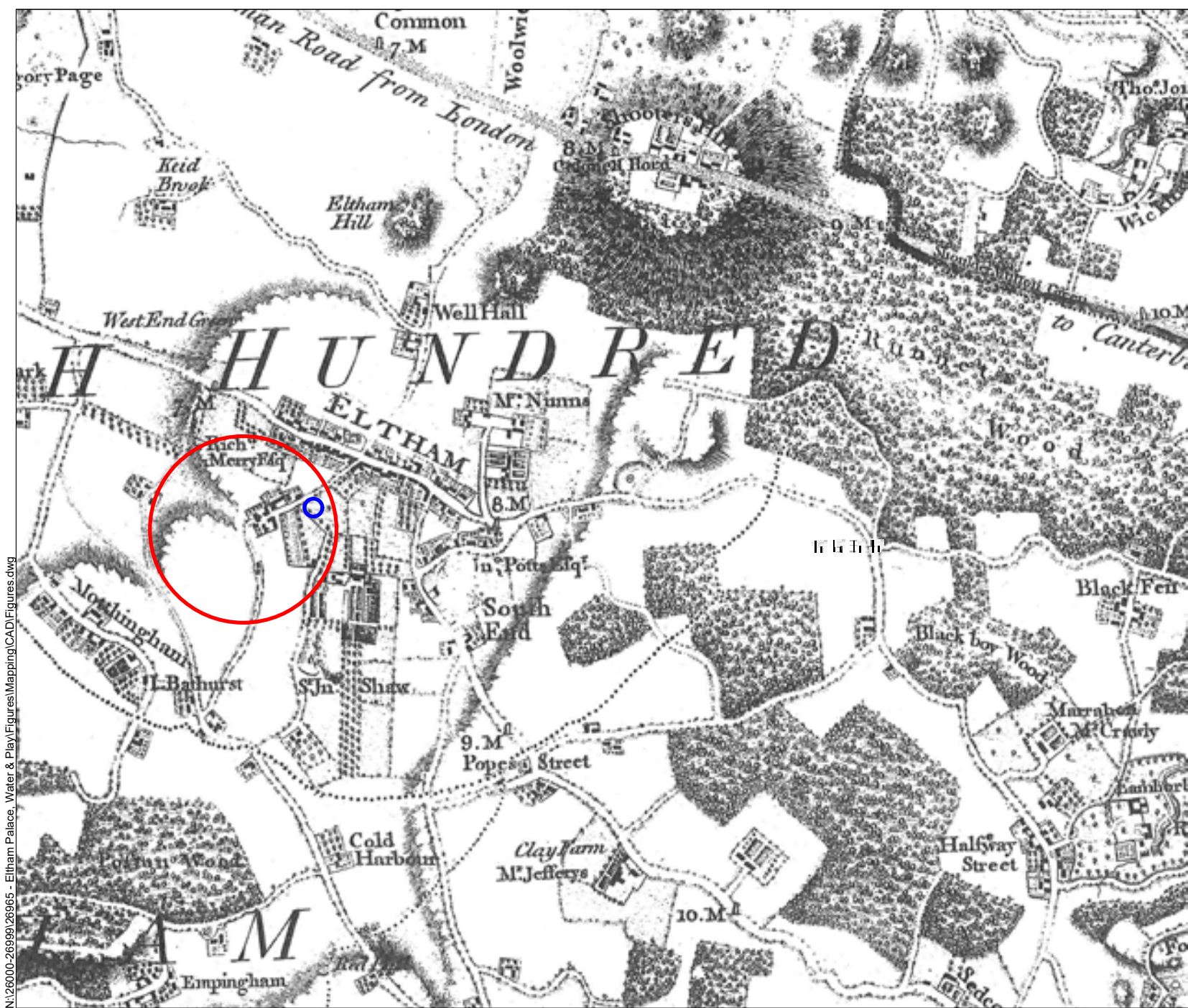


Not to Scale:
Illustrative Only



Figure 3

1745 John Rocque Map



Wider Site Location
(approximate)



Application Site Location
(approximate)



Not to Scale:
Illustrative Only



Figure 4

1769 Andrews & Dury Map of
Kent



Wider Site Location
(approximate)



Application Site Location
(approximate)





