

**Ham Polo Club Sand
Arena, Twickenham
Archaeology Desk
Based Assessment &
Heritage Statement**

Client: HAM POLO CLUB LTD

AB Heritage Project No: 61528

Date: 02/07/2021

GLHER Data Licence Number: 15957

Ham Polo Club Sand Arena, Twickenham Archaeology Desk Based Assessment & Heritage Statement

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Rev Number	Description	Undertaken	Approved	Date
1.0	Draft	LT	DD	10/06/2021
2.0	Final	LT	DD	02/07/2021

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EXECUTIVE SUMMARY

AB Heritage Limited has been commissioned by Ham Polo Club Ltd to produce a Combined Archaeology Desk Based Assessment & Heritage Statement covering proposed works to the Sand Arena within Ham Polo Club, Twickenham. It was requested as part of forthcoming planning application.

The proposal scheme seeks to extend the existing sand arena on the west side of Ham Polo Club. The extended sand arena would have a close-boarded timber fence boundary up to a height of 1.5m with 1m deep concrete foundations under each fence post.

The report has charted the historic development of the site and surrounding area, revealing the site to have been historically within the boundary of Ham House Gardens as an orchard until it became part of Ham Polo Club in the mid-20th century. Orchards and woodlands are potentially damaging to underlying archaeological remains.

The proposal site is in an area enclosed with large mature trees on the north, east and west boundaries effectively screening the site from Ham House located to the west of the site. The site visit did not find obvious indications of underlying archaeological remains.

This report has identified records of archaeological remains within the study area most of which are isolated findspots, the closest being c. 240m to the south east of the site. Due to the past impacts noted within the site boundary and the proposed foundations for the extended Sand Arena being up to 1m deep, there is deemed to be a Low potential for the recovery of complex or significant archaeological remains on the site.

This report found Ham House Gardens incorporating the East Boundary Garden Wall, and Ham House Conservation Area to be heritage assets of Very High Significance.

The Impact Assessment found the proposed development to have a Negligible Indirect Degree of Impact to Ham House Gardens and the East Boundary Garden Wall which in turn would result in a Minor Magnitude of Effect to the significance of the heritage assets. The assessment also assessed that the proposed development would have No Change to the existing character of the Conservation Area and therefore its significance.

No further work is recommended in relation to either archaeology or heritage.

The final decision on further works lies with the Local Planning Authority.

1. INTRODUCTION

1.1 Project Background

- 1.1.1 AB Heritage Limited has been commissioned by Ham Polo Club Ltd to produce a Combined Archaeology Desk Based Assessment & Heritage Statement covering proposed works to the Sand Arena within Ham Polo Club, Twickenham. It was requested as part of forthcoming planning application.
- 1.1.2 This report includes a description of the baseline conditions, from an examination of readily available sources on the history of the site, identifying any known and potential heritage receptors subject to potential impact. It proposes a suitable mitigation strategy, where such works are deemed appropriate.

1.2 Site Location & Description

- 1.2.1 The proposed development site is located within Ham Polo Club, Petersham Road, Twickenham, Richmond, London, TW10 7AH. It occupies a long plot of land containing the existing sand arena, running along the western boundary of the Polo Club, adjacent to Ham House and its gardens to the west. The proposal site occupies an area of c. 0.5 hectares and is centred on National Grid Reference (NGR): TQ 1736 7311 (Photo 1).

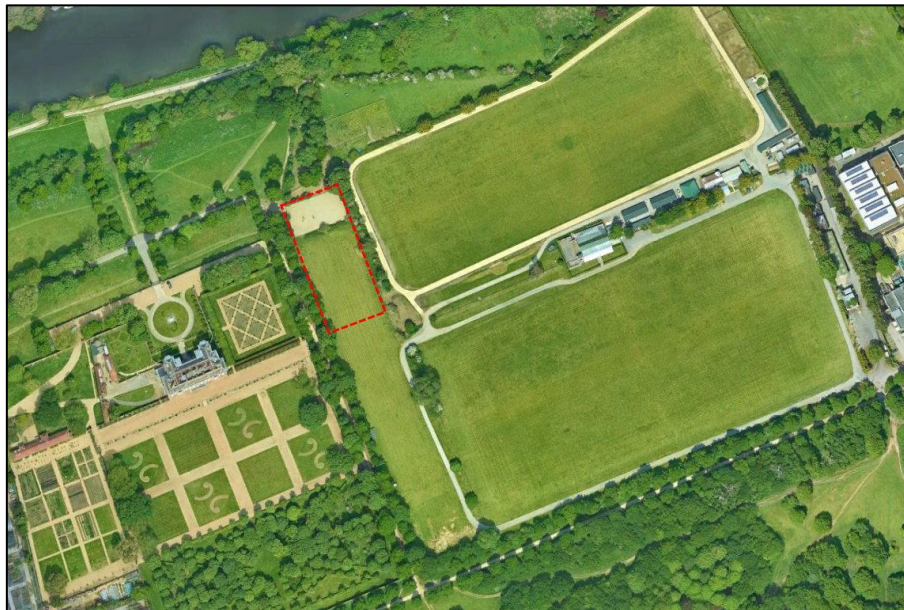


Photo 1. The Proposed Development Site (Google Earth, 2021)

- 1.2.2 The site is located within the boundaries of the Grade II* Ham House Registered Park and Garden [AB 12], the Ham Archaeological Priority Area [AB 22] and the Ham House Conservation Area [AB 20].

1.3 Geology & Topography

- 1.3.1 The underlying solid geology of the site is clay and silt of the London Clay Formation, formed up to 56 million years ago. The solid geology is recorded as being overlain by superficial

deposits of clay and silt of the Langley Silt Member formed up to 2 million years ago (British Geological Survey, 2021).

- 1.3.2 The site lies at around 113m above Ordnance Datum (aOD) on land which occupies a gradual north facing slope towards the River Thames.

1.4 Overview of Proposed Development

- 1.4.1 The proposal scheme seeks to extend the existing sand arena on the west side of Ham Polo Club. The extended sand arena would have a close-boarded timber fence boundary up to a height of 1.5m with 1m deep concrete foundations under each fence post (Figure 4).

1.5 Planning Background & Consultation

- 1.5.1 In April 2021, the London Borough of Richmond upon Thames Council provided the client with pre-application advice for the proposed development scheme (REF: 21/P0009/PREAPP). The pre-application response did not raise any heritage related comments.
- 1.5.2 On Friday 4th of June 2021 Leanne Tindle (Assistant Heritage Consultant, AB Heritage) contacted Ms Nicki Dale (Development Control Team Leader, London Borough of Richmond Upon Thames Council) via email. The purpose of the consultation was to outline the scope of the report and highlight the heritage assets in the surrounding area which would be considered as part of this report. Ms Dale was contacted due to her having previously provided advice for a similar site within Ham Polo Club (Ref: 20/P0292/PREAPP. AB Heritage, 2020).
- 1.5.3 In response, an email from Ms Wendy Wong Chang (Principal Planning Officer, London Borough of Richmond Upon Thames Council) was received on 4th of June 2021 acknowledging the email but advising she was on leave and would respond when she returned to office. At the time of writing, no further response had been received.

1.6 Project Qualifiers

- 1.6.1 This report has been prepared under instruction and solely for the use of Ham Polo Club Ltd, and any associated parties they elect to share this information with.
- 1.6.2 Measurements and distances in this report are approximations only and should not be used for detailed design purposes.
- 1.6.3 All work undertaken is based upon the professional knowledge of AB Heritage and relevant standards, technology, and legislation at the time of writing. Changes in these areas may occur in the future, causing changes to the conclusions, recommendations or advice given. AB Heritage is not responsible for advising any parties on the implications of such changes.
- 1.6.4 This report utilises information obtained from third party sources. AB Heritage takes no responsibility for the accuracy of such information.
- 1.6.5 Where recommendations are provided these need to be approved by the Local Planning Authority and do not themselves comprise mitigation of impacts.

