

102-104 KEW ROAD, RICHMOND, SURREY

(NGR TQ 18351 75515)

## Heritage Statement

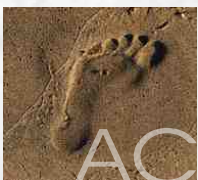
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Prepared by:  
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On behalf of:  
Four Regions Restaurant

Document No: ACD2248/1/1

Date: April 2020



AC archaeology

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## Heritage Statement

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The views and recommendations expressed in this report are those of AC archaeology and are presented in good faith on the basis of professional judgement and on information currently available.

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## Summary

*A Heritage Statement was prepared by AC archaeology in April 2020 on behalf of the Four Regions Restaurant to support a planning application for internal and external alterations, including an extension, to 102-104 Kew Road, Richmond, Surrey TW9 2PQ (NGR TQ 18351 75515).*

*The property has its origins as a pair of late 19th- or early 20th-century mixed-use (commercial and residential) buildings forming part of a wider contemporary terrace. It is located within the Kew Foot Road Conservation Area, and has been classified as a Building of Townscape Merit. It is also located within the buffer zone of the Royal Botanic Gardens, Kew World Heritage Site.*

*The majority of the works replicate a scheme consented in 2019 (planning reference 19/2300/FUL), but it also now includes an extension at the rear of the property. An assessment of potential impact on the significance (special interest) of the Kew Foot Road Conservation Area and the Outstanding Universal Value of the Royal Botanic Gardens, Kew World Heritage Site has been undertaken, and **no change** to either is predicted.*

*The scheme has been designed in accordance with the 'strategic vision' for the Borough, and the 'strategic objectives' relating to 'protecting local character'. It also complies with the National Planning Policy Framework, and policies LP1-LP4 and LP6 of the Local Plan, as well as positively contributing to the proposals for management of the Kew Foot Road Conservation Area, as set out in its Conservation Area Study.*

### 1. INTRODUCTION (Fig. 1)

- 1.1 This Heritage Statement has been prepared by AC archaeology in April 2020 on behalf of the Four Regions Restaurant to support a planning application for internal and external alterations to 102-104 Kew Road, Richmond, Surrey TW9 2PQ (NGR TQ 18351 75515; Fig. 1).
- 1.2 102-104 Kew Road is a late Victorian/early Edwardian pair of commercial properties with residential accommodation above, forming part of a longer terrace of commercial buildings along the southeast side of Kew Road (the A307), between Evelyn Gardens to the south and Selwyn Avenue to the north. It is situated on flat ground at a height of around 6.7m above Ordnance Datum. The property is not designated as a Listed Building but it is situated within the Kew Foot Road Conservation Area, which encompasses 18th- and 19th-century residential developments at the south end of Kew Road (north of its junction with Twickenham Road and Mortlake Road) and to the west between Kew Road and Kew Foot Road (and includes the parade of commercial properties at the south end of Kew Road). It is also situated within the 'buffer zone' of the Royal Botanic Gardens, Kew World Heritage Site; the nearest part of the World Heritage Site is located 550m to the northeast.
- 1.3 The underlying geology consists of Palaeogene clay and silt of the London Clay Formation overlain by Quaternary sand and gravel of the Kempton Park Gravel Member (British Geological Survey online viewer 2020).

### **The Scheme**

- 1.4 The scheme retains the ground floor in commercial use (but with a new access to the first floor), with the conversion of the upper floors into three one-bedroom flats and four studio flats. There are three units on each of the first and second floors, with accommodation extended out into an infill block, between the outriggers and over the existing infill at ground-floor level. The seventh unit will be in the roof space that is currently unused.

### **Planning History**

- 1.5 Two recent (2019) planning applications for the property are relevant to this scheme. The first application (London Borough of Richmond Upon Thames Planning reference 19/0740/FUL) was for the conversion of the upper floors into seven studio flats with associated changes to the commercial property on the ground floor (and associated external features). This scheme was refused on two grounds, one of which was heritage based, relating to 'Harm to Conservation Area'.
- 1.6 A revised application for the same proposals (London Borough of Richmond Upon Thames Planning reference 19/2300/FUL) addressed the heritage concerns of the previous application, and was granted consent. This scheme has not been implemented.

## **2. PLANNING POLICY AND GUIDANCE (Appendix 1)**

### **Statutory**

- 2.1 A mission statement, vision, and associated policies and action plan for the management of the Royal Botanic Gardens, Kew World Heritage Site are set out within parts 3 and 4 of the *Management Plan* (Gross. Max. Landscape Architects 2014). The document includes the following policy relating to the setting of the World Heritage Site:

*Policy 1d - Development which would impact adversely on the WHS, its Outstanding Universal Value or its setting should not be permitted.*

- 2.2 Conservation Areas are protected under the *Planning (Listed Buildings and Conservation Areas) Act 1990*. Section 72 of the Act requires 'that in the exercise, with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

### **National and Local Planning Policy and Guidance**

- 2.3 National planning policy is set out in the *National Planning Policy Framework* (NPPF; Ministry of Housing, Communities and Local Government 2019a). The relevant policies are contained within Chapter 16 and are included within Appendix 1.
- 2.4 There is a raft of local planning policy and guidance documents prepared by the London Borough of Richmond. Relevant policies and guidance from the following documents are set out in Appendix 1:

- *Local Plan, 2018;*
- *Richmond and Richmond Hill Village Planning Guidance, 2018;*
- *Planning Information for Conservation Areas, 2012;*
- *Supplementary Planning Document Buildings of Townscape Merit, 2015;*

- *Conservation Area Study Kew Foot Road no. 36 & Sheendale Road no. 50, 2007*; and
- *Kew Foot Road Conservation Area 36, 2007*.

