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## Greggs Bakery / Twickenham

### Archaeological Desk-Based Assessment

Local Planning Authority:  
London Borough of  
Richmond-upon-Thames

Site centred at:  
TQ 15333 73324

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## EXECUTIVE SUMMARY

The site of the former Greggs Bakery, Gould Road, Twickenham, London has been reviewed for its below ground archaeological potential.

In terms of relevant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Historic Battlefield or Historic Wreck Sites lie within the immediate vicinity of the site.

The site is considered to have a low archaeological potential for remains associated with all periods of human activity.

The site is partly located within the Crane Valley Archaeological Priority Area as designated by the London Borough of Richmond-upon-Thames. The APA covers the course of the River Crane which supported 18<sup>th</sup> century Oil and Paper Mills, a brewery and the manufacture of gunpowder. The historical map regression exercise has demonstrated that no such structures existed on the site which remained undeveloped until the 20<sup>th</sup> century.

The site wide 20<sup>th</sup> century construction comprising the laundry and subsequent bakery within the site will have had a severe localised negative impact on below ground archaeological deposits due to the cutting of foundations and services.

The multiple phases of remodelling of the bakery buildings within the site during the 20<sup>th</sup> century is considered to have had a further cumulative severe widespread negative impact on below ground archaeological deposits due to the cutting of foundations and services.

Current redevelopment proposals comprise demolition of the existing building, followed by the construction of a mixed commercial/residential development. No underground car parks or basements are proposed in the scheme.

On the basis of the available information, the GLHER, historical mapping, past developmental impacts and the proposed development design (largely within the existing building footprints) we recommend that no further archaeological investigation is required on this site.

Due to the nature of the archaeological investigation required, such mitigation will necessarily follow the granting of planning consent secured by an appropriate condition.

Due to the size of the site and its location within the APA, the London Borough of Richmond-upon-Thames's archaeological advisor at the Greater London Archaeological Advisory Service

(GLAAS) may take a precautionary approach and require further archaeological mitigation measures in conjunction with the proposed development.

If archaeological mitigation is required, this could be secured by a suitably worded condition attached to planning consent.

## 1.0 INTRODUCTION AND SCOPE OF STUDY

- 1.1 This archaeological desk-based assessment has been researched by Jazmin Sexton, and prepared by Peter Reeves of CgMs Heritage (part of the RPS Group Plc) on behalf of London Square.
- 1.2 The subject of this Assessment comprises the site of the former Greggs Bakery, Gould Road, Twickenham, London TW2 6RT (Plates 1 to 13). The site is centred at TQ 15333 73324 within the London Borough of Richmond-upon-Thames (see Figures 1 and 2). The site, comprising an irregular plot set within a residential area, is bounded by Edwin and Gould Road to the south, residential properties to the west and east (Crane Road and Norcutt Road respectively), and the River Crane to the north. Overall the site measures approximately 1.9ha in size.
- 1.3 The site is partly located within the Crane Valley Archaeological Priority Area as designated by the London Borough of Richmond-upon-Thames. The APA (HER ref: DLO33459) covers the course of the River Crane which supported 18<sup>th</sup> century Oil and Paper Mills, a brewery and the manufacture of gunpowder. The historical map regression exercise has demonstrated that no such structures associated with these industries existed on the site. The study site remained undeveloped until the 20<sup>th</sup> century.
- 1.4 In terms of relevant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Historic Battlefield or Historic Wreck Sites lie within the immediate vicinity of the site.
- 1.5 London Square has commissioned CgMs Heritage to establish the archaeological potential of the site, and to provide guidance on ways to accommodate any archaeological constraints identified.
- 1.6 The desk-based assessment is specific to below ground heritage assets, archaeology. Potential developmental impacts on Conservation Areas and Listed Buildings, above ground heritage assets, are not considered in this report.
- 1.7 In line with national, regional and local policy and guidance, this desk-based assessment comprises an examination of evidence on the Greater London Historic Environment Record (GLHER) and other sources, including the Richmond Local Studies Collection. The report also includes the results of a comprehensive map regression exercise and the results of a site visit. An exterior site inspection was conducted in February 2019.

- 1.8 The Assessment thus enables relevant parties to assess the archaeological potential of various parts of the site and to consider the need for design, civil engineering, and archaeological solutions to the archaeological potential identified.



## 2.0 DEVELOPMENT PLAN FRAMEWORK

- 2.1 National legislation regarding archaeology, including scheduled monuments, is contained in the Ancient Monuments and Archaeological Areas Act 1979, amended by the National Heritage Act 1983 and 2002, and updated in April 2014.
- 2.2 In March 2012, the government published the National Planning Policy Framework (NPPF), which replaces national policy relating to heritage and archaeology (Planning Policy Statement 5: Planning for the Historic Environment). More recently (March 2014) National Planning Policy Guidance (NPPG) has been published.
- 2.3 In March 2012, the government published the National Planning Policy Framework (NPPF), which was later revised in July 2018. The NPPF is supported by the National Planning Practice Guidance (NPPG), which was published online 6th March 2014 and last updated February 2019 (<http://planning.guidance.planningportal.gov.uk>).
- 2.4 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

- 2.5 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 contributes to our knowledge and understanding of the past.
- 2.6 Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should

be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

- 2.7 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 in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made **by their setting. 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. 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.
- 2.8 Paragraph 190 adds Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict **between the heritage asset's conservation and any aspect of the proposal.**
- 2.9 Paragraph 193 adds that when considering potential impacts of a proposed development on the significance of a designated heritage asset, great weight should be given to the **asset's conservation** (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 2.10 Paragraph 194 adds 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 buildings, or grade II registered parks or gardens, should be exceptional;
  - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

- 2.11 *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.
- 2.12 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. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.
- 2.13 A *Designated Heritage Asset* comprises a: World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.
- 2.14 *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.**
- 2.15 Paragraph 195 states 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 total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
  - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
  - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 2.16 Paragraph 196 adds where a development proposal will lead to 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, where appropriate, securing its optimum viable use.

- 2.17 Paragraph 197 adds the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect 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.
- 2.18 Paragraph 198 states Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
- 2.19 Paragraph 199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible<sup>64</sup>. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.
- 2.20 In short, government policy provides a framework which:
- Protects nationally important designated Heritage Assets (which include World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or Conservation Areas).
  - 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.
- 2.21 The NPPG was published online 6<sup>th</sup> March 2014 and updated 10<sup>th</sup> April 2014. This guidance 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.

- 2.22 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

- 2.13 The relevant Strategic Development Plan framework is provided by the London Plan Consolidated with Alterations Since 2011. The Further Alterations to the London Plan (FALP) were adopted 10 March 2015. This document includes the revised early minor alterations to the London Plan which were published in October 2013. There are no changes to Policy 7.8; slight amendments have been made to the wording of Policy 7.10 World Heritage Sites, cross referencing this policy with the Supplementary Planning Guidance document for the setting of World Heritage Sites prepared in 2012.
- 2.14 Policy in the Consolidated London Plan relevant to archaeology at the study site 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 BOROUGHSHOULD, 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 BOROUGHSHOULD, 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 to be adopted later in 2019 following consultation. 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 and other relevant statutory 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 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.

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 seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

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.