2. AIMS & METHODOLOGY

2.1 Aims of Report

2.1.1 Early assessment of the implications of proposed development on the heritage resource is key to informing reasonable planning decisions. Indeed, NPPF 189 requires local planning authorities to request descriptions on the significance of any heritage assets affected by a proposal, including any contribution made by their setting. This states that:

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

2.1.2 This assessment therefore has the following objectives:

- To provide sufficient evidence on the cultural heritage of the site and any potential impacts on such a resource, to inform the Local Planning Authority’s decision-making process in relation to the current planning application; and
- To develop appropriate recommendations / mitigation responses, where necessary, to assist the work of the planning team.

2.2 Methodology

Study Area

2.2.1 Following advice available on the Greater London Historic Environment Record website and initial research of the site and surrounding area, a study area of 500m was deemed sufficient to capture the relevant heritage assets and provide an ample search radius from which to capture any known archaeological remains.

Standards & Guidance Used

2.2.2 The assessment has been carried out in line with the following guidance:

- *Standard and guidance for historic environment desk-based assessment* (ClfA, 2017);
- *Conservation Principles, Policies & Guidance for the Sustainable Management of the Historic Environment* (Historic England, 2008);
- *Managing Significance in Decision-Taking in the Historic Environment* (Historic England, 2015);
- *The Setting of Heritage Assets* (Historic England, 2017);
- *Standard and Guidance for the Archaeological Investigation and Recording of Standing Buildings and Structures* (ClfA, 2019);
- *Statements of Heritage Significance: Analysing Significance of Heritage Assets* (Historic England, 2019).

Selection and Assessment of Sources

- 2.2.3 In line with para 3.3.6 and Annex 1 of the Chartered Institute for Archaeologists' Standard and Guidance for Historic Environment Desk Based Assessment, this report considers appropriate sources of information and a rationale behind their use. These have been detailed in Table 1:

Table 1: Examination of Appropriate Sources

SOURCE	TYPE OF EVIDENCE	CONSULTED	COMMENT
Greater London Historic Environment Record	The primary source of information concerning the current state of archaeological, heritage and architectural knowledge in this area. Contains published and unpublished archaeological and historical sources, including any previous investigations undertaken within the study area.	08/12/2020	GLHER Data Licence Number: 15957. The HER data was supplemented by the collation of data from other sources detailed below.
Consult London Borough of Richmond upon Thames Conservation Officer	Early discussion with the Local Planning Authority Planning Archaeologist and / or Conservation Officer is key to understanding the significance of an area and creating a tailored approach most appropriate to assessment of a site.	04/06/2021	Leanne Tindle (Assistant Heritage Consultant, AB Heritage) contacted Ms Nicki Dale (Development Control Team Leader, London Borough of Richmond Upon Thames Council) via email. This was passed onto and acknowledged by Ms Wendy Wong Chang (Principal Planning Officer, London Borough of Richmond Upon Thames Council). At the time of writing no further response had been received.
Site Walkover	This task allows for development of a greater understanding of the on-site heritage resource, or any historic issues of the site, including information the general condition and setting of the area of proposed development and the site in which it stands.	03/06/2021	A site visit was undertaken by Leanne Tindle (Assistant Heritage Consultant, AB Heritage) on the 2 nd of June 2021.
National Heritage List for England	Information on statutory and non-statutory designated sites, including Listed Buildings and Scheduled Monuments.	28/05/2021	
Richmond Local Studies Library and Archive	Readily accessible information on the site's history from readily available historic documentary sources, maps and photographs.	01/06/2021	The online catalogue for Richmond Local Studies Library and Archive was consulted and did not contain any extra information pertinent to this report.
Archaeology Data Service	The ADS is a digital repository for heritage records that supports the long-term digital preservation of such data to support future research, learning and teaching.	01/06/2021	The Archaeology Data Service did not on this occasion provide anything pertinent to this report.

SOURCE	TYPE OF EVIDENCE	CONSULTED	COMMENT
Heritage Gateway	An extensive database allowing for cross-search of over 60 resources on England's local and national historic sites, buildings and archaeology, including images of listed buildings.	28/05/2021	
MAGIC	The MAGIC website provides authoritative geographic information about the natural environment from across government, including from Historic England. The information in an interactive map format covers rural, urban, coastal and marine environments.	28/05/2021	
Local Historic Societies	Using the British Association for Local History (https://www.balh.org.uk/) list of local societies, checks were made with relevant organisations where there was a specific and obvious benefit to consulting local expertise on the history of the proposed development site.	N/A	Local societies were not contacted as a sufficient level of information was available elsewhere.

2.2.4 For reporting purposes, any relevant archaeological information gathered from the above sources has been allocated an AB numbers, which can be viewed in the Cultural Heritage Features Gazetteer (Appendix 1).

Assessment of Archaeological Potential

2.2.5 This report contains a record of the known historic environment resource of the area. It also assesses the potential for archaeology to survive within the limits of the site, using the following scale:

- No Potential - Clear evidence of past impacts / site sterilisation
- Low - Very unlikely to be encountered on site
- Medium - Features may occur / be encountered on site
- High - Remains almost certain to survive on site

2.2.6 In relation to buried archaeological remains, where a site is known or there is a medium or above potential for archaeology to survive, full impact assessment will be undertaken.

Assessment of Receptors Significance

2.2.7 Assessment of the heritage significance of a receptor is judged upon various factors, including any existing designation, plus information on any relevant architectural, archaeological, or historical factors. Considering these criteria, each identified feature is assigned a level of significance in accordance with a five-point scale (Table 2, below).

Table 2: Assessing the Significance of a Receptor

SCALE OF ASSET SIGNIFICANCE	
VERY HIGH	Sites of exceptional interest that reflect the highest qualities of evidential, historic, aesthetic or communal value. These can include Scheduled Monuments, Grade I and Grade II* Listed Buildings, Conservation Areas containing very important buildings, or non-designated structures / site / landscapes with exceptional coherence, time depth, or other critical factors.
HIGH	Building or site (whether designated or not) of notable / special heritage interest, reflected in strong and coherent survival of key factors, such as extent / condition / context associations. Examples may include buildings contributing significantly to the historic character of an area, or archaeological remains with the potential to contribute to research priorities (e.g. burial sites, deserted medieval villages, Roman roads and dense scatter of finds, etc).
MEDIUM	Buildings, structures, sites with some heritage interest, albeit with lesser values than listed above. These can include 'locally designated' buildings or 'non-designated heritage assets' with recognisable survival of key elements, historic interests and / or legibility (albeit somewhat degraded in form / nature), whether from the built or archaeological perspective.
LOW	Structures or sites with very little heritage interest and / or heavily degraded sites resulting in little or no surviving heritage legibility. Examples include ephemeral remains; structures of almost no architectural / historic merit; buildings of an intrusive character; or relatively modern / common landscape features such as quarries, drains and ponds etc.
UNKNOWN	Insufficient information exists to assess the importance of a building or site (e.g. lack of relevant data on archaeology of the surrounding area or elements of the feature were obscured / access was restricted).

2.2.8 The significance of known heritage assets is typically determined by reference to existing designations. **Where a receptor’s interest or value covers a range of the above possibilities or, for previously unidentified features, where no designation has yet been assigned, the significance of a receptor is based on professional judgement.** For example, while all nationally registered, Listed Buildings can range in scale and importance from a single milestone to the site of St Paul’s Cathedral. For this reason, adjustments are made on a case by case basis.

