

**Croydon Underpass,  
Croydon  
Heritage Statement**

Client: WILDSTONE PLANNING ON BEHALF  
OF CROYDON BOROUGH COUNCIL

AB Heritage Project No:60593

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GLHER Data Licence Number: 14519

## Croydon Underpass, Croydon Heritage Statement

**Client** Wildstone Planning on behalf of  
Croydon Borough Council

**Project Number** 60593

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## CONTENTS

1.	Introduction.....	4
1.1	Project Background .....	4
1.2	Site Location & Description.....	4
1.3	Proposed Development .....	4
2.	Aims & Methodology .....	5
2.1	Aims.....	5
2.2	Consultation.....	5
2.3	Data Collation .....	5
2.4	Assessment of the Cultural Heritage Resource .....	7
2.5	Impact Assessment Criteria.....	7
2.6	Limitations .....	8
3.	Cultural Heritage Resource Baseline .....	10
3.1	Known Cultural Heritage Assets .....	10
4.	Historic Development of Site .....	11
5.	Site Visit .....	14
5.2	Northern underpass portal .....	14
5.3	Southern underpass portal .....	16
6.	Heritage Review .....	18
6.1	Current Setting of the A212 - Wellesley Road / Park Lane.....	18
7.	Impact Assessment & Recommendations.....	19
7.1	Predicted Impact of Proposed Croydon Underpass Development.....	19
8.	Conclusion.....	21
9.	References.....	22
9.1	Documentary & Cartographic Sources .....	22
9.2	Online Sources .....	22
	Introduction.....	24
	Statutory Protection for Heritage Assets.....	24
	National Planning Policy .....	24
	Local Planning Policy.....	25

## FIGURES

Figure 1: Site Location Plan

Figure 2: Proposed Section & Elevation

Figure 3: Projected view of structure and planter from ground level

Figure 4: Projected view of structure and advertising from ground level

Figure 5: Proposed structure design

## PLATES

Plate 1: 1873 publication 25" OS map extract.....	11
Plate 2: 1913 25" OS map.....	12
Plate 3: 1955 25" OS map.....	12
Plate 4: Current layout of A212, proposed site locations outlined in red .....	13

## PHOTOS

Photo 1: Proposed site of northern planter, view from NW (A212 / Wellesley Road) .....	14
Photo 2: Proposed site of northern planter, view from north: former electricity offices on right of picture, Norfolk House tall building at extreme left .....	15
Photo 3: View towards northern underpass portal from junction of George Street and A212. ....	15
Photo 4: View of proposed site from the south (A212 / Park Lane).....	16
Photo 5: View to proposed site from the SW.....	16
Photo 6: View of proposed site from corner of A212 and George Street, looking south-east at Croydon College 17	

## APPENDICES

Appendix 1 Planning Policy .....	24
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## **1. INTRODUCTION**

### **1.1 Project Background**

- 1.1.1 AB Heritage Ltd (hereafter AB Heritage) has been commissioned by Wildstone Planning, on behalf of their client Croydon Borough Council, to produce a Heritage Statement to cover a proposed development at Croydon Underpass. This is in advance of a formal planning application.
- 1.1.2 The Croydon Draft Supplementary Planning Document paragraphs 1.4.14 - 15 recommends that where a proposal affects a heritage asset, these should be identified, and their significance understood, and for the design to respond to heritage receptors with the process outlined within a Heritage Statement.

### **1.2 Site Location & Description**

- 1.2.1 The proposed development site (hereafter ‘the site’) comprises the northern and southern access to the underpass, specifically the tops of the tunnel, located at the A212 Croydon Underpass, Croydon, CR0 1JA; centred upon National Grid Reference (NGR) TQ 32563 65613 (Figure 1).
- 1.2.2 The site is located relatively central to the Borough of Croydon. East Croydon station is located c. 260m to the east, while West Croydon station is located c. 560m to the north, with the High Street c. 250m to the west.
- 1.2.3 Croydon underpass is a c. 75m long tunnel, allowing through-traffic to move north-south along the A212 Wellesley Road / Park Lane. This allows for local traffic entering or exiting the east-west aligned George Street (which is split by the A212), or Park Street, to progress over the underpass.

### **1.3 Proposed Development**

- 1.3.1 The current design proposal is for two copper structures with a zinc coating on their upper surface, located over the northern and southern portals of the underpass. These will have provision for advertising facing out from the underpass, partially below ground level, facing traffic entering the respective entrances of the underpass (Figures 2 - 5).
- 1.3.2 The upper part of the structures, at pavement level, will incorporate a planter, intended to house local and indigenous flora (Figures 2, 3 & 5). These will replace existing planters. The zinc coating is intended to tie the appearance of the construction to the existing green tiling used in the underpass and would also imitate the roof of nearby Croydon College (located c. 30m SE of the underpass) (Figures 2 & 5).

## 2. AIMS & METHODOLOGY

### 2.1 Aims

2.1.1 National Planning Policy Framework (NPPF) paragraph 189 requires local planning authorities to request descriptions on the significance of any heritage assets affected by a proposal, including any contribution made by their setting. This states that:

*'The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'*

2.1.2 The aim of this report is to facilitate such a process by understanding the historical development of the application site and the likely impact upon any surviving heritage assets resulting from the proposed development, devising appropriate mitigation responses where necessary.

### 2.2 Consultation

2.2.1 During the production of this report, Paul Cooke (Assistant Heritage Consultant, AB Heritage) contacted Sanne Roberts (Conservation Officer, Croydon Borough Council Council) by email on 5<sup>th</sup> December 2018. Ms Roberts responded on the 13<sup>th</sup> December to advise consideration of the modernist history and heritage of the area, as well as the Croydon opportunity area planning framework.

### 2.3 Data Collation

2.3.1 The assessment has been carried out, in regard to the collation of baseline information, in line with the Chartered Institute for Archaeologists' Standard and Guidance for Historic Environment Desk-Based Assessment (January 2017) and the Historic England guide 'The Setting of Heritage Assets' (December 2017).

2.3.2 This assessment includes relevant information contained in various statutory requirements, national, regional and local planning policies and professional good practice guidance, including:

- Ancient Monuments and Archaeological Areas Act, 1979
- Planning (Listed Buildings and Conservation Areas) Act, 1990
- The National Planning Policy Framework, 2018

2.3.3 The Greater London Historic Environment Record is the primary source of information concerning the current state of archaeological and architectural knowledge in this area. The HER Commercial dataset search reference number for this project is 14519.