Not to Scale:
Illustrative Only



Figure 5

1799 Ordnance Survey Drawing



-  Site Boundary
-  Application Boundary

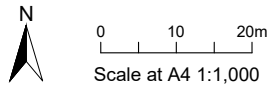




Figure 6
1806 Estate Map

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-  Application Boundary

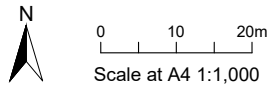


Figure 7
1844 Eltham Parish Tithe Map

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- Site Boundary
- Application Boundary

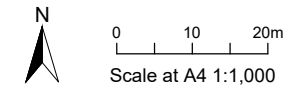
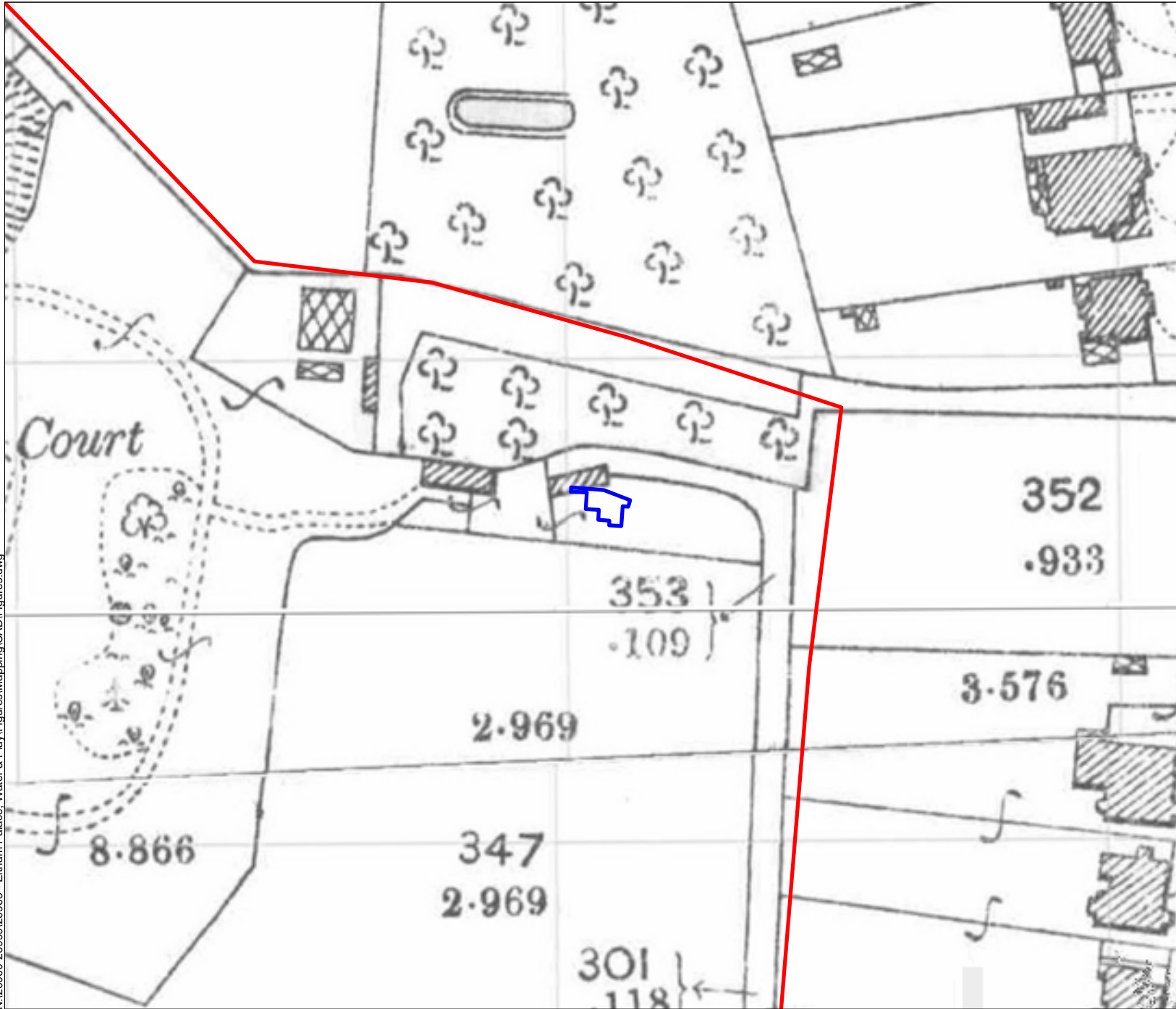


Figure 8
1863-1864 Ordnance Survey

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- Site Boundary
- Application Boundary