Impact Assessment Criteria

2.2.9 The degree of impact upon the heritage resource is determined by identifying the level of effect from the proposed development upon the baseline conditions of the site and the cultural heritage resource identified. The criteria for assessing the level of impact are set out in Table 3 (below).

2.2.10 It is not always possible to confirm the degree of impact. However, where possible a professional judgement as to the scale of such impacts is applied to enable the subsequent ‘Magnitude of Effects’ to be established (Table 4). It should be noted that an impact level of ‘uncertain’ is included for those situations where it is simply not appropriate to make such a judgement at this stage of works.

Table 3: Criteria for Determining Degree of Impact

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

2.2.11 The overall Magnitude of Effects from the proposed development upon the resource is determined by correlating the significance of a heritage asset against the degree of impact it may be subject to. Table 4 highlights the criteria for assessing the overall Magnitude of Effects. Where effects are moderate or above these are classified as Substantial Harm, terms of NPPF.

Table 4: Magnitude of Effects

SIGNIFICANCE	MAGNITUDE OF IMPACT			
	HIGH	MEDIUM	LOW	NEGLIGIBLE
VERY HIGH	Severe	Major	Mod	Minor
HIGH	Major	Mod	Minor	Minor / Not Sig.
MEDIUM	Mod	Minor	Minor / Not Sig.	Not Sig.
LOW	Minor	Minor / Not Sig.	Not Sig.	Nt.

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

3. PLANNING & LEGISLATIVE FRAMEWORK

3.1 Archaeological & Heritage Legislation

- 3.1.1 Current legislation, in the form of the Ancient Monuments and Archaeological Areas Act 1979, provides for the legal protection of important and well-preserved archaeological sites and monuments through their addition to a list, or 'schedule' of archaeological monuments.
- 3.1.2 Likewise, structures are afforded legal protection in the form of their addition to 'lists' of buildings of special architectural or historical interest, under the Planning (Listed Buildings and Conservation Areas) Act, 1990. This legislation also allows for the creation and protection of Conservation Areas by local planning authorities to protect areas and groupings of historical significance.
- 3.1.3 The categories of assets with some form of legal protection have been extended in recent years, and now include Registered Parks and Gardens, and Historic Battlefields. While designation as a UNESCO World Heritage Site is not a statutory designation under English planning law, such a designation is regarded as a material consideration in planning decisions.

3.2 National Planning Policy 2019

- 3.2.1 The NPPF sets out government policy on the historic environment, which covers all elements, whether designated or not, that are identified as 'having a degree of significance meriting consideration in planning decisions, because of its heritage interest'.
- 3.2.2 The level of detail required in the assessment should be 'proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.
- 3.2.3 Paragraphs 195 & 196 explain that 'where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 3.2.4 It also advises that where a proposal involve less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

3.3 Local Planning Policy

London Borough of Richmond upon Thames Local Plan – Adopted July 2018

LP 3 Designated Heritage Assets

- 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.

LP 4 Non- Designated Heritage Assets

- 3.3.1 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.

LP 7 - Archaeology

- 3.3.2 The Council will seek to protect, enhance and promote its 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. Desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance.

4. CULTURAL HERITAGE RESOURCE BASELINE

4.1 Previous Works in the Study Area

Within the Proposed Development Site

4.1.1 No known previous archaeological works have been carried out within the site boundary.

Within the 500m Study Area

4.1.2 There have been a small number of previous archaeological works carried out in the study area. The closest of which is a Watching Brief carried out c. 45m north of the site on Ham Street which revealed 18th -19th century drains and reused lock gate timbers [AB 3, 4, 5, 6 & 7] below the tow path on the Thames riverbank (Mark Edwards, 2007). Other works in the surrounding area include:

- A Watching Brief carried out within Ham House gardens c. 175m south west of the site. Out of a total of 18 trenches only one contained structural remains of an unknown date (LHAS, 2003).
- A Watching Brief carried out at Ham House during the installation of drainage pipes c. 80m west of the site (National Trust, 2016) . No finds and features were observed during the works.
- Several Archaeology Desk Based Assessments have been carried out within the study area the closest of which was carried out at by AB Heritage in 2020 located within a different area of Ham Polo Club c. 300m east of the current proposal site. This report found there to be a low potential for the recovery of archaeological remains dating from all periods (AB Heritage, 2020).

4.2 Archaeology & History Background

The Prehistoric Period (c .500, 000 BC – AD 43) - The Roman Period (c. AD 43 – AD 410)

4.2.1 The Thames river and its flood plains are well known to have been exploited for resources and fishing during prehistory. Several Prehistoric find spots are recorded within the study area. These comprise a Mesolithic flint axe [AB 1] from the river Thames, and a Neolithic axe [AB 2] found at Petersham Meadow, located c. 300m to the south east of the site.

4.2.2 There are no recorded Roman finds from the site or the study area. The nearest Roman archaeology of any significance is to be found at Richmond c. 2km to the north east of the site and in Kingston upon Thames, c 3.5km to the south of the site.

The Medieval Period (AD 410 – AD 1536)

4.2.3 The villages of Ham and Petersham have their origins in the Saxon Period. The manor of Petersham was granted in the 7th century to the Abbey of St Peter in Chertsey and a church has stood on the site of St Peters Church (located c. 800m to the east of the site) since Saxon times. Petersham village was recorded in 1086, in the Domesday Book, as *Piterichesham* (London Borough of Richmond upon Thames 2008).

4.2.4 There is a paucity of readily available evidence in the study area for the later Medieval period. However, the current St Peters Church located c. 770m east of the site, was built in the 13th century and it can be assumed that Petersham continued as small, nucleated settlement focused on the church throughout this period.

The Post Medieval Period (AD 1537 – AD 1800) & The Modern Period (AD 1801 – present)

4.2.5 The Post Medieval period was a time of significant change within the area surrounding the site. Through the 17th and 18th centuries the villages of Ham and Petersham became fashionable as a rural retreat for wealthy aristocrats. It was during this period that in 1610 Ham House [AB 9] and the gardens [AB 12] of Ham House were constructed to the immediate west of the site for Sir Thomas Vavasour in 1610. Ham House [AB 9] and estate later in the 17th century passed to the Tollemache family with whom it remained until the mid-20th century.

4.2.6 The National Trust holds a map by Sleser and Wyke produced in 1671-2 (Plate 1) which depicts Ham House with formal gardens to the east and west, and a large garden to the rear enclosed by a wall. It also depicts what appears to be a long, wide orchard adjacent to Ham House gardens on the east and avenues leading to the east and south of Ham House and Gardens [AB 9 & 12]. The proposal site occupies a large part of the orchard and a smaller enclosure to the north of the site. The small brideway now known as Melancholy Walk can be seen running parallel between the proposal site and Ham House and Gardens [AB 9 & 12].

