



Historic England

Mr James Garside
London Borough of Richmond Upon
Thames
Civic Centre,
44 York Street,
Twickenham
TW1 3BZ

Your Ref: 18/2977/FUL
Our Ref: CLO27356
Contact: Laura O’Gorman
Direct Dial: 0207 973 3242
Email: laura.o’gorman@
HistoricEngland.org.uk

02 October 2018

Dear Mr Garside,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2012**

Marble Hill House Marble Hill Park Richmond Road Twickenham TW1 2NL

1. Marble Hill House: External decoration and repair work (if a window is substantially rotten, partial or full replacement of joinery) and replacement rooflight. 2. Stable Block: External alterations, installation of mechanical plant, timber plant enclosure to the rear and front landscaping (creating an outdoor seating area) to facilitate the refurbishment of the existing café. 3. Service Yard: new pedestrian access and associated refuse storage facilities. 4. Landscaping: new soft and hard landscaping including restoration of gardens, upgrade of sports pitches and facilities, replacement of seating and new play areas. 5. Sports Centre: External ramp for improved access.

Recommend Archaeological Condition(s)

Thank you for your consultation dated 17 September 2018.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified for the Local Plan: Twickenham and Marble Hill.



Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
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Following close consultation with this office the applicant has submitted a number of documents which clearly set out the site's archaeological potential. Twickenham became a very fashionable place to live, particularly in the 17th and 18th centuries, and country retreats lined the riverside. Marble Hill House is one such country retreat and includes the garden and park created for Henrietta Howard, Countess of Suffolk by, amongst others, Alexander Pope and Charles Bridgeman.

Although there is a background potential for prehistoric, Roman and Saxon archaeological remains, the main archaeological potential are for garden features associated with the original creation of the house and gardens, as demonstrated by the submitted assessments and the various archaeological interventions which have been carried out as part of this application. The proposals which includes the restoration of the gardens, upgrades to the sports pitches and new play and storage facilities will have some archaeological impact however this could be appropriately mitigated through the implementation of a watching brief during the development works.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains. However the significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. I therefore recommend the following conditions on any consent:

Archaeology Condition

- Condition No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and
- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
 - B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI
- Informative The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This is a pre-commencement condition justified by the need for clarity on what is necessary to safeguard archaeological interest once works begin on site. The archaeological work should include:

Watching Brief

A watching brief involves the proactive engagement with the development groundworks to permit investigation and recording of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

Historic Building Recording Condition

- Reason Built heritage assets on this site will be affected by the development. The planning authority wishes to secure building recording in line with NPPF, and publication of results, in accordance with Section 12 of the NPPF.



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- Informative The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

Public Engagement Condition

- Reason The planning authority wishes to secure public interpretation and presentation of the site's archaeology in line with London Plan Policy 7.8.
- Condition No development shall commence until details of an appropriate programme of public engagement including a timetable have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.
- Informative Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.

You can find more information on archaeology and planning in Greater London on our website.

This response only relates to archaeology. You should also consult Historic England's Development Management on statutory matters.

Yours sincerely



Laura O'Gorman
Assistant Archaeology Advisor
Greater London Archaeological Advisory Service
Planning Group: London



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