### 3. AIM AND METHODOLOGY

3.1 The aim of the document was to prepare an assessment of impact, whether positive or negative, of the proposed development on relevant heritage assets, specifically the Kew Foot Road Conservation Area and the Royal Botanic Gardens, Kew World Heritage Site.

#### **Assessment of Significance**

3.2 Advice on the criteria to be used in assessing the significance of heritage assets is included in Historic England's *Managing Significance in Decision-Taking in the Historic Environment*, *Historic Environment Good Practice Advice in Planning: 2* (2015) and *Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12* (2019), as well as the earlier English Heritage guidance *Conservation Principles – Policies and guidance for the sustainable management of the historic environment* (English Heritage 2008). This guidance states that heritage assets are considered to have significance based on their evidential, historical, aesthetic or communal value. The NPPF also includes the criteria of archaeological, architectural and artistic value, and states that setting can also contribute to an asset's significance.

3.3 In addition to the above documents Historic England's *The Setting of Heritage Assets*, *Historic Environment Good Practice Advice in Planning: 3* (Historic England 2017) and the NPPF *Planning Practice Guidance* (Ministry of Housing, Communities & Local Government 2019b) have been used to assess the contribution of setting to significance.

3.4 Together *Conservation Principles* and *Managing Significance in Decision-Taking in the Historic Environment*, *Historic Environment Good Practice Advice in Planning: 2* identify the need (a) to understand the importance of heritage values, (b) to understand the level of significance (of an asset), and (c) for an assessment of the impact on significance; the latter two are requirements of the NPPF. However, neither document provides a methodology for the ranking in these assessments. This heritage statement therefore expresses the results of the assessment of significance of an asset using a scale of significance derived from Volume 11, Section 2 of the *Design Manual for Roads and Bridges* (Highways England 2019) and from guidance provided by the International Council on Monuments and Sites (ICOMOS 2011). An understanding of the relative significance of heritage assets is important because of the issue of proportionality expressed in Paragraphs 189, 190, 193, 194 and 197 of the NPPF. The ranking is presented in Table 1 below.

SIGNIFICANCE (VALUE)	FACTORS FOR RANKING THE SIGNIFICANCE OF HERITAGE ASSETS
Very High	World Heritage Sites (including nominated sites) Assets of acknowledged international importance Assets that can contribute significantly to acknowledged international research objectives Assets with exceptional heritage values
High	Scheduled Monuments (including proposed sites) Grade I and II* Listed Buildings Grade I and II* Registered Parks and Gardens Undesignated heritage assets of schedulable or exceptional quality and importance Conservation Areas containing very important buildings Assets that can contribute significantly to acknowledged national research objectives Assets with high heritage values
Medium	Designated or undesignated assets that have exceptional qualities or contribute to regional research objectives Grade II Listed Buildings Conservation Areas containing important buildings Grade II Registered Parks and Gardens Assets with moderate heritage values
Low	Designated and undesignated heritage assets of local importance Assets compromised by poor preservation and/or poor survival of contextual associations Assets of limited value, but with potential to contribute to local research objectives Assets with low heritage values
Negligible	Assets with very little or no surviving archaeological, architectural or historical interest Assets with minimal heritage values
Unknown	The importance of the asset has not been ascertained

Table 1: Ranking of significance

### Assessment of Effects on Significance

- 3.5** In the absence of a standard terminology for the scale of effects on heritage assets the magnitude of change is expressed using a five-point scale of impacts, whether negative or beneficial, based on the *Design Manual for Roads and Bridges* and guidance from ICOMOS (Table 2).

DEGREE OF CHANGE	FACTORS AFFECTING CHANGE
Major	Change in evidential, architectural, historical, artistic, aesthetic or communal value, or setting, of the heritage asset such that the significance of the resource is totally altered
Moderate	Change in evidential, architectural, historical, artistic, aesthetic or communal value, or setting, of the heritage asset such that the significance of the resource is substantially modified
Minor	Change in evidential, architectural, historical, artistic, aesthetic or communal value, or setting, of the heritage asset such that the significance of the resource is slightly altered
Negligible	Change in evidential, architectural, historical, artistic, aesthetic or communal value, or setting, of the heritage asset such that the change in significance of the resource is barely perceptible
No Change	Change in evidential, architectural, historical, artistic, aesthetic or communal value, or setting, of the heritage asset such that the significance of the resource is not altered.

Table 2: Assessment of effects on significance

### General Methodology

- 3.6** The heritage statement was prepared during March and April 2020 at a time when travel restrictions, issued by the UK Government, were in place during the outbreak

of Covid-19. There was therefore no opportunity for a site visit, and local repositories (such as the Richmond Record Office) were temporarily closed.