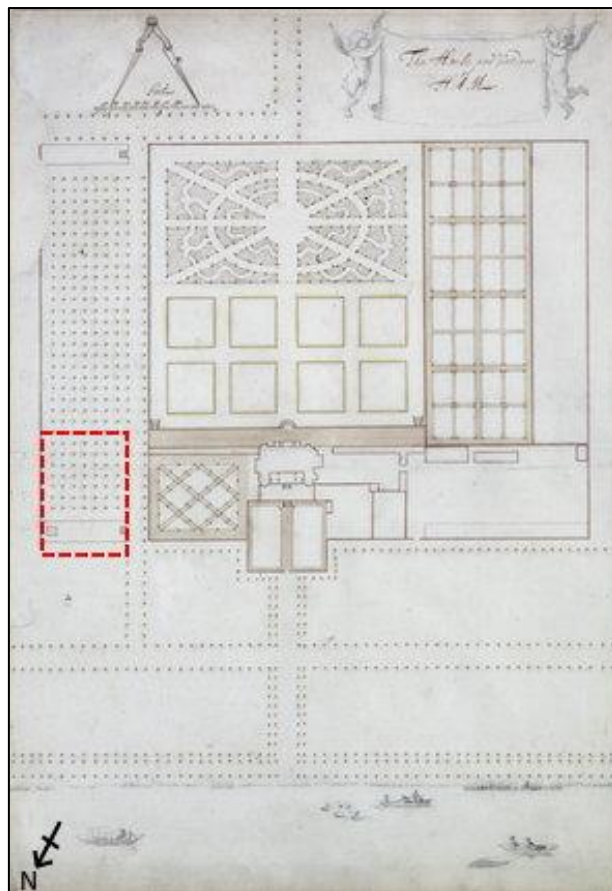


Plate 1. Sleser and Wyke Map of Ham House and Gardens, 1671-2

- 4.2.7 Plate 1 above, is very similar to John Roque's map of 1746, Plate 2 below, which shows the site and surrounding area with the village of Petersham to the east, and Ham House and Gardens [AB 9 & 12] to the west. On this map, the proposal site is located within the long, wide belt trees which runs parallel to the Ham House [AB 9] and forms part of the Registered Gardens [AB 12].



Plate 2. John Roque's Map of 1746

- 4.2.8 In the 19th - 20th century a small number of alterations occurred to the gardens of Ham House which mainly involved the opening of the forecourt and the addition of iron railings to the north of the house [AB 11].
- 4.2.9 Plate 3 below, shows the proposal site and the surrounding area in 1896. The most notable change on Plate 3 is in the fashion of Ham House Gardens [AB 12] which have lost their ornamentation visible on Plate 1 & 2 in favour of a more naturalistic appearance. The gardens have however retained [AB 9] large belts of trees and the open fields present on Plate 2.
- 4.2.10 Plate 3 shows the proposal site as part of the L-shaped outer grounds of Ham House during the late 19th century, which include more naturalistic planting and carriage drives. Compared with the previous map of 1746, the trees which were once part of the large orchard have now been mostly cleared except for the line located immediately adjacent to the boundary wall of Ham House.



Plate 3. Six-Inch OS Map of 1896 (National Library of Scotland)

4.2.11 On the next readily available map, the OS map of 1933 (Plate 4), the fields to the immediate east of the proposal site are now labelled as being a 'Sports Ground' this likely corresponds with the establishment of Ham Common Polo Club in 1926. There also appears to have been a sparse group of trees within the proposal site during this time.

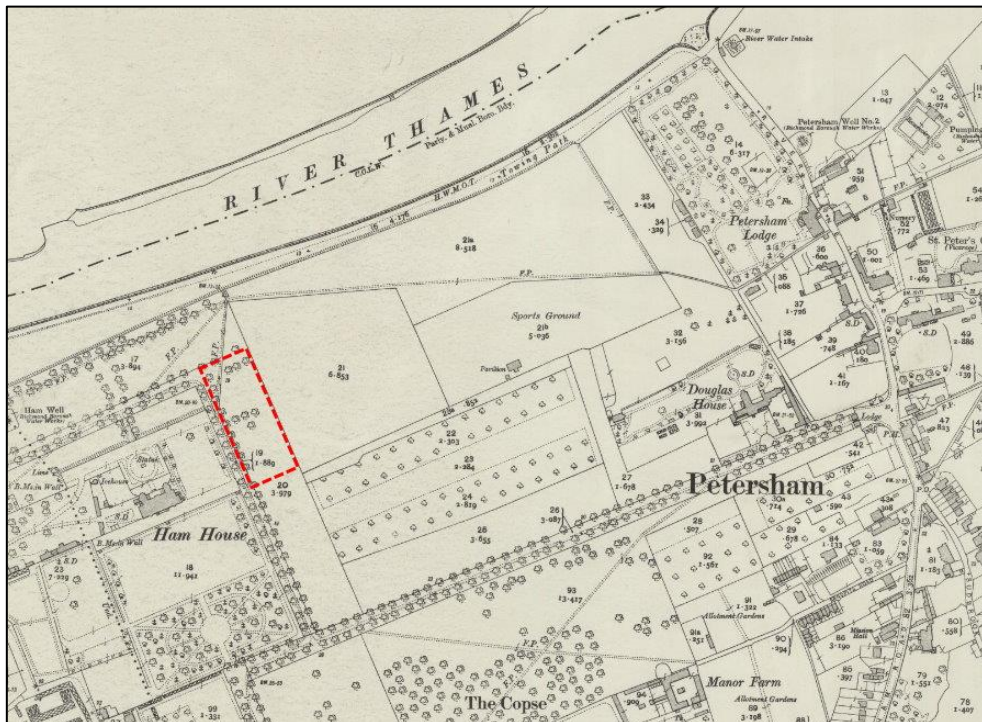


Plate 4. 25-Inch OS Map of 1933 (National Library of Scotland)

4.2.12 By 1947 Ham Polo Club was using the proposal site as a Polo Field to hold matches and in 1954 the tenant of Ham House agreed to convert the orchard of Ham House (field south of the Sports Ground on Plate 4) into a polo field for the club.

4.2.13 Plate 5 below, is an aerial photograph of Ham House and the surrounding area in 1949. The photograph shows the area to the east of the site as fields which appear to have been used for farming. The proposal site is shown as a large flat plot of land with boundaries heavily planted with mature trees separating it from Ham House and its gardens.



Plate 5. Aerial Photograph of the site and surrounding area in 1949 (Historic England, 2021)

4.2.14 Plate 6 shows the site and surrounding area in 1966. The mid twentieth century saw an expansion of residential housing around Petersham which is visible to the south of the site. The proposal site appears unchanged from 1933.



Plate 6. Six-Inch OS Map of 1966 (National Library of Scotland)

- 4.2.15 In the present day (Photo 1), Ham Polo Club has been reconfigured slightly from the arrangements shown on Plate 6, and now comprises two full sized pitches, separated by buildings. The southern polo pitch is the former orchard and the long strip of land to the immediate east of Ham House, historically part of Ham House Gardens [AB 12], is now a large field with the existing sand arena at the north end.

5. SITE VISIT

- 5.1.1 A site visit was undertaken by Leanne Tindle on Thursday the 3rd of June 2021. The purpose of this visit was to gain a first-hand understanding of the existing land use and past impacts within the current site limits, to aid the assessment of changes to the archaeological resource and the built heritage environment.
- 5.1.2 The site visit also provided an opportunity to understand the location and proximity of the site to other heritage assets in the surrounding area including Ham House and Gardens, and associated features [AB 8 - 17].
- 5.1.3 The proposed development site is a large, flat field located on the western limits of the Ham Polo Club, on the south side of the River Thames. The site contains a fenced off sand arena (Photo 2) located at the north end of the field with the rest of the field being grass and used for polo practice (Photo 3).



Photo 2. The Existing Sand Arena

- 5.1.4 The site is bounded on the north, east and west by large mature trees (Photo 3). A post and wire fence forms the western boundary separating the public bridleway known as Melancholy Walk from the site.



Photo 3. The Proposed Development Site looking north

- 5.1.5 Only glimpsed views of Ham House [AB 9] and its eastern boundary garden wall [AB 10] on the western boundary of the site, are possible from the proposal site. This glimpsed and fragmentary view is through the mature trees on the west boundary (Photo 4).