2.3.4 A 250m study area was considered to be the most appropriate in order to ensure any assets likely to be impacted by the development proposals were incorporated. The small-scale nature of the proposals and the urban environment means they are unlikely to be visible beyond a 250m radius.

2.3.5 The GLHER information was supported by examination of data from a wide range of other sources, principally:

- Heritage Gateway for information from the Greater London HER;
- Pastscape and other research resources, including the National Archives;
- The Historic England website professional pages, particularly the National Heritage List for England (NHLE); and
- A site visit was undertaken on 6<sup>th</sup> December 2018.

2.3.6 Additional relevant documentary resources at the Croydon Museum & Archives were accessed on the 6<sup>th</sup> December 2018, along with online historic sources. Information from these sources was used to understand:

- Information on statutory and non-statutory designated sites
- Readily accessible information on the proposed development site's history from readily available historic maps and photographs
- Any information on the proposed development site contained in published and unpublished historical sources;
- A greater understanding of key cultural heritage issues of the proposed development site and surrounding area, developed through the onsite walkover;
- The impact of the proposed development on the known and potential cultural heritage resource, resulting in the formulation of a mitigation strategy, where required, which appropriately targets any future works to those required to gain planning consent.

## 2.4 Assessment of the Cultural Heritage Resource

2.4.1 The importance of identified cultural heritage resources is determined by reference to existing designations (Table 1, below):

**Table 1: Assessing the Importance of a Cultural Heritage Site**

SCALE OF SITE IMPORTANCE	
<b>NATIONAL</b>	The highest status of site, e.g. Scheduled Monuments (or undesignated assets of schedulable quality and importance). Grade I and Grade II* Listed Buildings. Other listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the listing grade. Conservation Areas containing very important buildings. Undesignated structures of clear national importance. Extremely well-preserved historic landscape, whether inscribed or not, with exceptional coherence, time depth, or other critical factor(s).
<b>REGIONAL</b>	Grade II Listed Buildings or other designated or undesignated archaeological sites (in addition to those listed above), or assets of a reasonably defined extent and significance, or reasonable evidence of occupation / settlement, ritual, industrial activity etc. Examples may include areas containing buildings that contribute significantly to its historic character, burial sites, deserted medieval villages, Roman roads and dense scatter of finds.
<b>LOCAL</b>	Evidence of human activity more limited in historic value than the examples above, or compromised by poor preservation and/or survival of context associations, though which still have the potential to contribute to local research objectives. Examples include sites such as 'locally designated' buildings or undesignated structures / buildings of limited historic merit, out-of-situ archaeological findspots / ephemeral archaeological evidence and historic field systems and boundaries etc.
<b>NEGLIGIBLE</b>	Assets with very little or no surviving archaeological interest. Examples include destroyed antiquities, structures of almost no architectural / historic merit, buildings of an intrusive character or relatively modern / common landscape features such as quarries, drains and ponds etc.
<b>UNKNOWN</b>	Insufficient information exists to assess the importance of a feature (e.g. unidentified features on aerial photographs).

2.4.2 For some types of finds or remains there is no consistent value and the importance may vary, for example Grade II Listed Buildings and Conservation Areas. For this reason, adjustments are occasionally made, where appropriate, based on professional judgement.

## 2.5 Impact Assessment Criteria

2.5.1 The magnitude of impact upon the heritage resource, which can be considered in terms of direct and indirect impacts, is determined by identifying the level of effect from the proposed development upon the baseline conditions of the site and the cultural heritage resource identified. The criteria for assessing the magnitude of impact are set out in Table 2 (below).

2.5.2 In certain cases, it is not possible to confirm the magnitude of impact upon a cultural heritage resource, especially where anticipated buried deposits exist. Where possible a professional judgement as to the scale of such impacts is applied to enable the likely 'Significance of Effects' to be established; however, a magnitude level of 'uncertain' is included for situations where it is simply not appropriate to make such a judgement at this stage of works.



**Table 2: Criteria for Determining Magnitude of Impact**

IMPACT LEVEL	DEFINITION
<b>HIGH</b>	Changes to most or all of the key archaeological or key heritage baseline elements, or comprehensive changes to the setting of such key features that lead to total or almost complete alteration of a features physical structure, dramatic visual alteration to the setting of a heritage asset, or almost comprehensive variation to aspects such as noise, access, or visual amenity of the historic landscape.
<b>MEDIUM</b>	Changes to many key archaeological materials/historic elements, or their setting, such that the baseline resource is clearly modified. This includes considerable visual change to many key aspects of the historic landscape, noticeable differences in noise or sound quality, and considerable changes to use or access changes to key historic landscape elements
<b>LOW</b>	Detectable impacts which alter the baseline condition of an archaeological or heritage receptor to a slight degree – e.g. a small proportion of the surviving heritage resource is altered; slight alterations to the setting or structure, or limited changes to aspects such as noise levels, use or access that results in limited changes to historic landscape character.
<b>NEGLIGIBLE</b>	Barely distinguishable change from baseline conditions, where there would be very little appreciable effect on a known site, possibly because of distance from the development, method of construction or landscape or ecological planting, that are thought to have no long-term effect on the historic value of a resource.
<b>UNCERTAIN</b>	Extent / nature of the resource is unknown and the magnitude of change cannot be ascertained.

2.5.3 The overall Significance of Effects from the proposed development upon the Cultural Heritage Resource is determined by correlating the magnitude of Impact against value of the Cultural Heritage resource. Table 3 highlights the criteria for assessing the overall Significance of Effects. Where effects are moderate or above these are classified as significant.

**Table 3: Significance of Effects**

IMPORTANCE	MAGNITUDE			
	HIGH	MED	LOW	NEG
<b>NATIONAL</b>	Severe	Major	Mod	Minor
<b>REGIONAL</b>	Major	Mod	Minor	Not Sig.
<b>LOCAL</b>	Mod	Minor	Minor	Not Sig.
<b>NEGLIGIBLE</b>	Minor	Not Sig.	Not Sig.	Nt.

Not Sig. = Not Significant; Nt. = Neutral; Mod = Moderate

## 2.6 Limitations

2.6.1 It should be noted that the report has been prepared under the express instruction and solely for the use of Wildstone Planning and their client Croydon Borough Council, and any associated parties they elect to share this information with. Measurements and distances

referred to in the report should be taken as approximations only and should not be used for detailed design purposes.