- 2.16 The relevant Development Plan framework for the study site is provided by the Richmond-upon-Thames Development Management Plan, adopted November 2011. Policy relevant to the site includes:

POLICY DM HD 4 ARCHAEOLOGICAL SITES  
THE COUNCIL WILL SEEK TO PROTECT, ENHANCE AND PROMOTE ARCHAEOLOGICAL HERITAGE (BOTH ABOVE AND BELOW GROUND), AND WILL ENCOURAGE ITS INTERPRETATION AND PRESENTATION TO THE PUBLIC. IT WILL TAKE THE NECESSARY MEASURES REQUIRED TO SAFEGUARD THE ARCHAEOLOGICAL REMAINS FOUND, AND REFUSE PLANNING PERMISSION WHERE PROPOSALS WOULD ADVERSELY AFFECT ARCHAEOLOGICAL REMAINS OR THEIR SETTING.

- 2.16 In terms of designated heritage assets as defined above in the NPPF, and as shown on Figure 2, no World Heritage Site, Scheduled Monuments, Historic Battlefield or Historic Wreck designations lie within, or in immediate proximity, to the site.
- 2.17 The site is partially (c. 75%) located within the Crane Valley Archaeological Priority Area (DLO33459) as designated by the London Borough of Richmond-upon-Thames.
- 2.18 This desk based assessment therefore aims to meet the national, strategic and local council policy and policy guidance as set out above, in clarifying the archaeological potential of the study sites and the need or otherwise for further mitigation measures.



### 3.0 GEOLOGY AND TOPOGRAPHY

#### 3.1 Geology

3.1.1 The solid geology of the study site is shown by the British Geological Survey (2016) as London Clay, forming the London Basin, overlain by superficial geological deposits of the Kempton Park Gravel Formation. The London Clay comprises Clay and Silt, the Kempton Gravel Formation comprises Sand and Gravel.

3.1.2 No geotechnical investigation has been undertaken on the site.

#### 3.2 Topography

3.2.1 The study site is approximately level at a height of approximately 9m Above Ordnance Datum (AOD). The site is completely developed with no original topography observed during the site visit (Plates 1 to 13).

3.2.2 The River Crane, canalised, forms the northern boundary of the study site. The River Thames lies approximately 1km to the south-east of the site.

#### 4.0 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND, WITH ASSESSEMENT OF SIGNIFICANCE

(Including Historic Map Regression exercise)

##### 4.1 Timescales used in this report:

###### Prehistoric

Palaeolithic	450,000	-	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	-	1749	
Modern	AD 1750	-	Present	

##### 4.2 Introduction

4.2.1 What follows comprises a review of archaeological findspots within a 1km radius of the study site, also referred to as the study area or search radius, 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 seventeenth century onwards until the present day.

4.2.2 In terms of designated heritage assets, as defined above and as shown on Figure 2, no designated Scheduled Ancient Monuments, Historic Wrecks or Historic Battlefields lie within the study area.

4.2.3 The site is located within the Crane Valley Archaeological Priority Area as designated by the London Borough of Richmond-upon-Thames. The APA (HER ref: DLO33459) covers the course of the River Crane which supported 18<sup>th</sup> century Oil and Paper Mills, a brewery and the manufacture of gunpowder. The APA is shaded blue on Figure 2).

- 4.2.4 APA ref DLO33460 is located to the south of the study site with its northern edge stopping on the south side of Edwin Road. The APA covers areas where evidence for the Early Medieval settlement of Twickenham and Marble Hill might be found.
- 4.2.5 In general the GLHER findspots within the study area are characterised by a scatter of Prehistoric finds, often found redeposited in association with the River Thames.
- 4.2.6 The map regression exercise and a review of documentary evidence and secondary sources demonstrate that the site remained undeveloped until the modern period. During the Post-Medieval period the site remained as open ground/agricultural land until the site was first developed in the early-20<sup>th</sup> century.
- 4.3 Prehistoric (Palaeolithic, Mesolithic, Neolithic, Bronze Age & Iron Age)
- 4.3.1 The earliest evidence for human activity recorded on the GLHER within the study area relates to the isolated recovery of a Palaeolithic flint flake (MLO11161, TQ 15 73). The artefact is given a very general grid reference and it is likely that the artefact has been redeposited within a secondary context.
- 4.3.2 Mammalian fossils, dated to the Palaeolithic period, are noted at TQ 15410 72993 (MLO103166) 225m south of the study site however, no evidence for human interaction was found at the location.
- 4.3.3 The fossilised bones of a deer are noted at TQ 16 73 (MLO13287) however these, along with a raft of other artefacts from various periods, are given a general grid reference for artefacts dredged from or retrieved from the banks of the River Thames.
- 4.3.4 Evidence for Mesolithic activity within the study area is limited to the recovery of a Mesolithic flint axe or adze found c550m to the south-west of the study site (MLO18273, TQ 1530 7270).
- 4.3.5 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.
- 4.3.6 A residual Neolithic flint adze have been found in the study area in the vicinity of the Thames foreshore 800m to the south-east (MLO19093, TQ 16 73).

- 4.3.7 By the 1<sup>st</sup> millennium, i.e. 1000 BC, the landscape was probably a mix of extensive tracts of open farmland, punctuated by earthwork burial and ceremonial monuments from distant generations, with settlements, ritual areas and defended locations reflecting an increasingly hierarchical society.
- 4.3.8 A number of Bronze Age artefacts have been recorded on the GLHER as deriving from the River Thames or its foreshore within the study area. The Bronze Age artefacts recovered consist of a flint knife (MLO3123, TQ 1615 7275), bone dagger (MLO11691, TQ 1770 7460) and a bronze sword (MLO3124, TQ 1610 7274).
- 4.3.9 A collection of Bronze Age artefacts is recorded under the generic grid reference TQ 16 73 all derived from the River Thames and its foreshore. The collection includes a bronze leaf shaped sword (MLO189610) and a bronze spearhead (MLO18967). Due to the location of their discovery such artefacts are likely to have been transported from their primary context by fluvial action.
- 4.3.10 No archaeological assets associated with the Iron Age period are recorded within the 1km search radius.
- 4.3.11 It is possible that the course of the River Crane may have been exploited throughout the prehistoric periods as a source of fresh water and flora and fauna along its banks. In the later prehistoric periods it is also possible that the lush grasses may have been exploited for seasonal grazing however due to the complete lack of evidence for Iron Age settlement this remains as a remote possibility. Seasonal use leaves very ephemeral traces on the landscape and aside from the occasional residual flint tool very little remains in the archaeological record. Such stray finds would be regarded as of local significance only.
- 4.3.12 Overall the potential of the study site for the Prehistoric period can be identified as low, although the presence of isolated artefacts from this period cannot be precluded. It is highly probable that throughout this period the focus of settlement would have been adjacent to the River Thames 1km to the south-east which provided a bountiful supply of fresh water and plenty of game.

#### 4.4 Roman

- 4.4.1 No evidence for either Roman settlement or transport routes is recorded within the 1km search radius. The nearest known Roman road is located c. 2.75km north of the study site.

4.4.2 The only evidence for Roman activity within the 1km search radius comprises a single coin found c700m to the south-west of the site (MLO19110, TQ 1510 7270).

4.4.3 Due to the distance of known Roman activity from the site, the archaeological potential of the study site for this period can be defined as generally low.

#### 4.5 Saxon and Medieval

4.5.1 The place name *Tuicanham* is noted in 704AD which translated means the river-bend lands of a man called Twicca. Twickenham is not mentioned in Domesday and no archaeological assets from the Saxon or early Medieval period are recorded within the 1km search radius. The potential for the Saxon period within the study site is considered to be low.