- 3.7 A rapid desk-based appraisal was undertaken. This comprised an assessment of the relevant historic maps, published and unpublished sources, and other data held online, as well as photographs and information on the property provided by the client's agent.

#### 4. 102-104 KEW ROAD

##### Historical Background

- 4.1 The origins of Kew relate to a ferry across the River Thames to the northwest of Richmond (London Borough of Richmond Upon Thames 2007a), the name being a derivation of a 'quay' on the watercourse. The ferry had medieval origins and was first replaced by a bridge in 1759. It was connected to Richmond by a track, Love Lane, which partially survives in the current streetscape as Kew Foot Road. The track was closed by George III in 1766 to allow the uniting of the gardens of the royal palace of Richmond Lodge with the new palace at Kew. It was replaced by a new road, the present Kew Road, funded by the King.
- 4.2 Within the Kew Foot Road Conservation Area Georgian development was limited, mainly located on Kew Foot Road overlooking the Old Deer Park to the west, and the adjacent St John's Road.
- 4.3 The remainder of the Conservation Area has a built environment of mainly Victorian and Edwardian date, including rows of terrace houses between Kew Road and Kew Foot Road. In general, there is a pattern of earlier buildings to the southwest (closest to the historic core of Richmond) with those of a later date to the northeast as the settlement expanded onto previously undeveloped agricultural land. The 'Pagoda Triangle' to the west was, for example, constructed in the late 1890s on the site of the demolished villa *Pagoda House*, although the associated roads (of Selwyn Avenue and Beaumont Avenue) had already been laid out by 1893, when a terrace of houses had been constructed along the south side of Selwyn Avenue.
- 4.4 102-104 Kew Road forms part of a terrace between Evelyn Gardens to the south and Selwyn Avenue to the north. The terrace, along with the cul-de-sac of Evelyn gardens, had not been constructed by 1893, when the 1895 1:1056 Ordnance Survey map of the area was surveyed. The map only shows a pair of attached enclosed spaces at the junction of Selwyn Avenue with Kew Road.
- 4.5 The terrace, and Evelyn Gardens, had been constructed by 1910, the revision date of the 1913 1:2,500 Ordnance Survey map. The map shows three pairs of properties (102-104, 106-108, and 110-112) with rear outriggers extending into small rear yards, all served by an alley from Selwyn Avenue. The southern three buildings of the terrace were longer, with no outriggers, extending to the rear line of the outriggers of the other buildings; they had smaller yards. All the buildings fronted straight onto the wide pavement of Kew Road; none had rear gardens, with the rear alley and yards forming the boundary with the end properties on Selwyn Avenue and Evelyn Gardens.

##### 102-104 Kew Road

- 4.6 The property is three storeyed with a basement, and has commercial use on the ground floor and basement, and two floors of accommodation above; the roof space is currently unused. The ground floor is occupied by the Four Regions Restaurant,



and extends over both historic properties. The shop front reflects this internal arrangement, but the fenestration and overall design respects the historic form as two properties.

- 4.7 The building is constructed from red brick (left exposed) with yellow brick used in the rear elevations (also exposed), under pitched ceramic tiles roofs. In the front elevation, in each historic property, one of the first-floor windows is a projecting square bay, whilst the heads of the second-floor windows, which are of two sizes, are set within pitched dormers; the larger window has a small balcony over the bay window below. These features are also present in the adjacent 106-108, and in part within 110-112 at the north end of the terrace. At the rear of the property there are windows and doorways in the rear elevation of the house, and in the side and rear walls of the outriggers; at second-floor level the windows in the main rear elevation are partly within flat-roofed dormers. Attached to these elevations are commercial vents, residential extractors, and drainpipes, and satellite dishes; these, along with a fire escape, are fittings present on the rear of other properties within this terrace. At ground-floor level the yard between the outriggers has been enclosed, and there are further extensions to the rear, taking up most of the original yard. This area is accessed via a service alley from Selwyn Avenue.
- 4.8 Internally, the ground floor is largely a single open space, with a small kitchen and customer toilets at the rear of 102, including within the rear extensions. Apart from piers and lengths of rear walls, retained as structural elements, the internal walls between the two properties, and along with internal partitions have been removed. The basement contains the main kitchen for the restaurant, along with additional seating space. It is accessed from the ground floor, and from the rear yard. Although now accessed externally, from the rear, layouts of the first and second floors remain largely intact, albeit updated, and with some alteration, and now, as with parts of the exterior, in a poor condition.

## 5. ASSESSMENT OF IMPACT ON THE KEW FOOT ROAD CONSERVATION AREA

- 5.1 The special interests of Conservation Areas are derived from the collective heritage values and cohesive historical integrity of the assets within them, and the overall preservation of the historic (and aesthetic) character of the area. The Kew Foot Road Conservation Area was designated in 1982 and covers an area of c. 9ha encompassing 18th- 19th-, and early 20-century residential developments and a shopping parade at the south end of Kew Road (north of its junction with Twickenham Road and Mortlake Road) and to the west between Kew Road and Kew Foot Road. The Conservation Area is considered to be an asset of **medium significance** based upon its special interest which is discussed below.
- 5.2 The following statement of special interest is set out in the *Conservation Area Study* (London Borough of Richmond Upon Thames 2007a, 4).