- 2.6.2 All the work carried out in this report is based upon the professional knowledge and understanding of AB Heritage on current (December 2018) and relevant United Kingdom standards and codes, technology and legislation. Changes in these areas may occur in the future and cause changes to the conclusions, advice, recommendations or design given. AB Heritage does not accept responsibility for advising the client's or associated parties of the facts or implications of any such changes in the future.
- 2.6.3 This report has been prepared utilising factual information obtained from third party sources. AB Heritage takes no responsibility for the accuracy of such information. It should also be noted that this report represents an early stage of a phased approach to assessing the archaeological and cultural heritage resource of the application site to allow the development of an appropriate mitigation strategy, should this be required. It does not comprise mitigation of impacts in itself.
- 2.6.4 Access to the underpass itself was not attempted for safety reasons due to lack of dedicated pedestrian access.

### 3. CULTURAL HERITAGE RESOURCE BASELINE

#### 3.1 Known Cultural Heritage Assets

##### Within the Proposed Development Site

3.1.1 There are no known cultural heritage assets within the proposed development site.

##### Within the Study Area

3.1.2 Within the 250m study area around the site, there are a total of four Statutorily Designated cultural heritage assets and 46 locally listed structures. Due to the non-intrusive nature of this work, no archaeological assets have been considered.

3.1.3 The Central Croydon Conservation Area is located within the study area, but the proposed sites do not sit within it. It is considered that the small-scale nature of the proposed development, in an area already busy with street furniture, would have little to no impact upon the Conservation Area, and therefore this has not been included within the following assessment.

3.1.4 It is considered that only the structures and the advertising hoarding aspects of the design proposal have the potential to impact on any heritage assets. Based on the location and orientation of these structures, the following six heritage assets will be assessed:

- Grade II Listed former electricity offices and showrooms on Wellesley Road (NHLE List Entry Number: 1262008), located c. 20m NW of the underpass;
- Grade II Listed former SEGAS Offices at 32 Park Lane (NHLE List Entry Number: 1262041), located c. 100m SW of the underpass;
- Norfolk House (on A212 / Wellesley Road) – Locally Listed Building, located c. 35m NE of the underpass;
- 43 George Street – Locally Listed Building, located c. 10m W of the underpass;
- Croydon College (A212 / Park Lane) – Locally Listed Building, located c. 30m SE of the underpass; and
- Fairfield Halls (on A212 / Park Lane) - Locally Listed Building, located c. 160m SE of the underpass.

## 4. HISTORIC DEVELOPMENT OF SITE

- 4.1.1 Due to the modern nature of Croydon Underpass and the location of the proposed development atop it, this section will seek only to illustrate the more recent development of the site and its surrounding area.
- 4.1.2 The 1873 publication 25-inch Ordnance Survey (OS) map shows the location of the site, with the approximate location of the northern and southern underpass entrances highlighted in red (Plate 1).
- 4.1.3 This part of the town can be seen to be relatively open, the terraces of George Street and Addiscombe Road to its east (now also George Street) giving way to gardens and fields to the north and south.

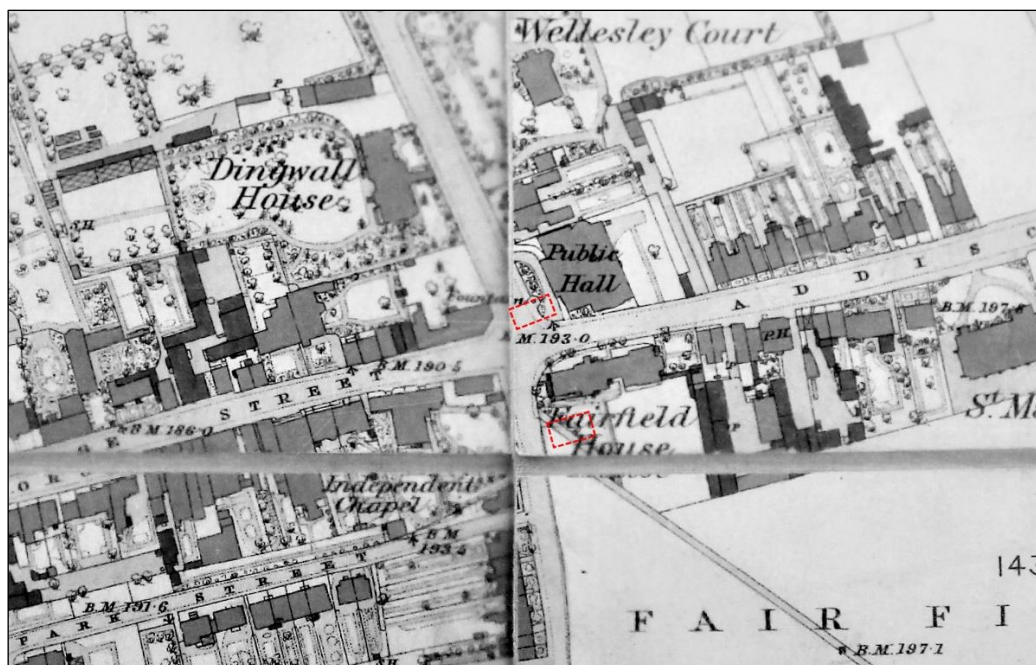


Plate 1: 1873 publication 25" OS map extract

- 4.1.4 The 1913 publication 25" OS map shows the area around the proposed site location becoming increasingly urbanised and modern (Plate 2).
- 4.1.5 A train yard can be seen to now be situated to the south, while a tramway runs east – west along George Street, linking with the High Street to the west. A general infilling of rear plots and gardens, especially along George Street and former Addiscombe Road is apparent, including in the area formerly occupied by Fairfield House. A Fire Engine Station is also visible on Park Street.