4.5.2 Within the 1km search radius no archaeological assets of Medieval date are recorded despite the Twickenham and Marble Hill APA being designated as providing evidence for **Early Medieval settlement. The APA's designation DLO33460 is presented as the orange shaded area on Figure 2.** The Whitton APA (DLO33470) located 1km north-west of the study site (shaded light blue on Figure 2) also marks the site of potential early medieval settlement.

4.5.3 The potential for the Medieval period can be identified as low at this time. Writers of the period describe the area as large expanses of countryside with large estates and landscaped gardens along the banks of the Thames.

#### 4.6 Post Medieval and Modern

4.6.1 The earliest map presented in this report, **Rocque's Map of Middlesex** (Figure 3, dated 1754) shows the study site located within open ground to the north-east of Twickenham Green. The study site is due south of the River Crane which at this time is not canalised and lies slightly further north than its present course.

4.6.2 **Roque's** Survey of the Cities of London (Figure 4, dated 1766) provides slightly more detail and identifies the site within meadows to the west of Stacon Lane.

4.6.3 The 1845 Twickenham Tithe Map (Figure 5) and associated Award identify the site within Market Gardens (Plots 326 and 328). The River Crane retains its natural channel to the

north of the site. Residential development has expanded eastward from Twickenham Green and a new road now forms the study sites southern boundary.

- 4.6.4 The layout of the site remains unaltered in 1866 (Figure 6, Ordnance Survey), the north-west portion of the site is planted out as either orchard or a hop field. The eastern part of the site is shown as open land with a central footpath running north to south through the field. The canalised River Crane now forms most of the study sites northern boundary with the newly constructed railway forming the remainder.
- 4.6.5 Bacons Map of Victorian London (Figure 7, dated 1888) depicts open land and shows residential development creeping toward the study site from the east.
- 4.6.6 GLHER records within the 1km search radius reference, predominantly, post-medieval and modern parks (MLO102892 at TQ 14809 73324), gardens (MLO104410 at TQ 15287 72947), cemeteries (MLO103978 at TQ 1617 7330) and sites of demolished country houses (**Gifford's** Lodge, MLO99306 at TQ 15433 72891 and Richmond House, MLO67375 at TQ 1624 7316).
- 4.6.7 Police called archaeologists after (ELO12988 at TQ 15182 72802) human bone was found in the garden of 20 Hampton Road (MLO105364). Comprising parts of 3 individuals with a skull evidencing craniotomy the bones are considered to be Post-medieval in date. As no hospital or morgue was ever constructed on this site it is assumed a student of medicine brought the bones to this location and disposed of them.
- 4.6.8 The 1898 Ordnance Survey (Figure 8) reverts to the same site use as shown in 1866. The field adjacent to the eastern boundary of the site contains a gravel pit.
- 4.6.9 The 1915 Ordnance Survey (Figure 9) shows the north-west part of the site developed. A building complex, of unknown function is identified midway along the eastern boundary of the eastern part of the site. In the intervening 17 years since publication of the 1898 survey the area to the east and west of the site has been infilled with residential properties. The current road layout has been established although Norcutt Road, to the east, is only half its current length and ends in a track leading to a laundry.
- 4.6.10 The 1934 Ordnance Survey identifies remodelling of some of the buildings in the north-west part of the site. In the eastern part of the site, adjacent to Edwin Road a laundry has been established. The remainder of this portion of the study site is annotated as Allotment Gardens (Figure 10).

- 4.6.11 By 1961 (Figure 11) the buildings in the north-west part of the site have been demolished and a bakery constructed over them. The footprint of the bakery extends into the eastern portion of the site. The laundry noted in 1934 remains in the southern part of the site which has been further developed with a works opposite and another building of unknown function constructed to the north. The layout of the site appears unaltered in 1973 (Figure 12) although there are some modifications within the central area.
- 4.6.12 Subsequent to the Ordnance Survey Map, dated 1973, the buildings in the north-west corner have again been remodelled including demolition of the building first observed in 1934 and its replacement with a larger building. The remainder of the site remains unchanged as shown on the Google Earth Views in 2003 and 2015 (Figures 13 and 14) and on the latest Ordnance Survey (Figure 15).
- 4.6.13 The archaeological potential for the Post-Medieval and Modern periods is solely invested in any remains of the buildings in the north-west part of the site, where not impacted by construction of the later bakery.

#### 4.7 Negative Evidence

- 4.7.1 Archaeological evaluations conducted within the search area, although not entirely negative, have only produced records for the late 18<sup>th</sup>, 19<sup>th</sup> and 20<sup>th</sup> centuries (ELO8607 at TQ 1543 7288, ELO13168 at TQ 1595 7363 and ELO15978).
- 4.7.2 An archaeological evaluation undertaken in July 2018 (ELO19008 at TQ 1567 7310) 300m south-east of the study site and located within the Twickenham and Marble Hill APA found no archaeological features or artefacts.

#### 4.8 Assessment of Significance

- 4.8.1 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.**
- 4.8.2 The assessment has identified no remains of non-designated heritage assets are located on the site.
- 4.8.3 The site is partly located within the Crane Valley Archaeological Priority Area as designated by the London Borough of Richmond-upon-Thames. The APA covers the

course of the River Crane which supported 18<sup>th</sup> century Oil and Paper Mills, a brewery and for the manufacture of gunpowder. The historical map regression exercise has demonstrated that no such structures existed on the site which remained undeveloped until the 20<sup>th</sup> century.

- 4.8.4 The assessment has identified a low potential for all periods of activity occurring within the site, with the balance of probability indicating that any features present will be of local importance. There is a high potential within the site for the modern period however, this relates solely to the sites use as a bakery.



## 5.0 SITE CONDITIONS AND THE PROPOSED DEVELOPMENT

(Review of potential impact upon Archaeological Assets)

### 5.1 Site Conditions

5.1.1 The site is currently occupied by a suite of buildings comprising the former Greggs Bakery, the site was taken over from Allied Bakeries in 1994. Access to the site is from Edwin Road (Plate 1), which formed the delivery and operational entrance, and via an entrance adjacent to 2 Gould Road (Plate 2). Gould Road was the entrance to the administration and reception blocks (Plates 2 to 5). The site is covered with hard standing throughout in areas not supporting buildings.

5.1.2 The hard standing leading from Edwin Road to the bakery is particularly robust as this was constructed to support the weight of vehicles delivering ingredients and vehicles transporting the finished products to the outlets (Plates 1, 12 and 13).

5.1.3 Within the site the buildings range in height from single storey to two or three storey brick buildings, the majority of which comprise the office and administration buildings in the north-west portion of the site. The study site also houses warehouses, cold storage areas and two flour silos (Plates 1 and 13) and a range of large commercial ovens arranged along the eastern edge of the main processing area (Plates 7 and 8).

5.1.4 The construction, and subsequent demolition, of the 20<sup>th</sup> century buildings within the north-west corner of the site will have had a severe localised negative impact on below ground archaeological deposits through the cycles of cutting foundations, grubbing out of foundations and the cutting of new foundations and insertion of services.

5.1.5 The multiple phases of construction within the site during the later 20<sup>th</sup> century will have had a further cumulative severe widespread negative impact on below ground archaeological deposits due to the cutting of additional foundations and services.

5.1.6 Agricultural/horticultural activity, prior to development, is likely to have had a low, but widespread, negative impact on below ground archaeological deposits.

### 5.2 The Proposed Development

5.2.1 The development proposals comprise demolition of all existing buildings on site except for 2 Gould Road (Plate 2), which is within the red line area, followed by the construction

of a residential development with no basements or underground car park proposed (Figure 16).