*Kew Foot Road itself is a historic link between Richmond and Kew and contains several listed buildings, many buildings of townscape merit and an attractive series of spaces. Between Kew Road and Kew Foot Road are four streets of Victorian houses notable for their variety of size and style, all linked by a high quality of townscape.*

*Kew Foot Road is of a smaller scale and more peaceful than its parallel neighbour, Kew Road. Terraces of charming residential development of many different types and styles have filled the space remaining between the two lines of road frontage developments. Old narrow alleys lead off the main roads and the whole area is densely populated with a mixture of grand Georgian terraces, large detached and semi-detached townhouses, and tiny Victorian*

*artisans' cottages. Several old path lines survive, including Michel's Row and Blue Anchor Alley.*

*Kew Foot Road forms part of the setting of the adjacent historic Old Deer Park, and its development should be considered together with the history of the park. The historic wall and gateway to the west of the road appears to date from the early C18. Important buildings include 19-23 (odds) Kew Foot Road, a trio of fine Queen Anne period terraced houses with elaborate carved door cases. Other buildings of note making up a composite group of variety and quality are The Gothic Cottages in Kew Foot Road, and the Royal Hospital with its C19 and C20 extensions clustered around a handsome five bay C18 house. The modest but charming individual houses in St. John's Grove also continue the C18 pattern of development.*

*Side roads are principally of two-storey terraced or semidetached houses with shallow pitch slate roofs unencumbered by roof extensions. Mixed yellow stock brick with red brick details are the dominant materials in the area.*

*The southern end of Kew Road forms a busy and unusual continental environment of three-storey Victorian buildings with shops, offices and restaurants below and residential accommodation above. There are cafés with tables and chairs on the wide pavements and brightly painted shops and houses under a canopy of mature plane trees.*

- 5.3** It is noticeable from this statement, and from the overall tone of the *Conservation Area Study*, that the emphasis is on Kew Foot Road, and the overall development of the area. There are few Listed buildings, all but one being townhouses located on Kew Foot Road and St John's Grove. Other Georgian and Victorian houses and commercial properties are identified as Buildings of Townscape Merit, whilst individual buildings within later (mainly early 20th-century) residential developments generally do not contribute towards its special interest.
- 5.4** A small number of views are identified in the *Conservation Area Study* as contributing towards its special interest: the view northeast along Kew Foot Road, the view northwest from the Royal Hospital over the Old Deer Park, and the view up and down Shaftesbury Avenue. The tree-lined commercial south end of Kew Road provides contrasting townscape views to the mainly terraced residential streets within the Conservation Area. The setting of the Conservation Area (including any views into the designated area from its setting where its character can be appreciated) is not identified within the *Conservation Area Study* as contributing towards its special interest, and this is only mentioned in relation to Kew Foot Road being part of the setting of the adjacent Old Deer Park.

#### **Assessment of Impact**

- 5.5** The scheme is for a single property within the Conservation Area, that is characterised as a Building of Townscape Merit; this raises the significance of the building higher than other non-designated heritage assets, but not to the level of a designated heritage asset.
- 5.6** The proposal retains the current part commercial – restaurant – and part residential use of the building. Other than an insignificant reduction in floorspace (see below) no change to the former use is sought. This mixed use is identified as contributing towards the special interest of the Conservation Area, and the retention of the dual use of the property accords positively with proposal 1 in the *Conservation Area Study*. The change to the ground floor involves the installation of a new passage and staircase (and the associated alteration to the shop front to allow for a new doorway) to serve the upper floor units. The staircase (within the historic 104) is in its original position as evidenced by the position of the staircases on the upper floors, and reinstatement of these features is a benefit to the character of the

building. The changes to the shop front will reflect the historic nature and mixed-use of these buildings (as present in other shop fronts for example historically identical 106 and 108 Kew Road, 98 and 100 Kew Road, and other commercial properties further to the south along this highway. The opening fits in well with the existing fenestration of the shop front, and accords with proposal 10 in the *Conservation Area Study*. This change to the shop front has previously been approved under application 19/2300/FUL.