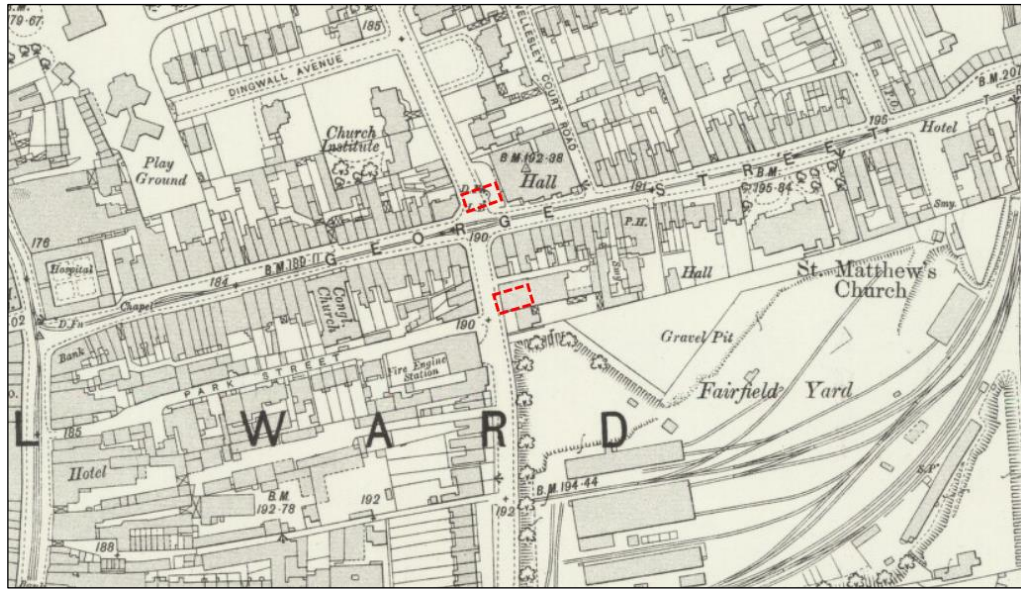


Plate 2: 1913 25" OS map

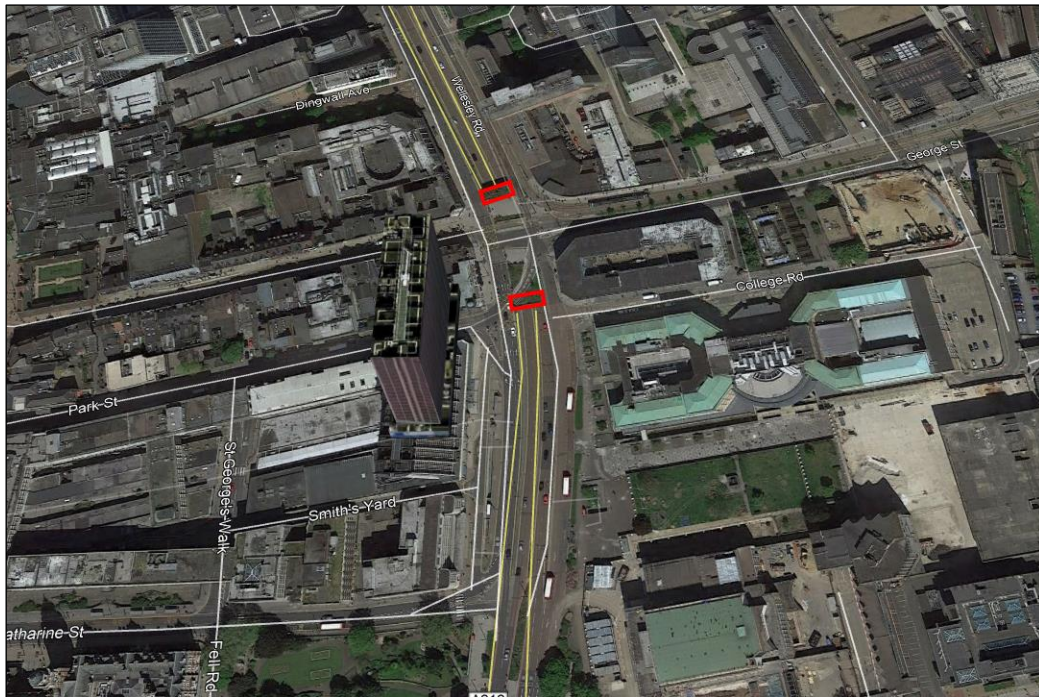
4.1.6 The 1955 publication 25" OS map shows further changes to the area (Plate 3). Croydon Underpass is yet to be constructed, but the Borough of Croydon Electric House can be seen to have been constructed, c. 25m north-west of the northern underpass entrance / exit. The tramway can also be seen to have been removed along with the train yard to the south, replaced by car-parking.



Plate 3: 1955 25" OS map

4.1.7 The 1951 Croydon Development Plan put forward the plan for an underpass, stating 'It is proposed to construct an underpass or bridge across George Street carrying traffic from

Wellesley Road into Park Lane'. This was part of a broader vision for Croydon, which sought to replace the perceived 'dreary' Victorian buildings with a more modern town. Croydon Underpass was opened by 1965, with Wellesley Road widened to accommodate a dual carriageway (Roads.org.uk, 2018).



**Plate 4: Current layout of A212, proposed site locations outlined in red**

- 4.1.8 Plate 4 shows the existing layout of the A212 and the area around it. Widescale changes to the area are visible compared to the depictions in Plates 1 – 3.
- 4.1.9 The buildings which previously formed the southern edge of the east branch of George Street on Plate 3 can be seen to have been completely removed and replaced. To the south-east of the underpass, the former train-yard and car-park has been replaced by buildings such as Croydon College and Fairfields Halls at the base of the image.
- 4.1.10 To the south-west and north-east of the underpass, former terrace housing and other buildings have been replaced, including by Norfolk House. However, the survival of most buildings along the western edge of the A212, such as the former SEGAS and the former electricity offices demonstrate that this street line survives the Croydon underpass expansion in the 1950s.



## 5. SITE VISIT

5.1.1 A site visit was conducted by Paul Cooke on the 6<sup>th</sup> December 2018. This was to better understand the relationship between the proposed site and any nearby heritage assets, and the likely impacts from the proposed works. To more clearly discuss the appreciation of the proposed site locations, these have been split into the proposed northern and southern locations.

### 5.2 Northern underpass portal

5.2.1 The proposed site of the northern structure is above the A212/Wellesley Road, visible in Photo 1. This location is currently occupied by existing planting and a metal railing.

5.2.2 As demonstrated by the photo, views of the structure, and particularly the advertising element, will be partially obscured from ground level due to the low parapet and metal barrier which guard the sides of the underpass (Photos 1 & 2).



**Photo 1: Proposed site of northern planter, view from NW (A212 / Wellesley Road)**

5.2.3 Due to the current traffic arrangement, there is no pedestrian access alongside the underpass. Therefore, the key view of the proposed advertising sign at the underpass portals will be from cars entering it.



**Photo 2: Proposed site of northern planter, view from north: former electricity offices on right of picture, Norfolk House tall building at extreme left**

- 5.2.4 Photo 2 demonstrates that, due to traffic and the intervening street furniture and underpass parapets, long views of the planter are likely to be limited.
- 5.2.5 Photo 3 also shows the view towards the northern underpass portal from the west arm of George Street, looking north-west. The width of the A212 and George Street allows for views to the proposed planter location, although there are no views to the proposed advertising sign. Norfolk House (the Travelodge at the right of Photo 3), the former electricity offices (central building on left of Photo 3) and 43 George Street (left of Photo 3) are also visible.