Photo 4. The western boundary of the proposal site

- 5.1.6 The proposed development would be entirely imperceptible from Ham House [**AB 9**] which lies behind walls and mature planting and so this report will not include an impact assessment for that heritage asset.
- 5.1.7 Section 4 above, has shown that the development site historically lay within the boundaries of the Ham House Registered Park [**AB 12**], and so the report will assess the impact of the proposals on that particular heritage asset. Due to the proposal site being close to the Grade II Listed Eastern Boundary Garden Wall [**AB 10**] this will also be included in the impact assessment.
- 5.1.8 There are some designated heritage assets associated with Ham House within the Study Area, but they are separated from the proposal site by the House [**AB 8, 11, 13 – 17**]. Ham House essentially screens them from any of the effects of the proposed development, and for this reason they have also been scoped out of this report.

6. ARCHAEOLOGY RESOURCE & IMPACT ASSESSMENT

6.1 Known Archaeological Resource

Within the Proposed Development Site

6.1.1 No known archaeological resource has been identified within the site boundary.

Within the 500m Study Area

6.1.2 A range of archaeological finds have been recovered in the study area. These finds include findspots or features dating to the Prehistoric and Post Medieval periods. The closest findspot of Prehistoric origin is located on the Thames foreshore and is a Mesolithic Axe [AB 1] recovered c. 240m north east of the site. Other finds or features within the study area relate to the Post Medieval period and are particularly concentrated along the north and south side of the River Thames [AB 3 – 7] the closest of which is located c. 300m northeast of the site.

6.2 Past Impact Within the Site Boundary

6.2.1 In relation to past impacts, the biggest single known impact to underlying archaeological deposits within the site boundary would have been the planting and subsequent felling of the Ham House orchard shown on Plates 2 & 3. The planting, growth of the root system and removal of these trees has the potential to have disturbed any underlying archaeological deposits.

6.2.2 The subsequent construction of the existing sand arena would have required the removal of at least the topsoil to create a suitable base for the overlying layer of sand. It is not clear if the sand area is drained or free draining, but field drains would have incurred a slight and localised impact. Finally, the surrounding fence would have caused slight impacts via post holes. Overall, these impacts are not considered likely to exceed the impacts caused by the orchard.

6.3 Potential Archaeological Resource

6.3.1 Due to the past impacts noted within the site boundary and the proposed foundations for the extended Sand Arena being up to 1m deep, there is deemed to be a Low potential for the recovery of complex or significant archaeological remains on the site. In line with the assessment criteria in para 2.2.5, no further impact assessment in relation to archaeology will be carried out.

7. HERITAGE: STATEMENT OF SIGNIFICANCE & IMPACT ASSESSMENT

7.1 Focus of Study

- 7.1.1 In accordance with English Heritage guidance *Conservation Principles, Policies & Guidance for the Sustainable Management of the Historic Environment* (2008), and Historic England's Advice Note 12 (2019), Heritage Assets derive their significance from a defined range of interests or values. These are **Archaeological**, **Architectural** or **Artistic**, **Historic** and **Setting** Interest. This report will assess those factors relevant to the overall understanding of the importance of the feature under consideration.
- 7.1.2 The site is in proximity to several heritage assets (see Fig. 1, 2 & 3, and Appendix 1). However, based on the site visit and historic research, this report will focus on providing an understanding of the potential impacts to the following Heritage Assets and/or their settings:
- Grade II* Registered Ham House 17th Century Gardens & Grade II Listed Eastern Boundary Garden Wall [**AB 12 & 10**] located c. 15m west of the site.
 - Ham House Conservation Area [**AB 20**]
- 7.1.3 As discussed in Section 5, heritage assets identified within the study area and in close proximity to the site including Ham House [**AB 9**] and associated features [**AB 8, 11, 13 – 17**] have not been carried forward into the following sections. This is due to the proposed development site being almost entirely imperceptible from these heritage assets by being located behind high walls and mature planting.

7.2 Ham House Gardens (incorporating Eastern Boundary Garden Wall)

Description & General Condition

- 7.2.1 The gardens of Ham House [**AB 12**] are a Grade II* Registered Park and Garden covering an area of c. 18.5 hectares and encompasses the lands around Ham House. There are several distinct elements to the gardens, and they include:
- A walled pleasure garden
 - Decorative lawns crossed by footpaths
 - Belts of woodland
 - A Kitchen Garden
 - A wilderness garden
 - Public access land towards the Thames
 - Tree lined walks including Melancholy Walk at the eastern boundary
- 7.2.2 Beyond the Grade II Listed Eastern Boundary Garden Wall [**AB 10**], is land used by Ham Polo Club for the existing sand arena, and which includes the proposal site. This remains within the boundary of the Registered Park and Gardens.

Assessment of Heritage Interest

Architectural Interest

- 7.2.3 Ham House Gardens hold very high values of Architectural Interest encapsulated in numerous elements of landscaping and garden design of exceptional quality and in excellent condition. The gardens surrounding Ham House were restored by the National Trust based on historical sources, including the Slezer & Wyke's design from 1671-2.

Historical Interest

- 7.2.4 The Gardens of Ham House derive their historical interest from their association with Ham House, and those who commissioned and designed the gardens. The house and gardens were originally designed in the early 17th century by Robert Smythson for Sir Thomas Vavasour and later redesigned in 1671 by Slezer & Wyke for the Tollemache family. This family remained in the house until the mid-20th century when the house and grounds were donated to the National Trust.

Setting

- 7.2.5 Ham House gardens have a semi-rural setting, intimately linked to the Thames riverbank, but also benefiting from long landscape views to Richmond Park on higher ground to the east. Though development of the settlements of Ham and Petersham have encroached on the overall boundary of the park, land around the Ham House and Gardens remains largely out of view due to the preservation of the green spaces and the presence of well-established tree lines and wooded areas. The setting of Ham House Gardens contributes to how they are experienced and appreciated within a green, tranquil setting.

Archaeological Interest

- 7.2.6 The site also holds a degree of Archaeological interest in relation to the former design elements of the various gardens, which could yield information for example, regarding the layout and arrangements of former bedding patterns or for the species of plants cultivated here.

7.3 Ham House Conservation Area

Description & General Condition

- 7.3.1 The Ham House Conservation Area includes Ham House, its Gardens, and avenues (described above) as well as a section of the Thames riverbank and a swathe of surviving green spaces (including the Ham Polo Club and the development site) to the east and south of Ham House. These green spaces form an important part of the immediate setting of Ham House giving it a rural feel. The mature trees within the Conservation Area and on its boundaries screen Ham House from the surrounding built up areas facilitating an illusion of a rural idyll.

Assessment of Heritage Interest

Architectural & Artistic Interest

- 7.3.2 The architectural and artistic interest of the Ham House Conservation Area [AB 20] is largely rooted in the aesthetic quality of Ham House [AB 9] which is of an exceptionally high architectural value, with its designed ornamental gardens [AB 12] and associated features [AB 8, 11, 13 – 17]. The Conservation Area encompasses the 18th – 20th century development along Ham Street to the south including a number of fine 18th century buildings that add to the overall architectural and artistic interest of the area. The discreet areas of development within the Conservation Area are linked by carriage drives, footpaths and bridleways further reinforcing the impression of a designed landscape.

Historic Interest

- 7.3.3 The historic interest of Ham House Conservation Area stems from the depth of historic interest in Ham House and Gardens [AB 9 & 12], Ham Polo Club to the east and the high quality of surviving 18th century development to the south.

Archaeological Interest

- 7.3.4 There are several recorded archaeological finds within the Conservation Area including a Neolithic Axe [AB 2] located along Petersham Avenue, and further Pre-historic finds located along the Thames [AB 1]. This would suggest there is a potential for further archaeological finds to exist within the Conservation Area which affords a degree of archaeological interest to the area.