- 5.7** The building is in a poor condition, with the upper floors currently underused. The current scheme intends to provide a long-term secure future for the building; the number of changes of use applications (both granted and refused) for adjacent and similar properties within the Conservation Area testifies to the volatile commercial environment of the area. In this respect the full use of the upper floors of the buildings provides a long-term investment to secure (and maintain) the future of the building. In addition to the conversion, the scheme also includes repairs and general updating including to the roof, electrics and plumbing. This accords positively with policy LP4 in the *Local Plan*, whereby a Building of Townscape Merit is preserved, and proposal 5 in the *Conservation Area Study* of reusing/converting existing larger historic properties (rather than putting forward a scheme for redevelopment).
- 5.8** The internal alterations are almost identical to the consented scheme approved under application 19/2300/FUL, with minor changes to the design at the rear of the building relating to the new extension. The alterations at roof level (to the main block and rear outriggers) are also identical to the consented scheme approved under application 19/2300/FUL.
- 5.9** The scheme includes a new rear extension between the outriggers. As with the other properties in this terrace with outriggers, 102 and 104 have an existing ground-floor extension infilling the rear yard between these wings. The new extension will be two storeyed and located on top of this existing extension. The extension has a flat roof, and as with the outriggers it will sit lower than the eaves level of the main front block. Due to the sloping nature of the outrigger roofs, the associated historic chimney stacks being set towards the outside of the current property, and the retention of the upper parts of the rear modern windows, the new extension has the feel of being lower than the existing building making it appear subservient. The extension will be constructed of brick and have window forms matching the current styles and reflecting the sizes of the current openings. Like-for-like replacement of original windows in the yard elevation has been approved within application 19/2300/FUL, and therefore their loss as part of the current scheme is not considered to cause harm.
- 5.10** In a local context, although of small size (in relation to both the current property and the wider terrace), this new extension represents a big change to the property. However, in previous applications at the property planners have stated that the rear elevations (of the terrace) are 'largely functional in appearance', and changes can be made (and have been granted permission across the terrace) that do not harm the special interest of the Conservation Area. This is reflected in the *Conservation Area Study* which only identifies the grounds around Christ Church as an area of rear garden (or yard) that contributes towards its special interest. Although the document does not dismiss rear elevations as being unimportant, it does highlight these as being areas suitable for change (such as the addition of dormer windows) instead of harmful alterations to front elevations.

- 5.11** Whilst the scheme includes external changes to a single property within the Conservation Area, it does not change or harm any element of its special interest relating to Kew Road, such as the mixed use of buildings, the outside social spaces along the highway, and the wider tree-lined streetscape. Additionally, the extension does not feature in or harm any of the key views within the Conservation Area. The extension may be visible from private properties on Selwyn Terrace and Evelyn Gardens, but due to the tight townscape development along these streets, it will be barely visible from publicly accessible areas. In the glimpsed view from Evelyn Gardens, the white painted rendered rear elevations of 96-100 Kew Road (which fully extend to three storeys) are more prominent in the foreground, and the extension will be largely obscured by the ground-floor extensions to these properties. These views are not considered to contribute towards the special interest of the Conservation Area (see Section 5.4 above).
- 5.12** In conclusion, the scheme is for alterations to a single property, a Building of Townscape Merit, within the Conservation Area. The majority of the works replicate a scheme consented in 2019, but the new rear extension is a new proposal. This will change the external character of the rear of the building, as with the rest of the terrace currently a utilitarian area that does not contribute towards the special interest of the Conservation Area. The scheme does not harm any element of special interest of the Conservation Area (as set out in Section 5.2 above), in particular the streetscape of Kew Road. Therefore, it is concluded that the scheme will cause **no change** to the special interest or significance of the Kew Foot Road Conservation Area.

## **6. ASSESSMENT OF IMPACT ON THE ROYAL BOTANIC GARDENS, KEW WORLD HERITAGE SITE**

- 6.1** The Royal Botanic Gardens, Kew World Heritage Site was inscribed by UNESCO in 2003 (Id. No. 1084) and covers 132ha of gardens and associated buildings located adjacent to the River Thames at the north end of the Borough of Richmond. It is a heritage asset of **very high significance** based on its Outstanding Universal Value (OUV), which has been summarised as follows (Gross. Max. Landscape Architects 2014, 58-59; see also National Heritage List for England entry 1000102):

### **3.8 Attributes of Outstanding Universal Value of the WHS**

*3.8.1 The different categories of attributes which contribute to the Outstanding Universal Value of Kew are:*

- *a rich and diverse historic cultural landscape providing a palimpsest of landscape design*
- *an iconic architectural legacy including the Palm house, the Temperate House and modern additions such as Princess of Wales Conservatory*
- *globally important preserved and living plant collections*
- *a horticultural heritage of keynote species and collections*
- *key contributions to developments in plant science and plant taxonomy.*

*3.8.2 Key attributes contributing to the OUV of the WHS **rich and diverse historic landscape** include:*

- *Relationship with River Thames and wider Arcadian landscape beyond.*
- *The Victorian garden lay-out designed as collaboration of Sir William Hooker, William Nesfield and Decimus Burton.*
- *Remaining aspects of William Chambers 'Anglo-Chinese' garden style.*
- *Remaining aspect of Capability Brown landscape incl. plantations, landform and ha-ha connection to river.*

- Archaeological remains of former Charles Bridgeman and William Kent landscapes structures.
- A series of key vistas.

3.8.3 Key attributes contributing to the OUV of the WHS **iconic architectural legacy** include:

- A series of iconic glasshouses, most still in original use, representing key developments in the design and construction of glasshouses throughout history
- A range of garden buildings and structures such as temples, follies, gates and ha-ha as integral part of the designed landscape.
- Royal residency and patronage of the gardens as evidenced in Kew Palace and Queen Charlotte's cottage and archaeological remains of White House and Castellated Palace.
- Brick perimeter wall punctuated by ornate entrances.