5.2.2 The residential properties have been sympathetically designed to blend in with the surrounding pattern of terraced streets. The main thoroughfare through the site, leading from Edwin Road, will be retained with terraced houses constructed either side (within the footprints of the existing buildings). The north-west corner of the site will contain three to four storey buildings overlooking the River Crane, these are largely constructed within the footprints of former buildings and are set back from the edge of the river.

### 5.3 Review of potential development upon Heritage Assets

5.3.1 **In view of the study site's** low archaeological potential and previous cycles of development, the proposed development is unlikely to have a widespread or substantial negative impact on below ground archaeological deposits.

5.3.2 The site is partly located within the Crane Valley Archaeological Priority Area as designated by the London Borough of Richmond-upon-Thames. The APA covers the course of the River Crane which supported 18<sup>th</sup> century Oil and Paper Mills, a brewery and the manufacture of gunpowder. The historical map regression exercise has demonstrated that no such structures existed on the site which remained undeveloped until the 20<sup>th</sup> century.

5.3.3 The site visit established that no archaeological structures predating the development of the site for a bakery were present.

5.3.4 However, due to the size of the site and its location within the APA, the London Borough of Richmond-upon-Thames's archaeological advisor at the Greater London Archaeological Advisory Service (GLAAS) may take a precautionary approach and require further archaeological mitigation measures in conjunction with the proposed development.

## 6.0 SUMMARY AND CONCLUSIONS

- 6.1 The site of Greggs Bakery, Gould Road, Twickenham, London has been reviewed for its below ground archaeological potential.
- 6.2 In accordance with central and local 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, Scheduled Monuments, Historic Battlefield or Historic Wreck Sites lie within the 1km search radius.
- 6.4 The site is partly located within the Crane Valley Archaeological Priority Area as designated by the London Borough of Richmond-upon-Thames. The APA covers the course of the River Crane which supported 18<sup>th</sup> century Oil and Paper Mills, a brewery and the manufacture of gunpowder. The historical map regression exercise has demonstrated that no such structures existed on the site which remained undeveloped until the 20<sup>th</sup> century.
- 6.5 The site is considered to have a low archaeological potential for remains associated with all periods of human activity.
- 6.6 Agricultural/horticultural activity, prior to development, is likely to have had a low, but widespread, negative impact on below ground archaeological deposits.
- 6.7 The site wide 20<sup>th</sup> century construction comprising the construction of the laundry and subsequent bakery within the site will have had a severe localised negative impact on below ground archaeological deposits due to the cutting of foundations and services.
- 6.8 The multiple phases of remodelling of the bakery buildings within the site throughout the 20<sup>th</sup> century can be considered to have had a further cumulative severe widespread negative impact on below ground archaeological deposits due to the cutting of additional foundations and services (Plates 1 to 13).
- 6.9 The development proposals comprise demolition of all existing buildings on site except for 2 Gould Road, followed by the construction of a residential development with no basements or underground car park.
- 6.10 On the basis of the available information, the GLHER, historical mapping, past developmental impacts and the proposed development design (largely within the existing

building footprints) we recommend that no further archaeological investigation is required on this site.

- 6.11 Due to the size of the site and its location within the APA, the London Borough of Richmond-upon-Thames's archaeological advisor at the Greater London Archaeological Advisory Service (GLAAS) may take a precautionary approach require further archaeological mitigation measures in conjunction with the proposed development.
- 6.12 If archaeological mitigation is required, this could be secured by a suitably worded condition attached to planning consent.

## SOURCES CONSULTED

### 1. General

British Library  
Greater London Historic Environment Record  
Richmond Local Studies Collection

### 2. Internet

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Department of Communities and Local Government *National Planning Policy Framework*  
2012

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February 2014 consultation draft (unpublished document)

Weinreb, B., Hibbert, C., Keay, J. & Keay, J. *The London Encyclopaedia* 2008

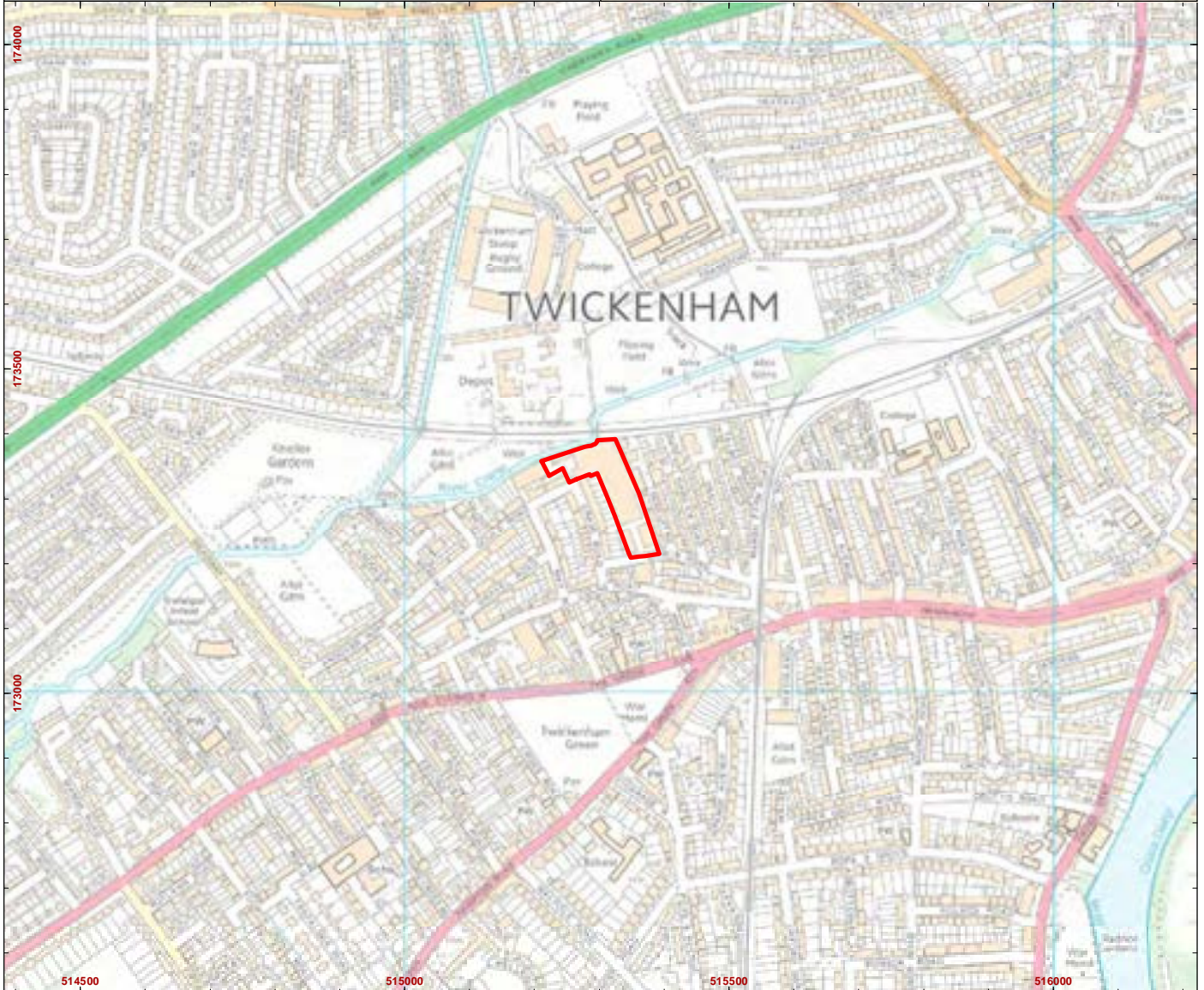
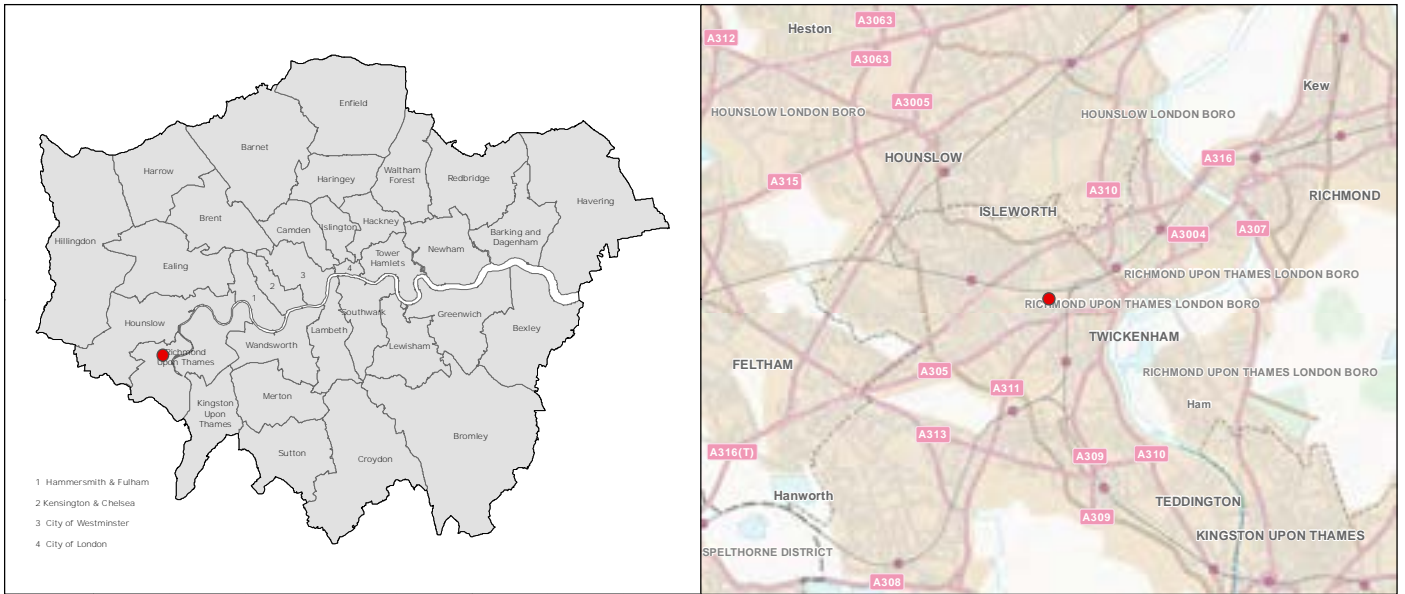
Wymer *The Lower Palaeolithic Occupation of Britain* 2 volumes 1999