Setting

- 7.3.5 The semi-rural character and riverside setting to the north and west of the Ham House Conservation Area provides a tranquil, picturesque landscape, similar to that of the Ham House Gardens. However, to the east, south and west of the Conservation Area there is relatively dense residential development which cannot be considered to contribute to the overall significance of the Conservation Area.

Overview of Significance

- 7.3.6 Ham House Conservation Area contains buildings and gardens of exceptional Architectural and Historical Interest. Therefore, in line with Table 2 it is considered to be a heritage asset of Very High Importance, i.e., ‘*Sites of exceptional interest that reflect the highest qualities of evidential, historic, aesthetic or communal value. These can include Conservation Areas containing very important buildings, or landscapes with exceptional coherence, time depth, or other critical factors*’.

7.4 Summary of Significance

- 7.4.1 The significance of Ham House Gardens and associated heritage assets are accurately reflected in their designations. In line with Table 2 they are judged to be as follows.

Table 5: Summary of Level of Significance

AB No	Feature	Designation	Significance
12	Gardens of Ham House (Incorporating the Eastern Boundary Garden Walls)	Grade II* Registered Park and Garden	Very High
40	Ham House Conservation Area	Conservation Area	Very High

7.5 Predicted Impact of Proposed Development

Indirect Impact to Ham House Garden incorporating the Eastern Boundary Garden Wall & Gate Piers

- 7.5.1 The proposed extension to the existing sand arena at the western boundary of Ham Polo Club would create a visual change at ground level only. Furthermore, the extended sand arena would be closely hemmed in by mature trees on the site boundary and by a close boarded timber fence. The small scale of the proposals will not be visible from beyond the Eastern Garden Wall inside the Ham House Gardens.
- 7.5.2 In line with Table 3, the proposals are deemed to have a Negligible Indirect Impact to Ham House Gardens, i.e., *'Barely distinguishable change from baseline conditions, where there would be very little appreciable effect on a known site, thought to have no long-term effect on the historic value of a resource'*. In turn, this would result in a Minor Magnitude of Effect to the significance of Ham House Gardens. In terms of NPPF this constitutes Less Than Substantial Harm.

Indirect Impact to Ham Conservation Area

- 7.5.3 The proposed development would not introduce anything into the Conservation Area that is not currently there, the new sand arena is an extension of the existing. Coupled with the fact that the proposal site is enclosed by mature trees, and that the proposal is a ground level change, it is considered that there would be No Change to the existing character of the Conservation Area.

8. RECOMMENDATIONS & CONCLUSIONS

8.1 Outline Recommendations

- 8.1.1 No further work is recommended in relation to either archaeology or heritage.
- 8.1.2 The final decision on further works lies with the Local Planning Authority.

8.2 Conclusion

- 8.2.1 AB Heritage Limited has been commissioned by Ham Polo Club Ltd to produce a Combined Archaeology Desk Based Assessment & Heritage Statement covering proposed works to the Sand Arena within Ham Polo Club, Twickenham. It was requested as part of forthcoming planning application.
- 8.2.2 The proposal scheme seeks to extend the existing sand arena on the west side of Ham Polo Club. The extended sand arena would have a close-boarded timber fence boundary up to a height of 1.5m with 1m concrete foundations under each fence post.
- 8.2.3 The report has charted the historic development of the site and surrounding area, revealing the site to have been historically within the boundary of Ham House Gardens as an orchard until it became part of Ham Polo Club in the mid-20th century. Orchards and woodlands are potentially damaging to underlying archaeological remains.
- 8.2.4 The proposal site is in an area enclosed with large mature trees on the north, east and west boundaries effectively screening the site from Ham House located to the west of the site. The site visit did not find obvious indications of underlying archaeological remains.
- 8.2.5 This report has identified records of archaeological remains within the study area most of which are isolated findspots the closest being c. 240m to the south east of the site. Due to the past impacts noted within the site boundary and the proposed foundations for the extended Sand Arena being up to 1m deep, there is deemed to be a Low potential for the recovery of complex or significant archaeological remains on the site.
- 8.2.6 This report found Ham House Gardens incorporating the East Boundary Garden Wall, and Ham House Conservation Area to be heritage assets of Very High Significance.
- 8.2.7 The Impact Assessment found the proposed development to have a Negligible Indirect Degree of Impact to Ham House Gardens and the East Boundary Garden Wall which in turn would result in a Minor Magnitude of Effect to the significance of the heritage assets. The assessment also assessed that the proposed development would have No Change to the existing character of the Conservation Area and therefore its significance.
- 8.2.8 No further work is recommended in relation to either archaeology or heritage.
- 8.2.9 The final decision on further works lies with the Local Planning Authority.

9. REFERENCES

Cartographic Sources

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Documentation & Online Sources

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Correspondence

- Leanne Tindle (Assistant Heritage Consultant, AB Heritage) contacted Ms Nicki Dale (Planning Control Team Leader, London Borough of Richmond Council) on 4th of June 2021.

Appendices

Appendix 1 Cultural Heritage Features Gazetteer

This gazetteer incorporates all relevant archaeological and historical sites identified on the GLHER, and other sources within a 500m study area.

Abbreviations

GI LB – Grade I Listed Building

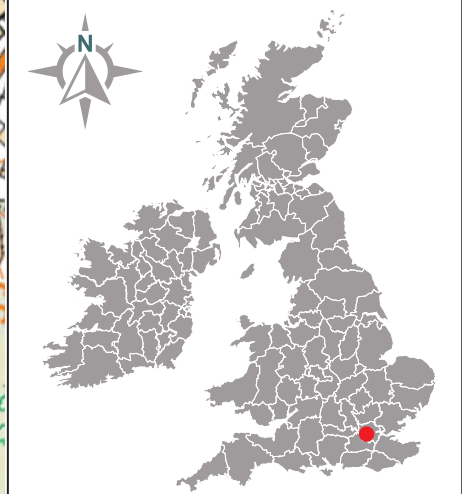
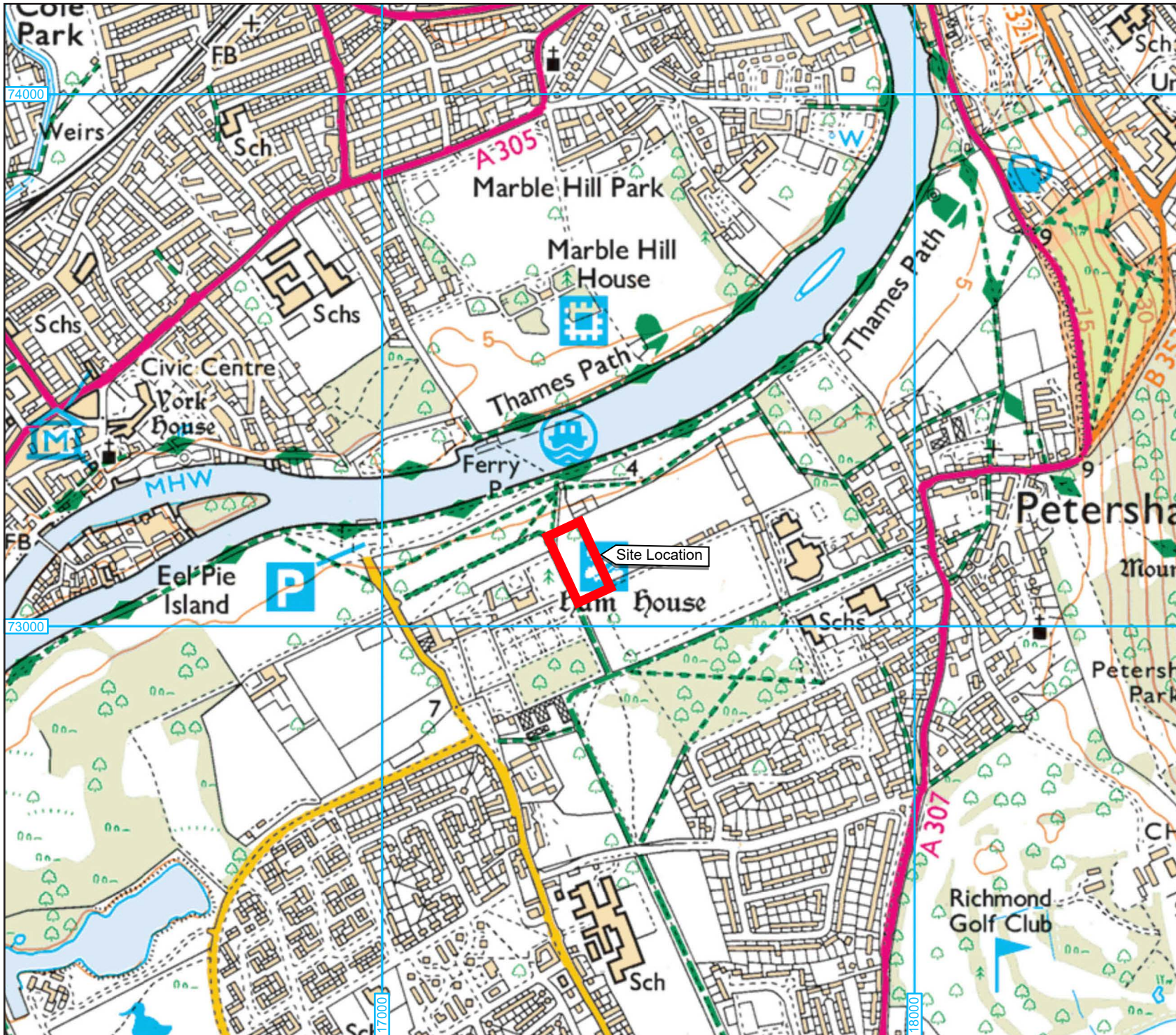
GII LB – Grade II Listed Building