3.8.4 Key attributes contributing to the OUV of the WHS **preserved and living plant collection** include:

- World class herbarium; the world's biggest collection with some 7,000,000 plant specimens and over 1,200,000 specimens of fungi. Included in this collection are 270,000 type specimens representing a quarter of the world's named plants
- Living plant collection; the world's largest documented botanical collection of about 40,000 plant taxa representing about 19,000 species
- Museum, archive and library collection. The Economic Plant Collections include some 80,000 items including plant products, associated implements and artefacts. The Library contains one of the world's most important botanical collections with more than 750,000 items including books, periodical titles, letters and 200,000 drawings and prints.

3.8.5 Key attributes contributing to the OUV of the WHS in respect to **horticultural heritage of keynote species and collections**:

- Collection of heritage trees
- Bentham & Hooker taxonomic lay-out
- Archaeological remains of key developments in the botanic gardens

3.8.6 Key attributes contributing to **developments in plant science** esp. in respect of

- Plant taxonomy & systematic botany
- Economic botany
- Biodiversity and plant conservation
- Tradition of training students in horticulture
- Reputation of centre of excellence and of sharing knowledge.

**6.2** The buffer zone covers an area of 35ha, and is described in the current Management Plan (Gross. Max. Landscape Architects 2014, 34) as comprising:

*areas key to the protection of significant views in and out of Kew (e.g. Syon Park); land with strong historical relationships to Kew (e.g. The Old Deer Park, Kew Green); areas that have a bearing on the character and setting of the Gardens (e.g. the River Thames and its islands between Isleworth Ferry Gate and Kew Bridge).*

**6.3** The *Management Plan* sets out key issues for the management of the World Heritage Site. In relation to the 'Boundaries and setting of WHS including Buffer Zones and views' (Gross. Max. Landscape Architects 2014, 94-95) no issues are identified in relation to development within the built-up area of Richmond. This section of the plan identifies key sight lines/view lines (*ibid.* Fig. 12), but other than in relation to existing tower blocks in Brentford (outside the Buffer Zone), no issues are identified. The assessment of the setting of the World Heritage Site (*ibid.*, 53-54) states that views from, and into, the built-up area of Kew are generally

restricted, although the views from the Pagoda – a 50m tall tower located within the southeast part of the gardens – are far reaching, and ‘significant and unusual for the area’. The southern end of Kew Road falls outside any identified key views (including glimpses); only from the northern boundary of the Conservation Area does the Pagoda become visible beyond the Old Deer Park. The application area is not visible in views southeast from the Pagoda (<https://teddingtongardener.files.wordpress.com/2014/06/dscf7018.jpg>).

#### **Assessment of Impact**

- 6.4 The property is not located within the World Heritage Site, and causes no physical harm to this designated heritage asset. The property falls within the World Heritage Site buffer zone, but is not within any of the key identified views to or from Kew Gardens that contribute towards its OUV. It is within the townscape of Richmond that forms part of the 360<sup>o</sup> view from the Pagoda, but the property itself is not currently visible, nor due to its height (see Section 5.9 above) will the proposed extension be visible. It is therefore concluded that there will be **no change** to the OUV of the Royal Botanic Gardens, Kew World Heritage Site.

### **7. CONCLUDING COMMENTS**

- 7.1 The scheme is for internal and external alterations to a single property within the Kew Foot Road Conservation Area. It is not a designated heritage asset, but has been classified as a Building of Townscape Merit. The majority of the works replicate a scheme consented in 2019 (planning reference 19/2300/FUL), but it also now includes an extension at the rear of the property. An assessment of potential impact on the significance (special interest) of the Kew Foot Road Conservation Area and the OUV of the Royal Botanic Gardens, Kew World Heritage Site has been undertaken, and **no change** to either is predicted.

- 7.2 With reference to local planning policy the scheme has been designed in accordance with the ‘strategic vision’ for the Borough, and the ‘strategic objectives’ relating to ‘protecting local character’. It also complies with policies LP1-LP4 and LP6 of the *Local Plan*, specifically in relation to (a) the design as a response to the local character of the area (including elements of the townscape that contribute towards the special interest of the Kew Foot Road Conservation Area), (b) the height and design of the extension in relation to 102-104 Kew Road and the wider townscape of the Kew Foot Road Conservation Area, (c) conservation of a designated heritage asset (specifically preserving the character of the Kew Foot Road Conservation Area), (d) preserving a non-designated heritage asset (a Building of Townscape Merit), and (e) protecting the setting of the Royal Botanic Gardens, Kew World Heritage Site. At a more local level the scheme also positively contributes to the proposals for management of the Kew Foot Road Conservation Area, as set out in its *Conservation Area Study*.