Victoria County History *Surrey Volume 3* 1911

### 4. Cartographic

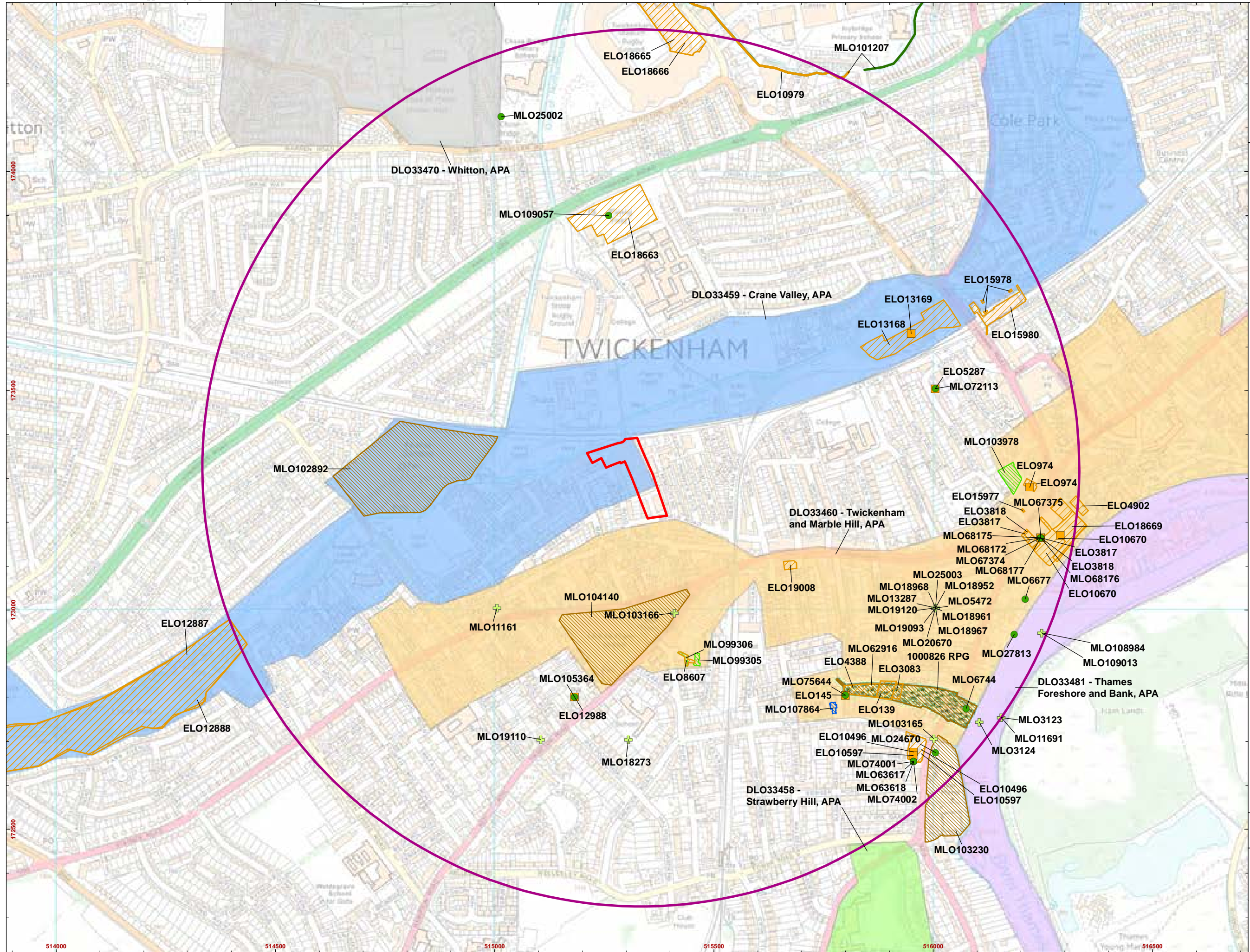
1635 Glover  
1754 Rocque  
1766 Rocque  
1804 Ordnance Survey Drawing  
1819 Denton  
1845 Twickenham Tithe Map

1879 Ordnance Survey  
1896 Ordnance Survey  
1915 Ordnance Survey  
1935 Ordnance Survey  
1960 Ordnance Survey  
1973 Ordnance Survey  
2003 Google Earth View  
2015 Google Earth View