SM – Scheduled Monument

APA – Archaeological Priority Area

AB No.	Period	Description	Status	NGR	Ref. No.
1	Prehistoric	Mesolithic tranchet axe or adze from the Thames river at Petersham	-	TQ 1750 7340	020881/00/00 - MLO180
2	Prehistoric	Neolithic Axe from Petersham Meadow	-	TQ 1770 7300	020961/00/00 - MLO190
3	Post Medieval	Timber Structure, Thames Foreshore survey, Marble Hill Park	-	TQ 1737 7341	022383/00/00 - MLO696
4	Post Medieval	Steps/structure, recorded by Thames Foreshore survey	-	TQ 1751 7348	022401/00/00 - MLO696 022402/00/00 - MLO696
5	Post Medieval	Gate, recorded by Thames Foreshore Survey	-	TQ 1750 7349	022403/00/00 - MLO696
6	Post Medieval	Drain, recorded by Thames Foreshore Survey	-	TQ 1739 7343	022404/00/00 - MLO696
7	Post Medieval	Structure, recorded by Thames Foreshore survey	-	TQ 1759 7341	022447/00/00 - MLO697
8	Post Medieval	Statue 1775 AD – Forecourt of Ham House	GII LB	TQ 17245 73082	MLO91098 NHLE 1192685
9	Post Medieval	Ham House 1610 and 1672-1675. Important Jacobean Mansion	GI LB	TQ 17262 73046	MLO90902 NHLE 1080832
10	Post Medieval	Garden Wall and Gate piers to East of Ham House	GII LB	TQ 17355 73038	NHLE 1080833
11	Post Medieval	Entrance gates to Ham House with 17th century ironwork and railings	GII LB	TQ 17238 73102	MLO91648 NHLE 1358078
12	Post Medieval	17 th century Garden at Ham House	GII* RPG	TQ 1738 7253	MLO59328 NHLE 1000282

AB No.	Period	Description	Status	NGR	Ref. No.
13	Post Medieval	Ham House – Ice House	GII LB	TQ 1719 7306	NHLE 1358079
14	Post Medieval	Service Yard Entrance to the west of Ham House	GII LB	TQ 1720 7301	NHLE 1358096
15	Post Medieval	Ham House Tea Room (Former Orangery)	GII LB	TQ 1715 7299	NHLE 1192746
16	Post Medieval	Ham House Stables	GII LB	TQ 1708 7301	NHLE 1080790
17	Post Medieval	Boundary Wall on the east side of Ham Street between Ham House Stables and The Manor House	GII LB	TQ 1709 7293	NHLE 1358098
18	Post Medieval	Marble Hill Park - The grounds of Marble Hill is the last complete survivor of the elegant 18th century villa and gardens along the river between Richmond and Hampton Court. Located c. 400m to the north west of the site	GII* RPG	TQ 17353 73671	226005/00/00 - MLO592 NHLE 1000400
19	Modern	The German School, Douglas House, 20th century secondary school building.	GII LB	TQ 1778 7312	MLO108716
20	-	Ham House Conservation Area	CA	-	-
21	-	Petersham Conservation Area	CA	-	-
22	-	Ham APA	APA	-	-
23	-	Petersham APA	APA	-	-
24	-	Thames Foreshore APA	APA	-	-
25	-	Twickenham and Marble Hill APA	APA	-	-