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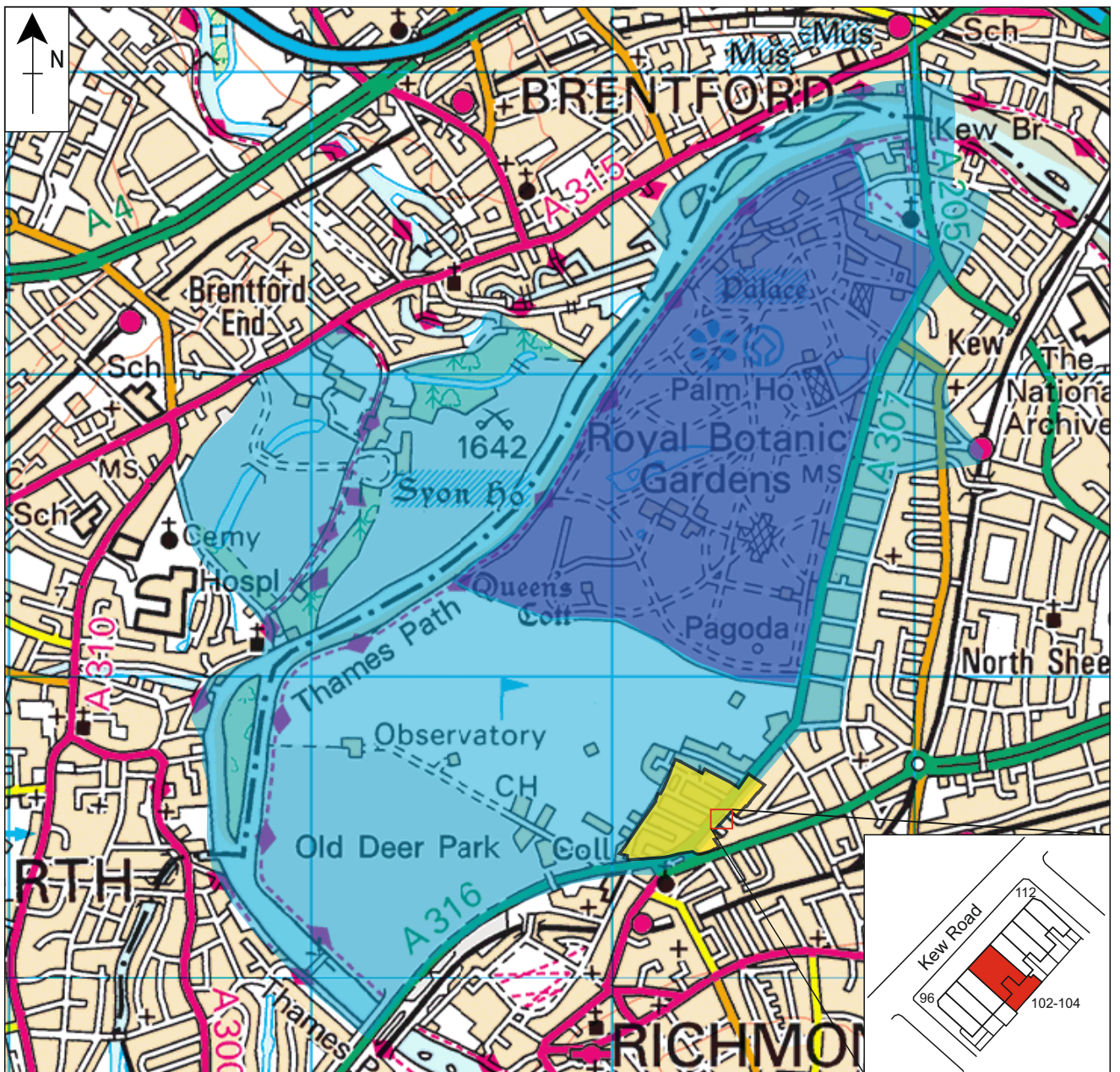
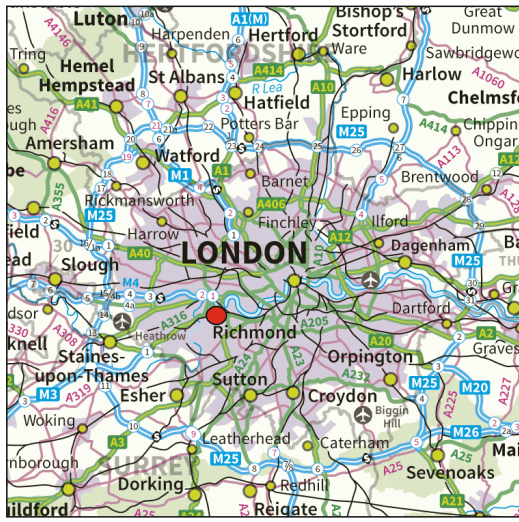
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- Site
- Kew Foot Road Conservation Area
- Royal Botanic Gardens, Kew World Heritage Site
- Buffer zone of World Heritage Site

PROJECT

102-104 Kew Road, Richmond, Surrey

TITLE

Fig.1: Site location





# Appendix 1

## National and Local Planning Policy and Guidance

## **The National Planning Policy Framework**

**A1.1** General policy and guidance for the conservation of the historic environment are contained in Chapter 16 (Paragraphs 184–202 and associated footnotes) of the *National Planning Policy Framework* (NPPF; Ministry of Housing, Communities and Local Government 2019a). This document provides the definition of a heritage asset as ‘a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)’ (*ibid*, 67). Designated heritage assets are defined as ‘a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation’ (*ibid*).