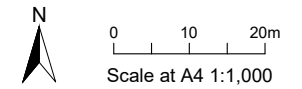
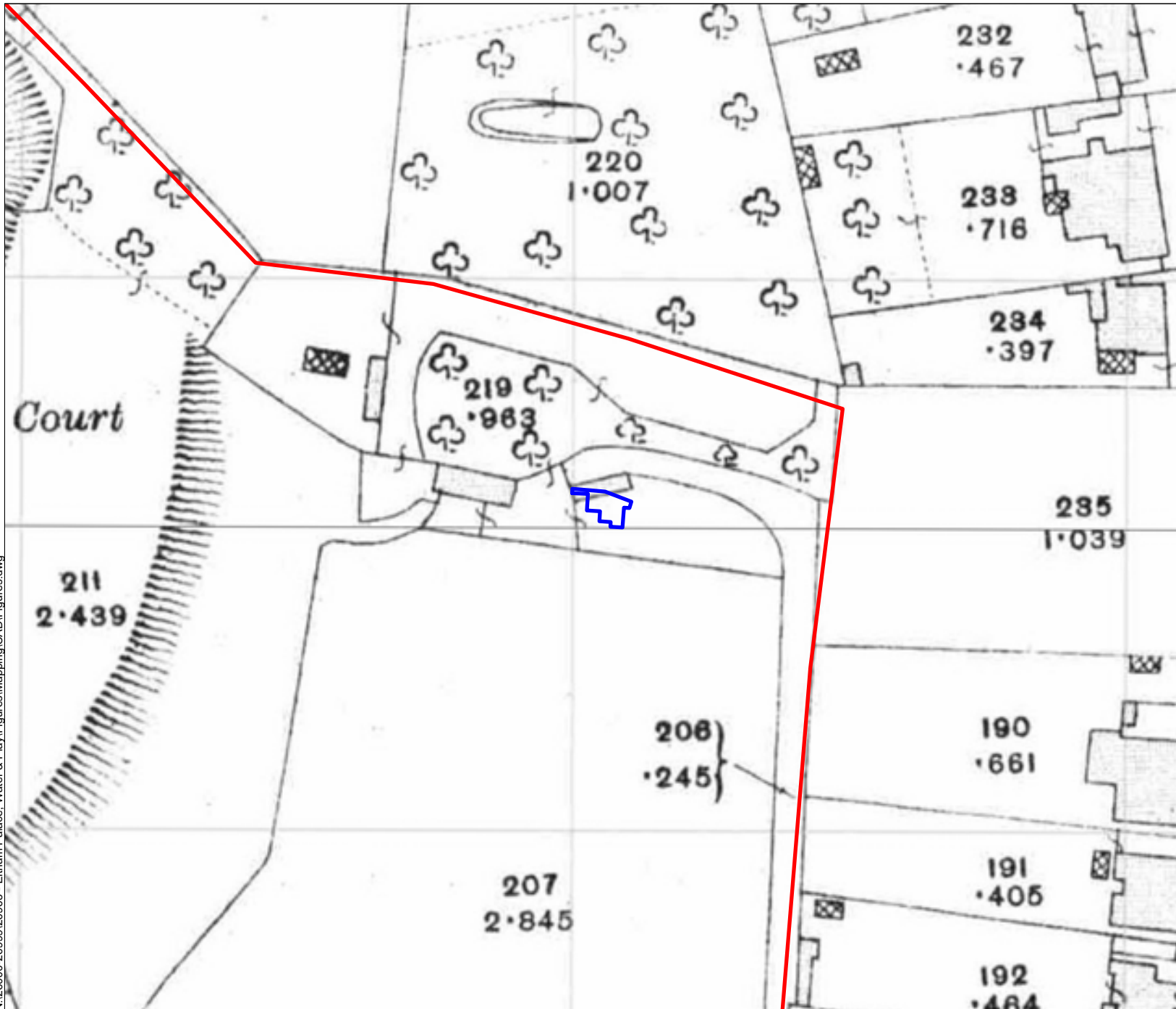


Figure 9
1896-1897 Ordnance Survey

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- Site Boundary
- Application Boundary

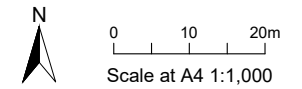




Figure 10
1916 Ordnance Survey

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-  Site Boundary
-  Application Boundary