KEY
 Site Boundary

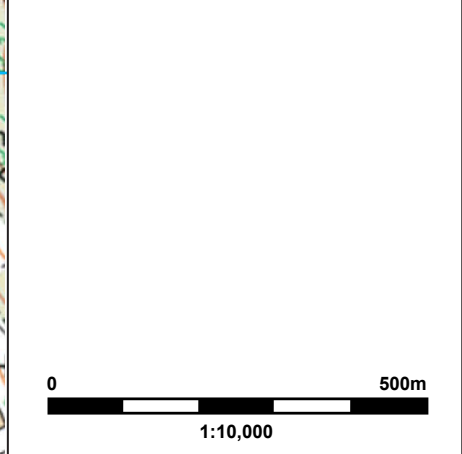
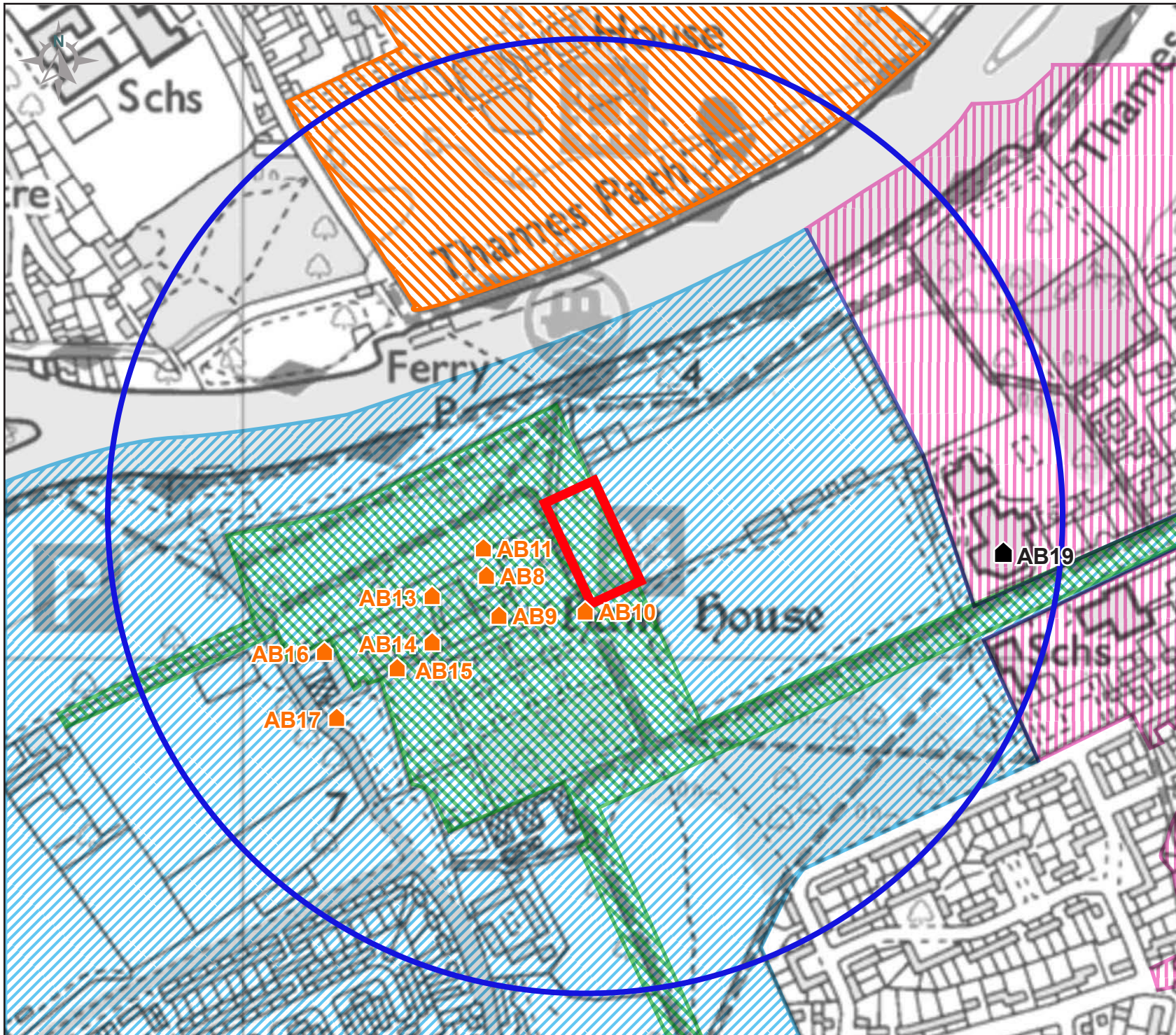


Figure 1: Site Location

Project:
Ham Polo Club, Twickenham

Date: 03/06/21 Job No: 61528



KEY

- Site Boundary
- Search Area (500m)
- Listed Building
- AB12 Ham House Registered Park and Garden
- AB18 Marble Hill Park Registered Park and Garden
- AB20 Ham House Conservation Area
- AB21 Petersham Conservation Area

PERIOD

- Prehistoric
- Roman
- Medieval
- Post Medieval
- Modern
- Undated

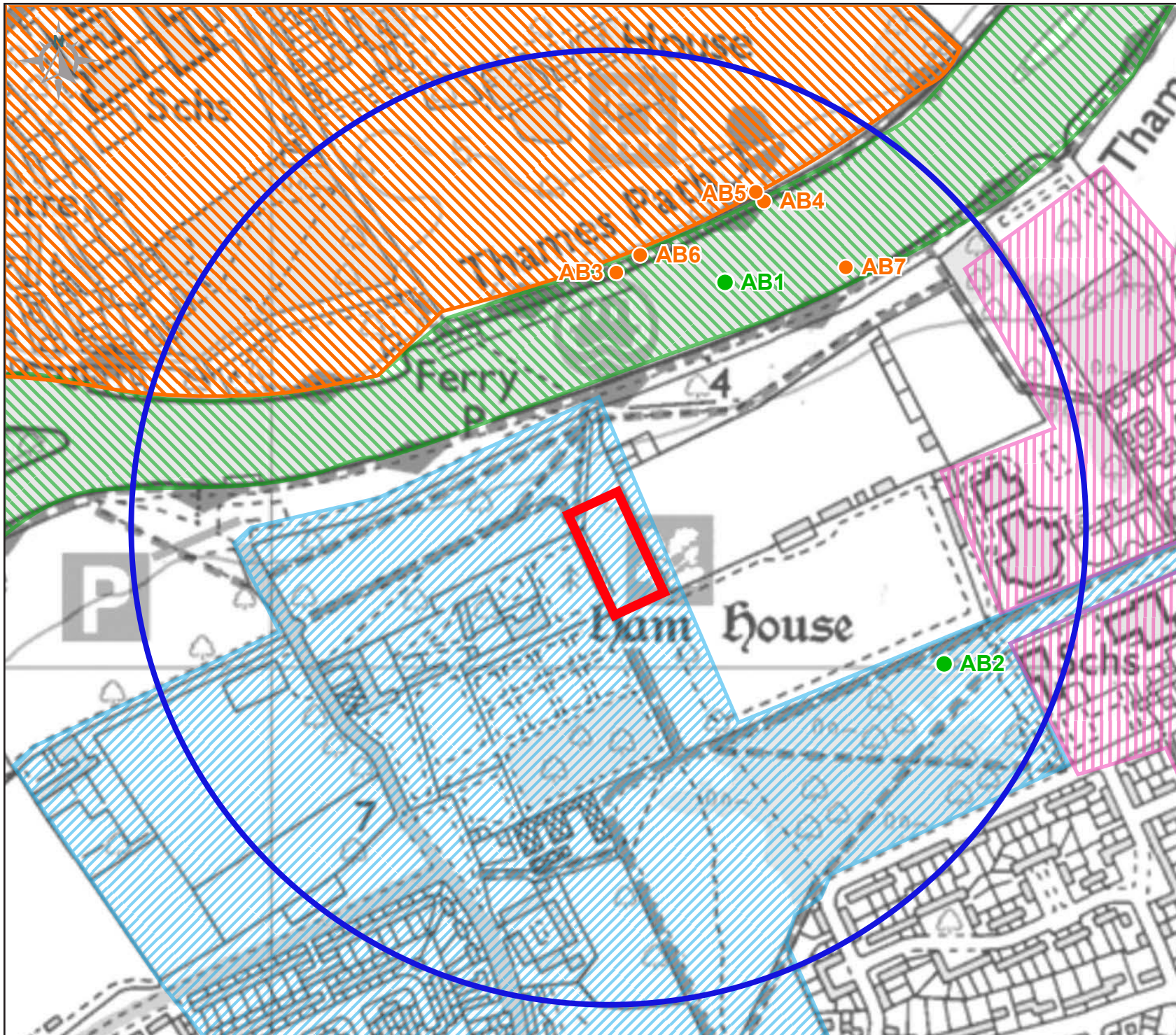


Figure 2: Cultural Heritage Map - Built Heritage








Project:
Ham Polo Club, Twickenham

Date: 03/06/21

Job No: 61528



KEY

-  Site Boundary
-  Search Area (500m)
-  Archaeological Features
-  AB22 Ham Archaeological Prioty Area
-  AB23 Petersham Archaeological Prioty Area
-  AB24 Thames Foreshore Archaeological Prioty Area
-  AB25 Twickenham Archaeological Prioty Area

PERIOD





-  Prehistoric
-  Roman
-  Medieval
-  Post Medieval
-  Modern
-  Undated



Figure 3: Cultural Heritage Map - Archaeological

Project:
Ham Polo Club. Twickenham

Date: 03/06/21 Job No: 61528



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