**Photo 3: View towards northern underpass portal from junction of George Street and A212**



### 5.3 Southern underpass portal

5.3.1 The proposed site of the southern underpass portal is on the A212 / Park Lane (Photo 4). As with the southern portal, this location is currently occupied by existing planting and an arched metal rail.



Photo 4: View of proposed site from the south (A212 / Park Lane)

As with the proposed northern structure, views towards the proposed location of the advertising hoarding are limited from the east and west sides of the A212 / Park Lane, and non-existent from the north, east and west (Photo 5).

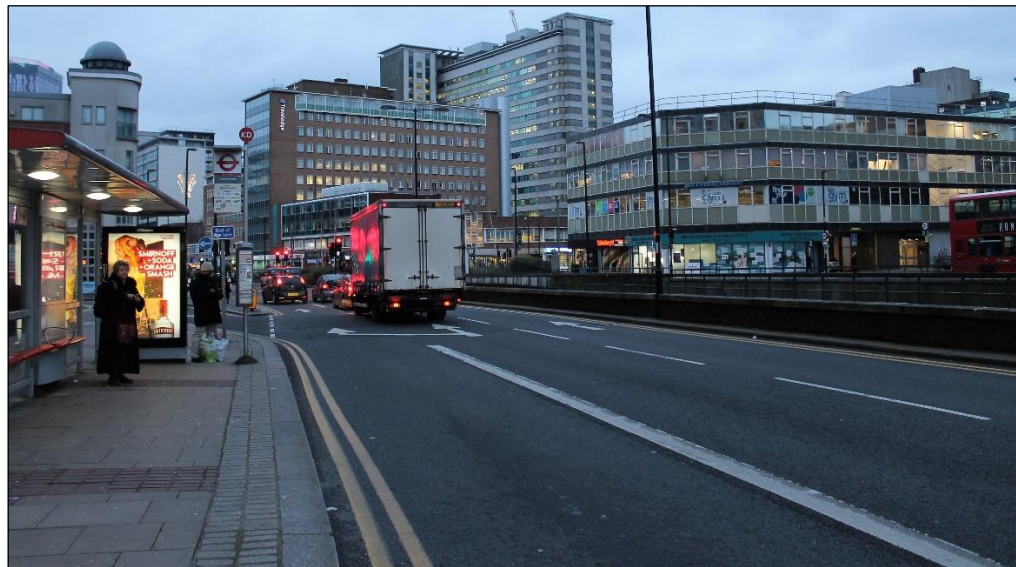


Photo 5: View to proposed site from the SW

5.3.2 There are clear views to the proposed location of the structure from George Street to the east and west as well as from Park Street, barring interruption by street furniture (Photo 6).



**Photo 6: View of proposed site from corner of A212 and George Street, looking south-east at Croydon College**

- 5.3.3 The commercial nature of the immediate area, especially around the junction between the A212 and George Street, is visible in Photos 1 – 6, with many commercial establishments and associated signage. This includes the Travelodge at Norfolk House, and the Sainsburys at Suffolk House on the A212 / George Street junction, to name only two obvious examples.

## 6. HERITAGE REVIEW

### 6.1 Current Setting of the A212 - Wellesley Road / Park Lane

6.1.1 There are six heritage assets that it is considered have the potential to be affected by the proposed development, as discussed in Section 3.1. These are:

- Grade II Listed former electricity offices and showrooms on Wellesley Road (NHLE List Entry Number: 1262008), located c. 20m NW of the underpass;
- Grade II Listed former SEGAS Offices at 32 Park Lane (NHLE List Entry Number: 1262041), located c. 100m SW of the underpass;
- Central Croydon Conservation Area – located c. 10m W of the underpass;
- Norfolk House (on A212 / Wellesley Road) – Locally Listed Building, located c. 35m NE of the underpass;
- 43 George Street – Locally Listed Building, located c. 10m W of the underpass;
- Fairfield Halls (on A212 / Park Lane) - Locally Listed Building, located c. 160m SE of the underpass.

6.1.2 As Grade II Listed Buildings, the former SEGAS Offices and former Electricity offices and showrooms are considered to be of Regional Importance, in line with Table 1. This is because they are surviving examples of early modern architecture (both constructed between 1939 - 1942) in good condition.

6.1.3 The other four assets (43 George Street, Croydon College, Fairfield Halls and Norfolk House) are considered to be of Local Importance, in line with Table 1. These are Locally Listed and were all constructed during the 20<sup>th</sup> century, with their significance deriving from their architectural and aesthetic values.

6.1.4 While not a heritage asset itself, all the assets listed above are located along the routeway of the A212, which comprises Park Lane and Wellesley Road to the south and north respectively. Therefore, it is considered these assets share a broadly similar setting.

6.1.5 This setting is one of mixed residential and commercial use, with limited exceptions, such as Croydon College, which is an educational establishment. This environment is typical of a busy town centre on the outskirts of London. The A212, with its associated traffic, is a factor in experiencing the setting, providing constant movement and noise.

6.1.6 The busy, commercial aspect of the setting has apparently not changed, at least significantly, in the time since these buildings were constructed during the mid-20<sup>th</sup> century.

6.1.7 After architectural and design values, setting is therefore considered to play a key role in the heritage importance of the heritage assets listed above.