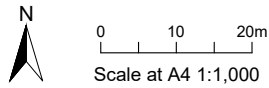


Figure 11
1931 Ordnance Survey

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Figure 12

1949 Aerial Photograph
(partial coverage)

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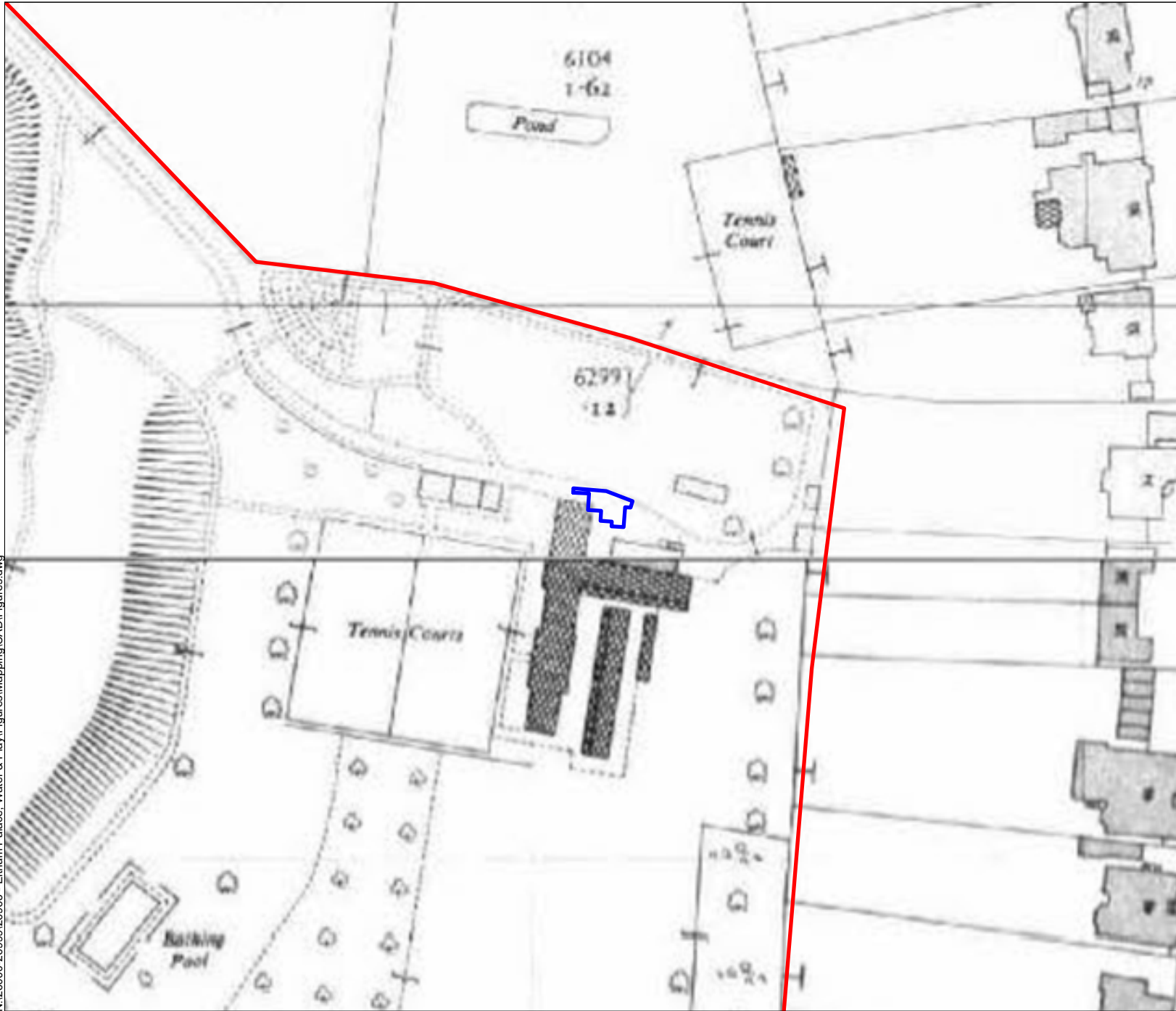


Not to Scale:
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Figure 13
1949 Aerial Photograph
(partial coverage)

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- Site Boundary
- Application Boundary