<p>Scale at A4: 1:10,000</p> <p>0 250m</p>	<p><b>Cgms</b> HERITAGE PART OF RPS</p>	<p>Figure 1: Site Location</p>
<p>© Ordnance Survey maps reproduced with the sanction of the controller of HM Stationary Office. Licence No: AL 100014723 Contains Ordnance Survey data © Crown copyright and database right [2017]</p>		





Site Boundary

Search Radius 1km

Designated Assets:

Archaeological Priority Area

DLO33458 - Strawberry Hill

DLO33459 - Crane Valley

DLO33460 - Twickenham and Marble Hill

DLO33470 - Whitton

DLO33481 - Thames Foreshore and Bank

Registered Park and Garden

Non-Designated Assets:

HER Record (Point)

Find Spot

Monument

HER Record (Linear)

Monument

HER Record (Polygon)

Building

Monument

Park

Previous Archaeological Work:

Event Record (Point)

Event Record (Linear)

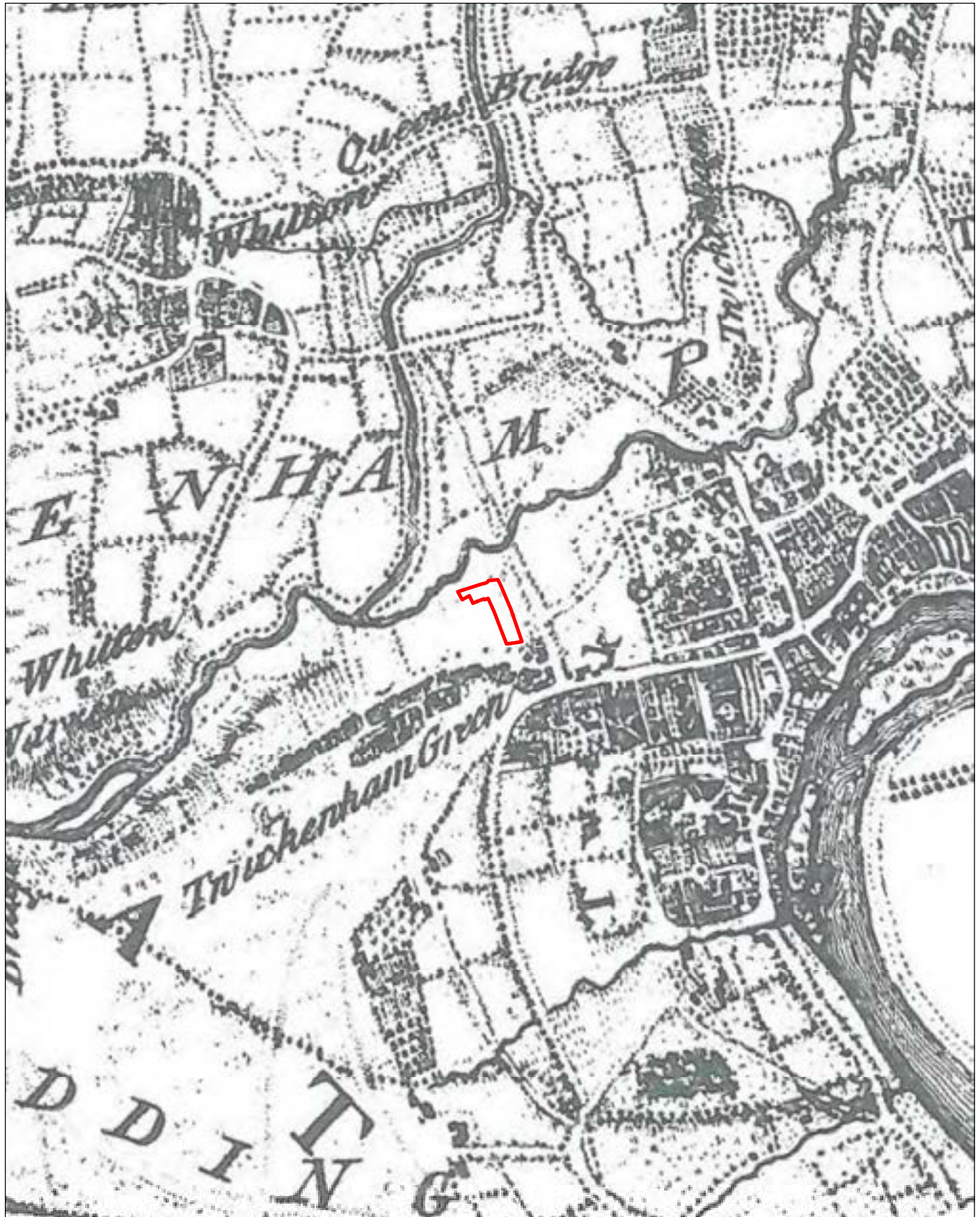
Event Record (Polygon)



Scale at A3: 1:8,000  
0 250m

Figure 2:  
HER Plot  
(data fom GLHER)