## 7. IMPACT ASSESSMENT & RECOMMENDATIONS

### 7.1 Predicted Impact of Proposed Croydon Underpass Development

- 7.1.1 Although the proposed development locations were evaluated separately in Section 5, the design of the structures is identical, and it is considered that their impacts will be also be identical. Therefore, the structures will be assessed jointly from this point.
- 7.1.2 As outlined in Paragraph 1.3, the current design proposal is for two copper structures with zinc coating on their upper parts, located over the northern and southern portals of Croydon Underpass, containing advertising facing out from within the portals and a planter at pavement level. These proposals will have no direct impact on any heritage assets.
- 7.1.3 The planters are considered to be a neutral addition, as they will replace or form an accompaniment to existing street level planters on the road junctions.
- 7.1.4 While the zinc coated structures are likely to reduce views at ground level along the A212 / Park Lane / Wellesley Road, these views are currently partially interrupted by the existing planters, street furniture and the parapets and railings bordering the underpass. Furthermore, the design and colour will visually tie the structures to the roof of Croydon College (Photo 6) and the green tiling within the underpass.
- 7.1.5 Therefore, it is considered that these will have a Negligible Adverse Magnitude of Impact on the setting of the six heritage receptors discussed in Section 6, (in line with Table 2). This is because the development will constitute a barely distinguishable visual change to the current setting in an area where there is already an amount of street furniture present.
- 7.1.6 In line with Table 3, a Negligible Adverse Magnitude of Impact is considered to result in a Not Significant Significance of Effects, on assets of both Regional Importance (former SEGAS offices, former electric offices) and Local Importance (43 George Street, Croydon College, Norfolk House and Fairfields Halls).
- 7.1.7 The advertising hoardings are considered to be in keeping with the current setting, which features a strong commercial element, including highly visible advertising on prominent buildings, such as the Travelodge at Norfolk House, or the Sainsburys at Suffolk House.
- 7.1.8 Furthermore, the advertising will only be partially visible from street level and is assumed to be temporary and replaceable, therefore not creating a permanent alteration to the setting (Figure 4).
- 7.1.9 Therefore, the advertising element of the proposed structures is considered to constitute a Negligible Adverse Magnitude of Impact on the setting of affected heritage receptors, in line with Table 2. This is because there will only be a marginal visual alteration to the area, with the advertising in keeping with the existing setting and likely to be non-permanent. This also results in a Not Significant Significance of Effects in line with Table 3.
- 7.1.10 Taken as a whole the predicted Magnitude of Impact of the proposed development to the six affected heritage receptors (former SEGAS offices, former electric offices, 43 George Street, Croydon College, Norfolk House and Fairfields Halls) is considered to be Negligible Adverse,

(in line with Table 2), as the proposed works will constitute very low-level visual change to the existing setting.

- 7.1.11 In line with Table 3, a Negligible Adverse Magnitude of Impact is considered to result in a Not Significant Significance of Effects, on assets of both Local and Regional Importance.



## 8. CONCLUSION

- 8.1.1 This document has considered the likely heritage impacts of proposals to install two structures containing planters and advertising at the northern and southern ends of the Croydon Underpass.
- 8.1.2 The planters are considered to be a neutral addition to the existing street scene as they will neither add nor detract anything from the existing street scene, and therefore will have no heritage impact.
- 8.1.3 The construction of the zinc-coated structures at either end of the underpass will result in a change to the current views along the A212 at ground level. However, the design of these structures is intended to tie them in to existing visual elements of the area, namely the tiling of the underpass and the roof of Croydon College. Therefore, these proposals are considered to have a Not Significant, significance of effects upon the surrounding Heritage Assets as defined in Table 3.
- 8.1.4 The advertising which will be provided by this development in either portal will be facing approaching traffic and only partially visible from ground level. It is considered to be in keeping with the current busy and colourful commercial setting. Therefore, this aspect of the proposal is considered to constitute a Not Significant, significance of effects upon the surrounding Heritage Assets as defined in Table 3.
- 8.1.5 No further heritage work is recommended. The final decision on further heritage work lies with the LPA.

## 9. REFERENCES

### 9.1 Documentary & Cartographic Sources

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## Appendices



## Appendix 1      Planning Policy

### Introduction

The following section highlights the key planning and legislative framework relevant to this project, including legislative framework, national planning policy and relevant sector guidance.

### Statutory Protection for Heritage Assets

Current legislation, in the form of the Ancient Monuments and Archaeological Areas Act 1979, provides for the legal protection of important and well-preserved archaeological sites and monuments through their addition to a list, or 'schedule' of archaeological monuments by the Secretary of State for Digital, Culture, Media and Sport. This necessitates the granting of formal Scheduled Monument Consent for any work undertaken within the designated area of a Scheduled Monument.

Likewise, structures are afforded legal protection in the form of their addition to 'lists' of buildings of special architectural or historical interest. The listing of buildings is carried out by the Department of Digital, Culture, Media and Sport under the Planning (Listed Buildings and Conservation Areas) Act, 1990. The main purpose of the legislation is to protect buildings and their surroundings from changes that would materially alter the special historic or architectural value of the building or its setting. This necessitates the granting of formal Listed Building Consent for all works undertaken to or within the designated curtilage of a Listed Building. This legislation also allows for the creation and protection of Conservation Areas by local planning authorities to protect areas and groupings of historical significance.

The categories of assets with some form of legal protection have been extended in recent years, and now include Registered Parks and Gardens, and Historic Battlefields. While designation as a UNESCO World Heritage Site is not a statutory designation under English planning law, such a designation is regarded as a material consideration in planning decisions, and World Heritage Sites are in practice protected from development that could affect any aspect of their significance including settings within the Site and a buffer zone around it.

### National Planning Policy

The NPPF sets out government policy on the historic environment, which covers all elements, whether designated or not, that are identified as 'having a degree of significance meriting consideration in planning decisions, because of its heritage interest'.

One of the over-arching aims is to 'Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations'. To achieve this, local planning authorities can request that the applicant describe 'the significance of any heritage assets affected, including any contribution made by their setting'. The level of detail required in the assessment should be 'proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'. It goes on to say that 'where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

A key policy within the NPPF is that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be'.

With regard to non-designated heritage assets specific policy is provided in that a balanced judgement will be required having due regard to the scale of any harm or loss and the significance of the heritage asset affected.

Paragraph 194 states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional, while substantial harm to or loss of designated heritage assets of the highest significance, should be wholly exceptional'.

Paragraphs 195 & 196 explain that 'where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss'.

It also advises that where a proposal involve less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

## **Local Planning Policy**

### The London Plan 2016

The current London Plan was updated in March 2016. It provides a framework for development in the Greater London region and contains the following relevant policy:

#### **POLICY 7.8 HERITAGE ASSETS AND 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.

### Croydon Local Plan

The Croydon Borough Local Plan 2018 was formally adopted on 27<sup>th</sup> February 2018. Policies relevant to this assessment are listed below.

Further guidance is provided in the Croydon Draft Supplementary Planning Document.

### **Strategic Objective 5:**

Ensure that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage.

### **Policy SP4: Urban Design and Local Character**

#### *Public Realm*

SP4.8 The Council with its partners will improve Croydon's public realm to respect, enhance, create local character and distinctiveness, and integrate with the historic environment.

#### *Character, Conservation and Heritage*

SP4.11 The Council and its partners will promote the use of heritage assets and local character as a catalyst for regeneration and cohesion and to strengthen the sense of place.