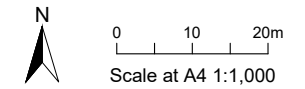
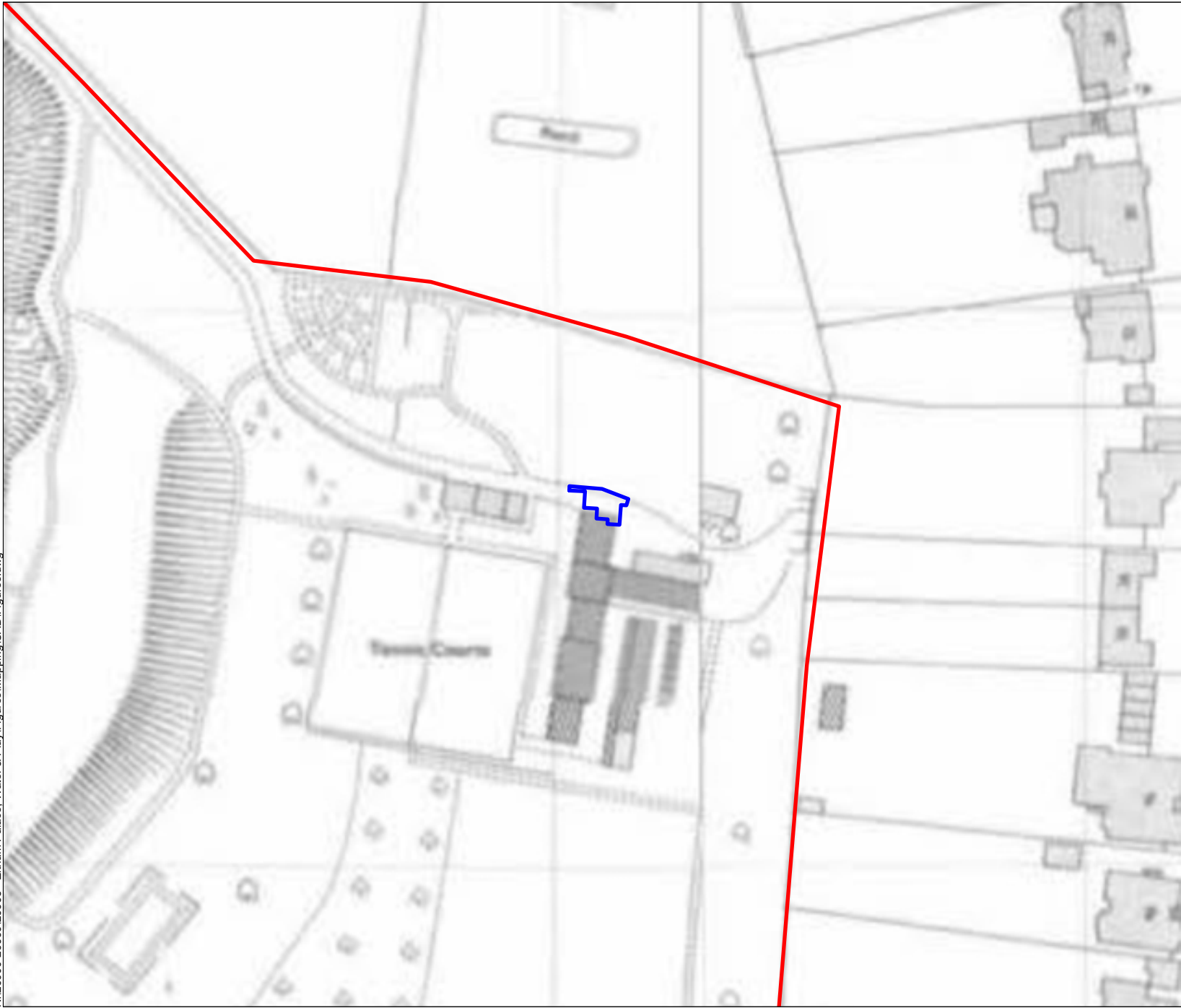




Figure 14
1950-1956 Ordnance Survey

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-  Site Boundary
-  Application Boundary

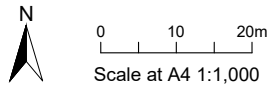


Figure 15
1971-1977 Ordnance Survey



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Illustrative Only



Figure 16

1981 Aerial Photograph
(partial coverage)

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- Site Boundary
- Application Boundary