 Approximate Site Location

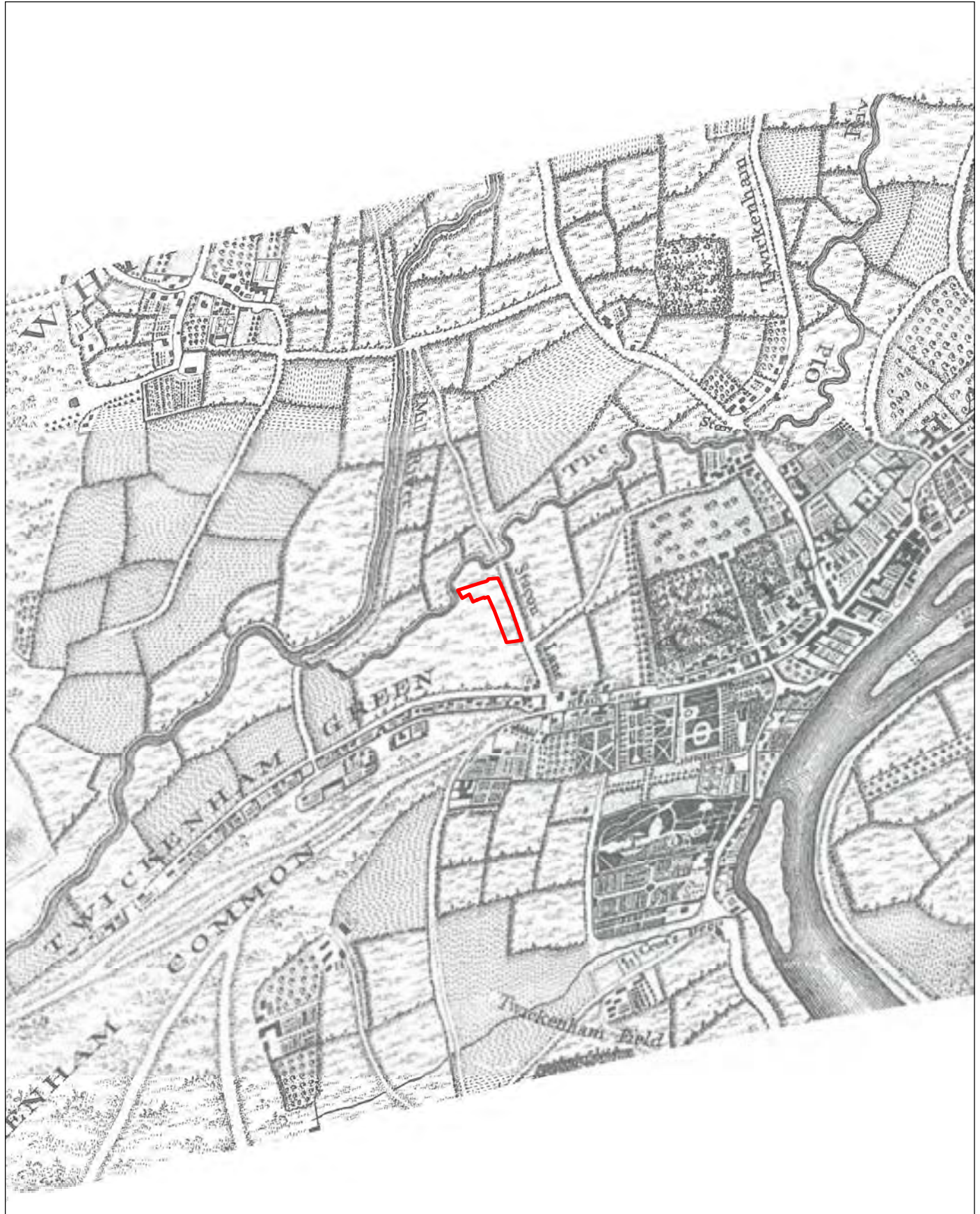


Scale at A4: 1:15,000



Figure 3:  
1754 Rocque Map of  
Middlesex





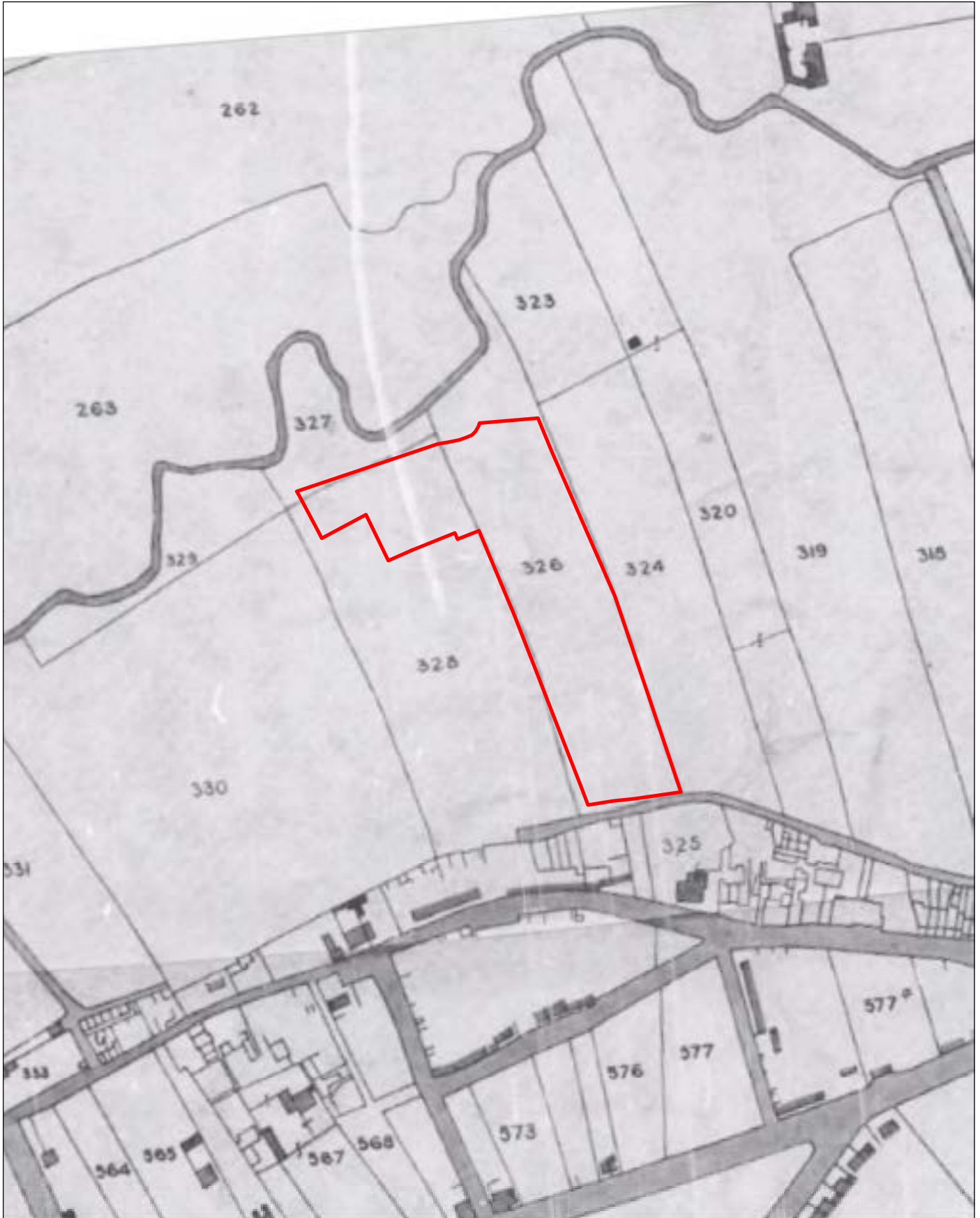
 Approximate Site Location




Scale at A4: 1:15,000



Figure 4:  
1766 Rocque Survey of  
the Cities of London



 Approximate Site Location

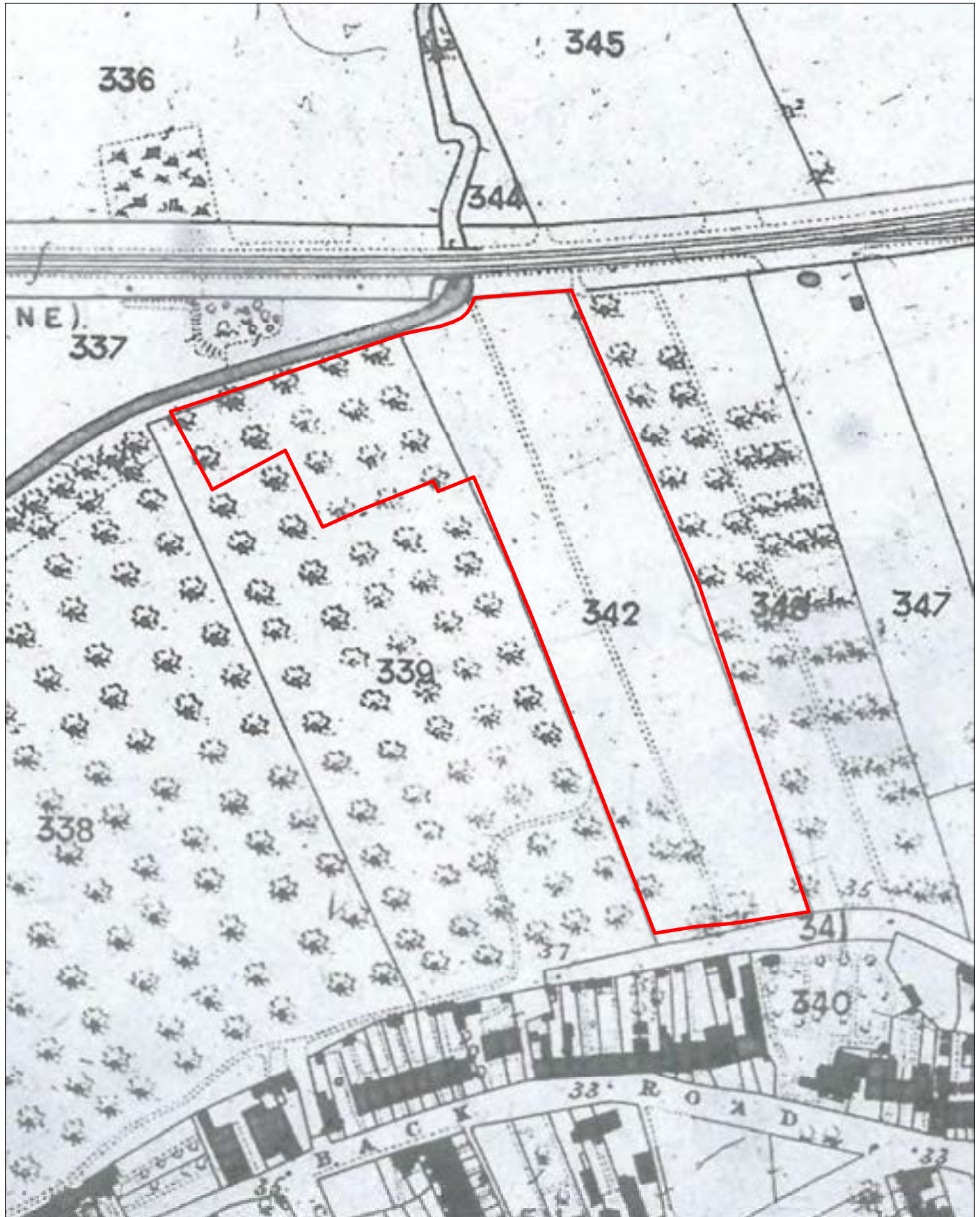



Scale at A4: 1:2,500



Figure 5:  
1845 Twickenham Tithe  
Map





 Site Boundary



Scale at A4: 1:1,500



Figure 6:  
1866 Ordnance Survey



 Site Boundary

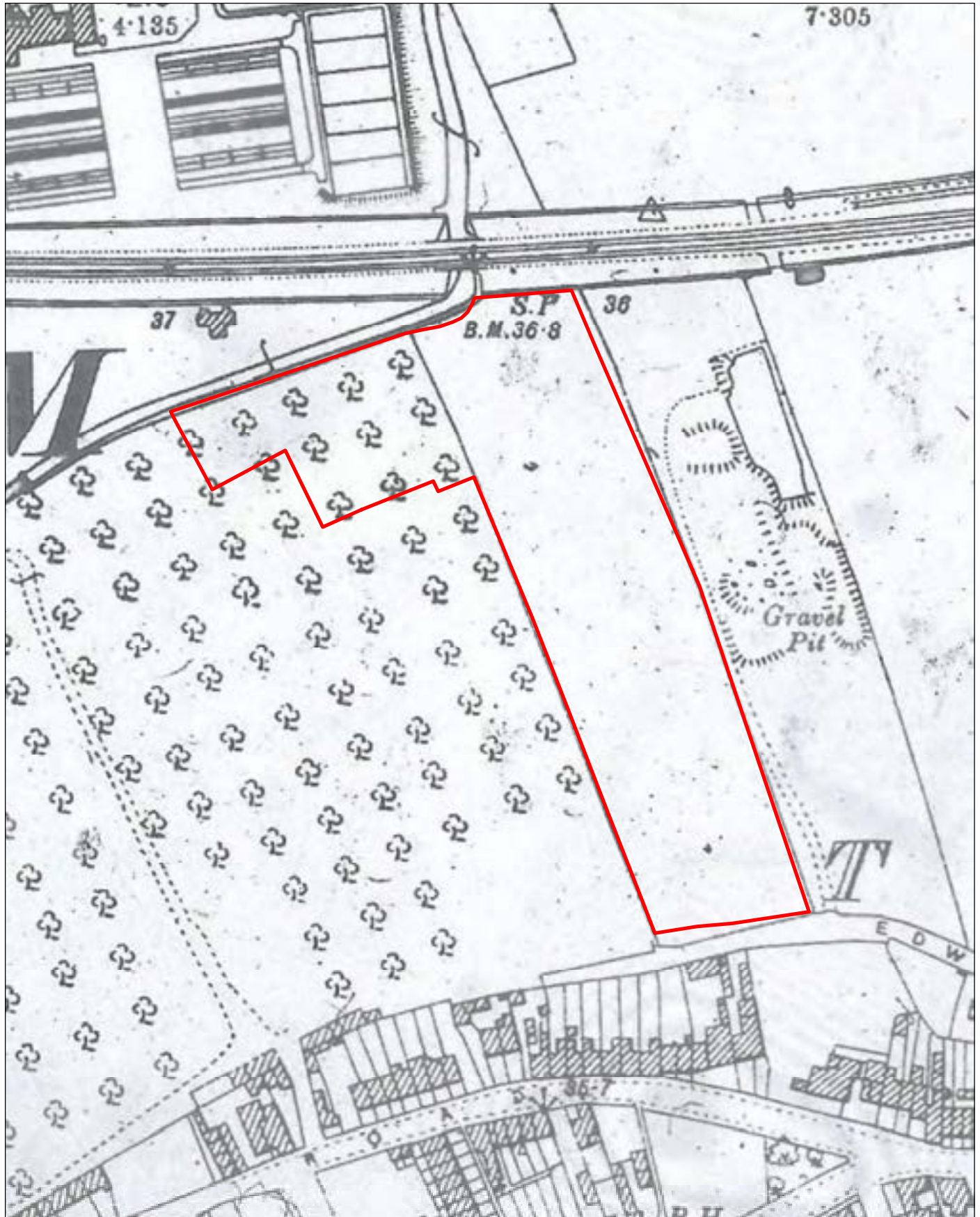



Scale at A4: 1:2,500



Figure 7:  
1888 Bacon (A – Z of  
Victorian London)





 Site Boundary




Scale at A4: 1:1,500



Figure 8:  
1898 Ordnance Survey





 Site Boundary




Scale at A4: 1:1,500



Figure 9:  
1915 Ordnance Survey





 Site Boundary




Scale at A4: 1:1,500



Figure 10:  
1934 Ordnance Survey





 Site Boundary



Scale at A4: 1:1,500



Figure 11:  
1961 Ordnance Survey



 Site Boundary




Scale at A4: 1:1,500



Figure 12:  
1973 Ordnance Survey





 Site Boundary



Scale at A4: 1:1,500



Figure 13:  
2003 Google Earth View



 Site Boundary




Scale at A4: 1:1,500



Figure 14:  
2015 Google Earth View





 Site Boundary



Scale at A4: 1:1,500



Figure 15:  
Site as Existing



ground floor plan

 Site Boundary



Scale at A4: 1:1,500



Figure 16:  
Proposed Development





Plate 1: Edwin Road entrance viewed North with flour silo's mid distance.



Plate 2: Gould Road entrance looking North with 2 Gould Road West of the gates.



Plate 3: Gould Road administration block viewed from south-west.



Plate 4: Gould Road northern range of administration buildings viewed from the south.  
Canalized River Crane immediately behind.





Plate 5: Gould Road office parking viewed East to West.



Plate 6: Main processing plant western half viewed North to South.



Plate 7: Main processing building eastern half viewed North to South.



Plate 8: Oven rank along eastern edge of the site viewed from the north-west.





Plate 9: River frontage viewed from the east to west. River crane immediately north of the fence line.



Plate 10: Eastern site boundary viewed North to South with residential properties along Norcutt Road to the East.



Plate 11: Eastern Site boundary viewed South to North.



Plate 12: Edwin Road loading bays viewed from the South.



Plate 13: Northern flour Silo viewed from the North.