SP4.12 The Council and its partners will respect, and optimise opportunities to enhance, Croydon's heritage assets, their setting and the historic landscape, including through high quality new development and public realm that respects the local character and is well integrated.

### **Policy DM12: Advertisement hoardings**

DM12.1 To ensure advertisement hoardings positively contribute to the character and appearance of existing and new streets, the Council will require advertisement hoardings to:

- c. Reinforce the special character of heritage assets and other visually attractive parts of the borough

### **Policy DM18: Heritage assets and conservation**

DM18.1 To preserve and enhance the character, appearance and setting of heritage assets within the borough, the Council will determine all development proposals that affect heritage assets in accordance with the following:

- a. Development affecting heritage assets will only be permitted if their significance is preserved or enhanced;
- b. Proposals for development will only be permitted if they enhance the setting of the heritage asset affected or have no adverse impact on the existing setting.




DM18.2 Applications for development proposals that affect heritage assets or their setting must demonstrate:

- a. How particular attention has been paid to scale, height, massing, historic building lines, the pattern of historic development, use, design, detailing and materials;
- b. That it is of a high-quality design that integrates with and makes a positive contribution to the historic environment.





**KEY**

-  Site Locations
  -  Locally Listed Building
  -  Listed Building
1. Croydon College
  2. Norfolk House
  3. Fairfield Halls
  4. 32 Park Lane, Former SEGAS Offices
  5. Electricity Showrooms and Offices
  6. 43 George Street

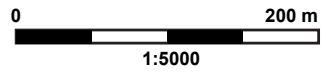


Figure 1: Site Location

Project: Croydon Underpass

Date: 14/12/18

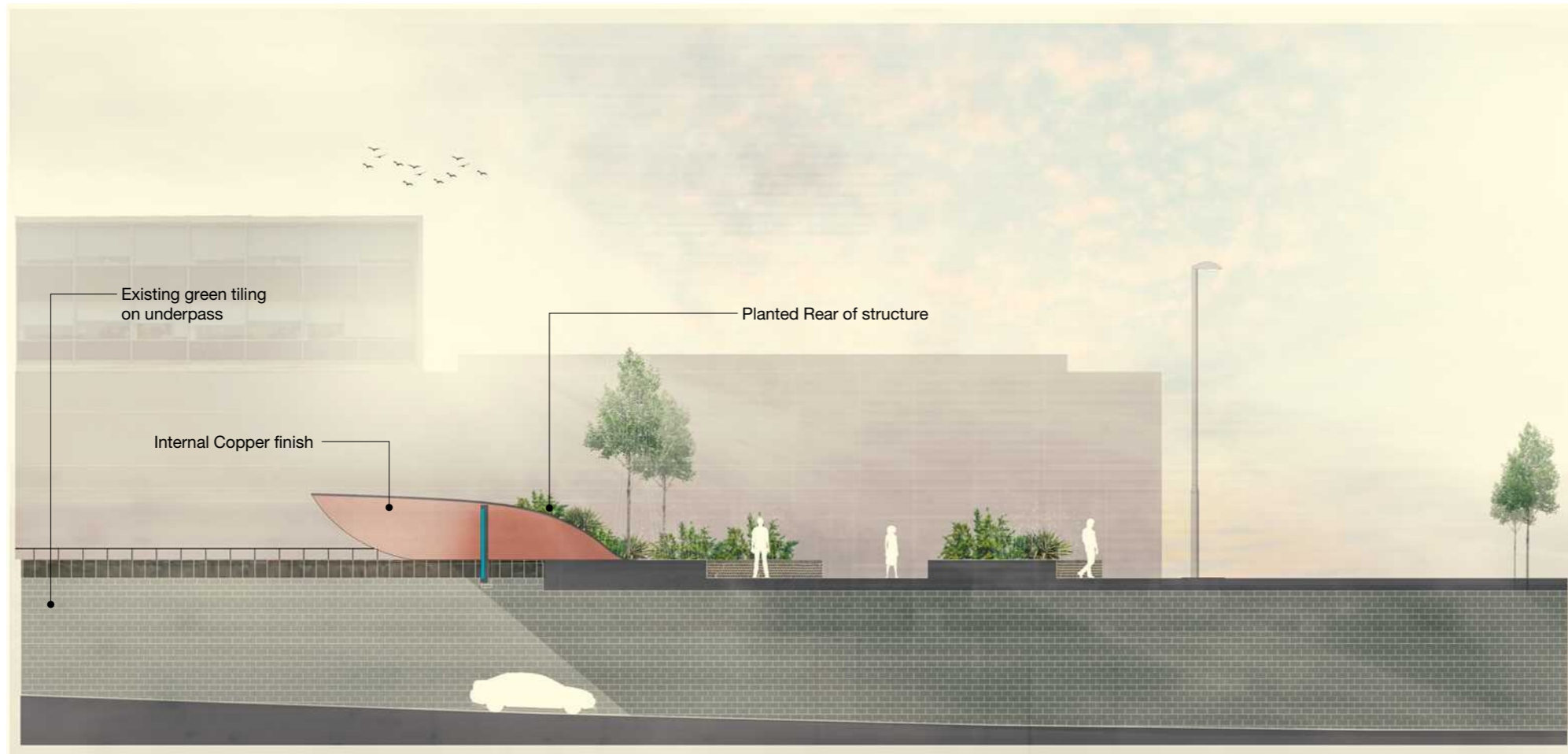
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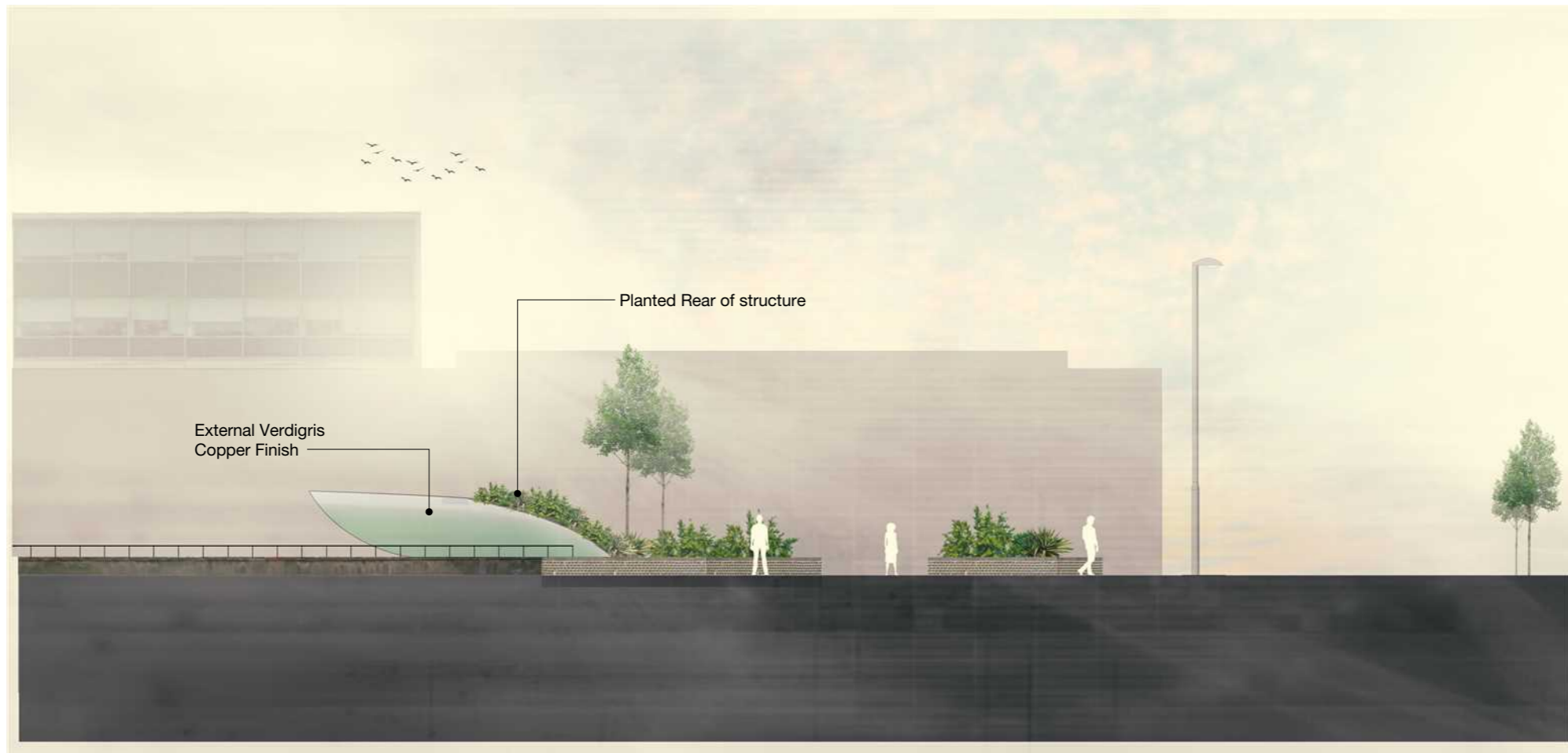