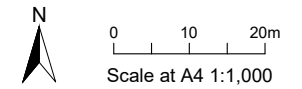
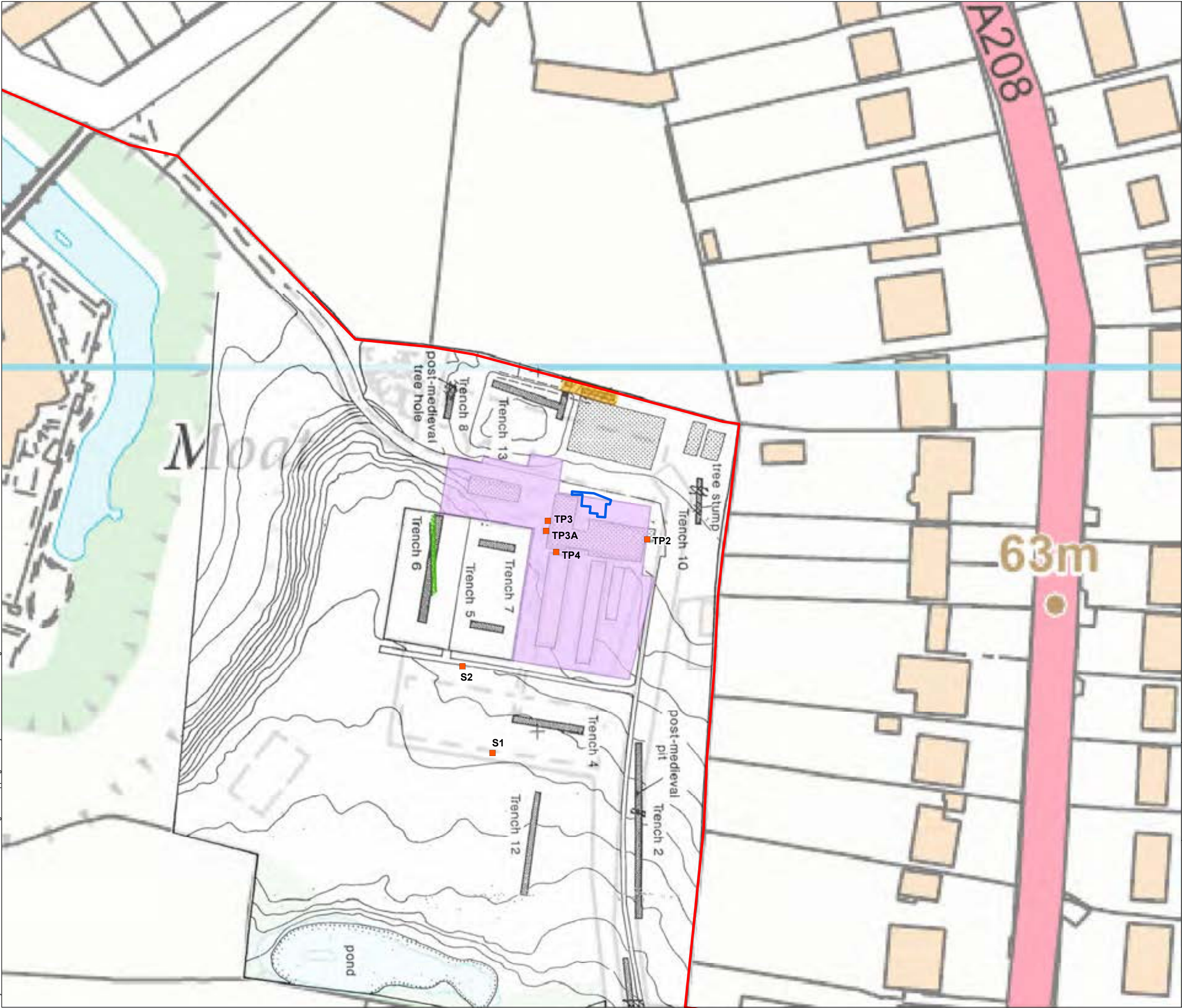


Figure 17
1989-91 Ordnance Survey



Legend

- Site Boundary
- Application Boundary
- 2015 Watching Brief Area (New Visitor's Centre)
- 2013 Trial Pits & Soakage
- 1996 Trench Location
- Features Identified during 1996*
- Bronze Age
- Post-medieval ditch