**A1.2** The following policies are relevant to this scheme:

### **Paragraph 184**

*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.*

### **Footnote 62 to paragraph 184**

*The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.*

### **Paragraph 189**

*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.*

### **Paragraph 190**

*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.*

### **Paragraph 192**

*In determining applications, local planning authorities should take account of:*

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

### **Paragraph 193**

*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 (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.*

**Paragraph 194**

*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.*

**Paragraph 195**

*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.*

**Paragraph 196**

*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.*

**Paragraph 200**

*Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.*

**Paragraph 201**

*Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.*

**Local Authority Plan**

- A1.3** Policies for the management and protection of the historic environment in Richmond (as relevant to this scheme) are set out in the London Borough of Richmond *Local Plan*, adopted in 2018. The 'strategic vision' includes the following statement on the historic environment:

### **Villages and historic environment**

*The borough's villages and their special and distinctive characters will have been protected, with each being unique, recognisable and important to the community and to the character of the borough as a whole. They will continue to maintain and enhance their distinctiveness in terms of the community, facilities and local character. Heritage assets including listed buildings and Conservation Areas, historic parks as well as Royal Botanic Gardens, Kew World Heritage Site, which contribute so significantly to the character of this borough, will have been protected and enhanced.*

**A1.4** This translates into following 'strategic objectives', under the heading 'protecting local character':

- 1. Maintain and enhance the borough's attractive villages, including the unique, distinctive and recognisable local characters of the different village areas and their sub-areas.*
- 2. Protect and, where possible, enhance the environment including the heritage assets, retain and improve the character and appearance of established residential areas, and ensure new development and public spaces are of high quality design.*

**A1.5** Policies (or extracts from policies) relevant to this scheme are as follows:

#### **Policy LP 1**

##### **Local Character and Design Quality**

*A. The Council will require all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.*

*To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:*

- 1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;*
- 2. sustainable design and construction, including adaptability, subject to aesthetic considerations;*
- 3. layout, siting and access, including making best use of land;*
- 4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;*
- 5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and*
- 6. suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.*

*All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within a neighbourhood plan where applicable, and the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design.*

#### **Policy LP 2**

##### **Building Heights**

*The Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means:*

- 1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality*

*and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;*

*2. preserve and enhance the borough's heritage assets, their significance and their setting;*  
*3. respect the local context, and where possible enhance the character of an area, through appropriate:*

- a. scale*
- b. height*
- c. mass*
- d. urban pattern*
- e. development grain*
- f. materials*
- g. streetscape*
- h. Roofscape and*
- i. wider townscape and landscape;*

*4. take account of climatic effects, including overshadowing, diversion of wind speeds, heat island and glare;*

*5. refrain from using height to express and create local landmarks; and*

*6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.*

### **Policy LP 3**

#### **Designated Heritage Asset**

*A. The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:*

*1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.*

*2. Resist the demolition in whole, or in part, of listed building. Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II\* and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset.*

*3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place.*

*4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.*

*5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on an accurate understanding of the significance of the heritage asset.*

*6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.*

*7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.*

*8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.*

*9. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.*

*B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:*

- 1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;*
- 2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or*
- 3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.*

*C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.*

*D. Where there is evidence of intentional damage or deliberate neglect to a designated heritage asset, its current condition will not be taken into account in the decision-making process.*

*E. Outline planning applications will not be accepted in Conservation Areas. The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.*

#### **Policy LP 4**

##### **Non-Designated Heritage Assets**

*The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features.*

*There will be a presumption against the demolition of Buildings of Townscape Merit.*

#### **Policy LP 6**

##### **Royal Botanic Gardens, Kew World Heritage Site**

*The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site, its buffer zone and its wider setting. In doing this, the Council will take into consideration that:*

- The World Heritage Site inscription denotes the highest significance to the site as an internationally important heritage asset.*
- The appreciation of the Outstanding Universal Value of the site, its integrity, authenticity and significance, including its setting (and the setting of individual heritage assets within it) should be protected from any harm.*
- Appropriate weight should be given to the Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Royal Botanic Gardens, Kew Landscape Master Plan.*

#### **Richmond and Richmond Hill Village Planning Guidance**

##### **A1.6**

The application area is located within Richmond and Richmond Hill Village, and the London Borough of Richmond's 2016 supplementary planning guidance *Richmond and Richmond Hill Village Planning Guidance* provides a useful guide to the character of the area, and architectural distinctiveness of the built environment in relation to the development of the village (from the Georgian period onwards). The document also includes guidance on thermal efficiency, specific identified development sites, shop fronts, and forecourt parking. In relation to development management, however, it is outdated, since it refers to local planning policies predating the 2018 adopted *Local Plan*.

### **Local Conservation Area Guidance**

- A1.7** A general guide to living in, owning or working in a property within a Conservation Area in Richmond is set out in the London Borough of Richmond Upon Thames' 2012 *Planning Information for Conservation Areas*. This is supported by the London Borough of Richmond's 2015 *Supplementary Planning Document Buildings of Townscape Merit*, which provides a guide to such building, and includes basic planning-related information. The Kew Foot Road Conservation Area has a specific *Conservation Area Study* (London Borough of Richmond Upon Thames 2007a), and a *Conservation Area Statement* (London Borough of Richmond Upon Thames 2007b). The former document sets out a detailed appraisal of the area, its history, character and special interest, along with management proposals, and general guidance, whilst the latter provides a summary of the character, and identifies in broad terms problems and pressures, and opportunities for enhancement.

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