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Section



Elevation

// Title  
Section & Elevation

// Project  
Wellesley Road Underpass  
Croydon

Client  
-

Job No. 550  
Issued 17/11/17

Drawn By ML  
Checked By

Signed By  
Scale NTS @ A3

// Key

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CGI

// Project  
Wellesley Road Underpass  
Croydon

Client  
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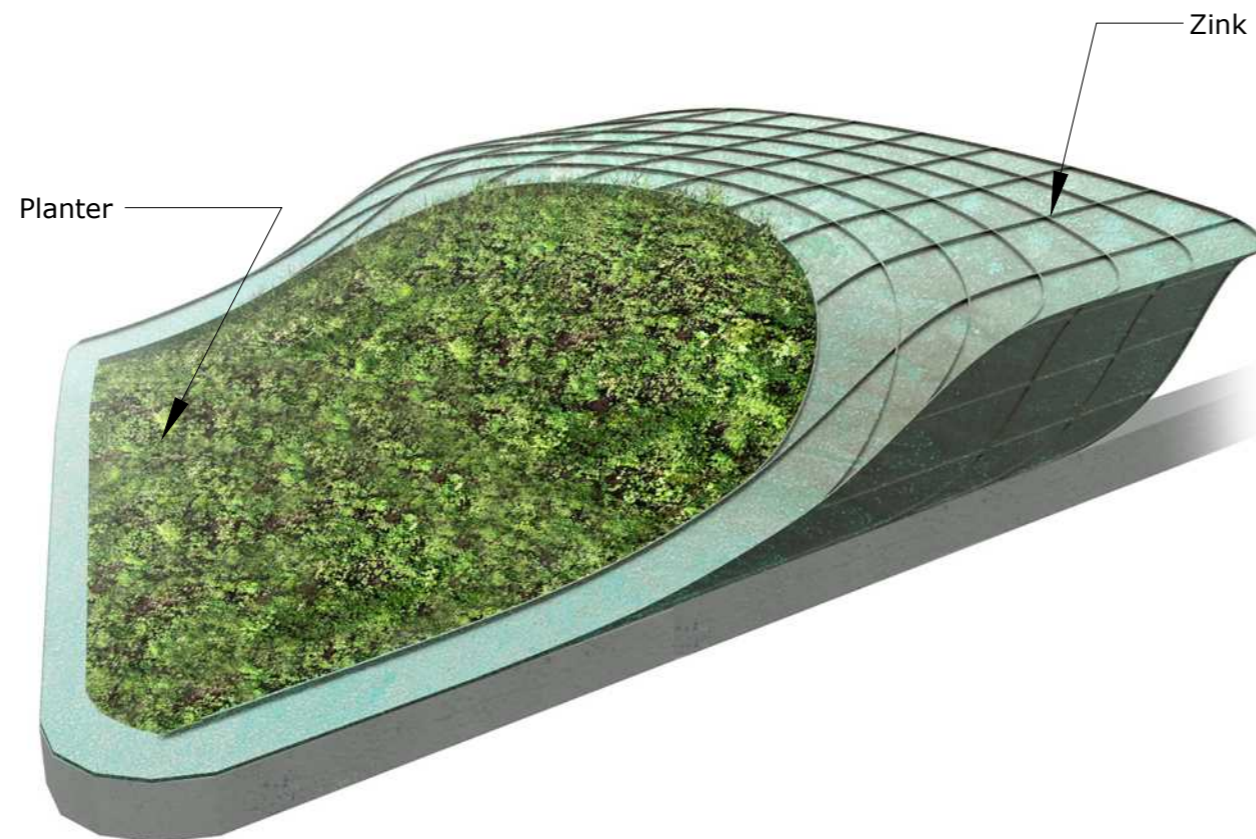
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