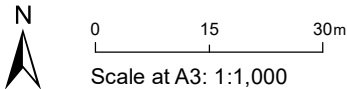
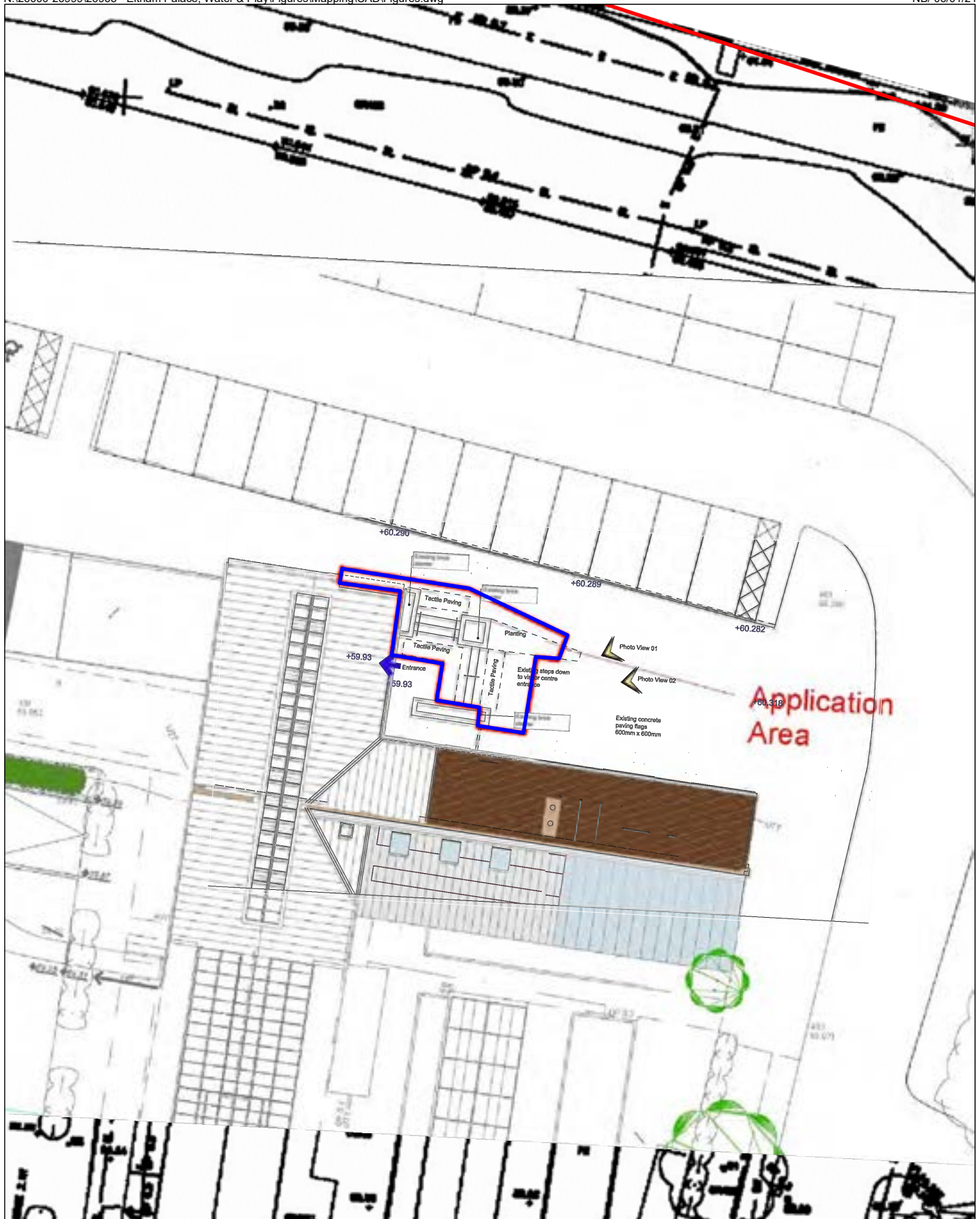


Figure 18
Previous Archaeological Works



- Wider Site Boundary
- Application Boundary



Not to Scale:
Illustrative Only



Figure 19

Existing Site Survey



Legend

- Site Boundary
- Application Boundary

LiDAR DATA

Source:
Environment Agency

Data Type: DTM

Resolution: 0.5m

Date Captured:
March 2014

Processing:
simple Local Relief Model overlaid on
Multi-direction Hillshade

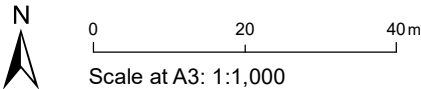


Figure 20a
LiDAR Data - DTM



Legend

- Site Boundary
- Application Boundary

LiDAR DATA

Source:
Environment Agency

Data Type: DSM

Resolution: 0.5m

Date Captured:
March 2014

Processing:
Openness Positive Model overlaid on
Multi-direction Hillshade

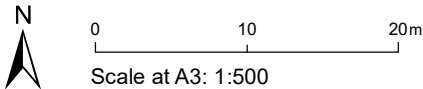
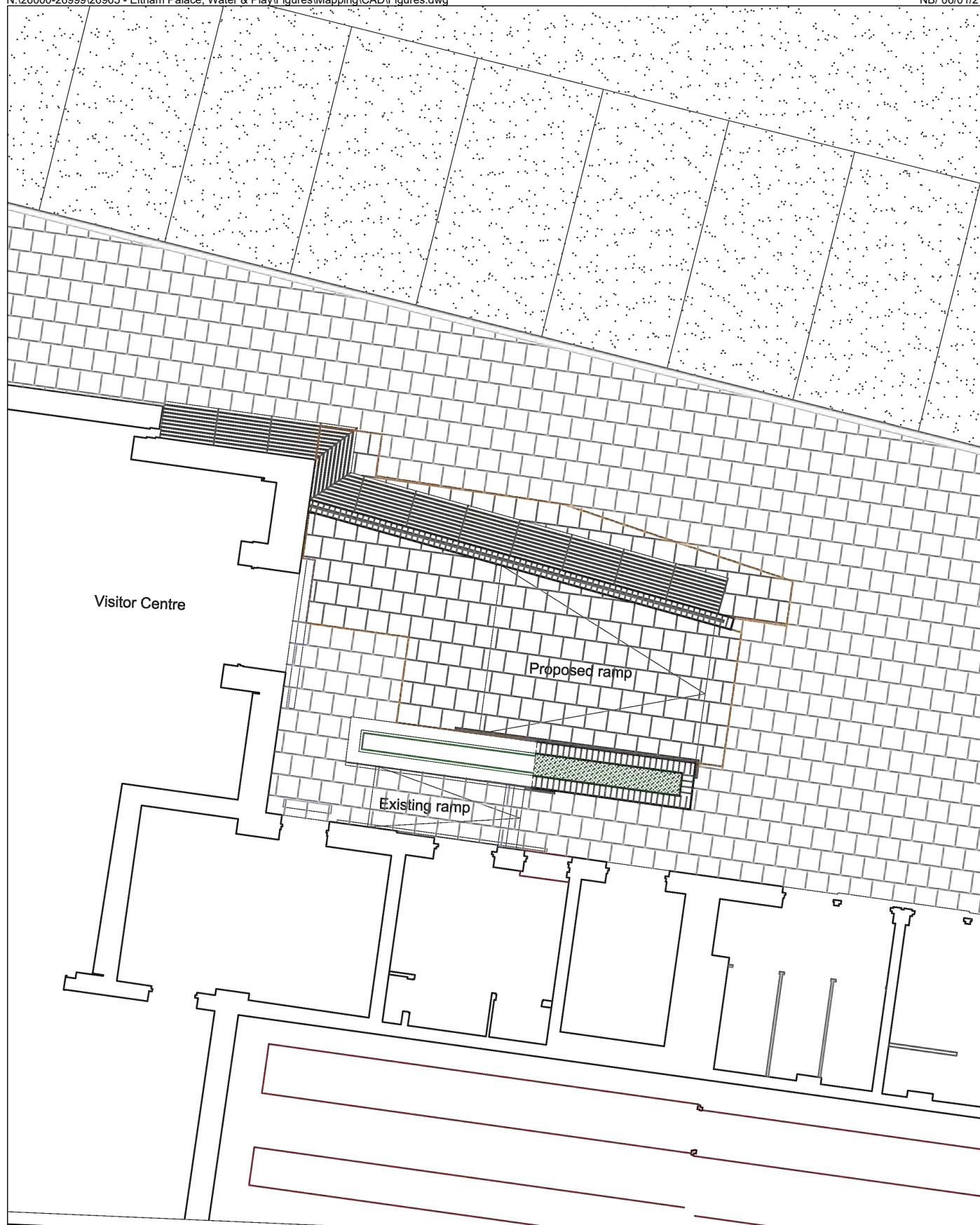


Figure 20b

LiDAR Data - DSM



Not to Scale:
Illustrative Only



Figure 21

Redevelopment Proposals:
Ramp



rpsgroup.com