

**BRIDGES**  
Fund Management

# Bridges Healthcare (Richmond) Limited



# RICHMOND INN

Archaeological Desk-Based Assessment  
MOLA





**THE RICHMOND INN HOTEL**  
**50–56 Sheen Road**  
**London TW9**

London Borough of Richmond

Archaeological desk-based assessment

April 2022



**RICHMOND INN**  
**50–56 Sheen Road**  
**Richmond**  
**TW9 1UG**

## **Archaeological Desk Based Assessment**

NGR 518336 175019

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### Sign-off history

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# Executive summary

*Bridges Healthcare (Richmond) Limited has commissioned MOLA to carry out an Archaeological Desk Based Assessment in advance of proposed development at the Richmond Inn Hotel, 50–56 Sheen Road TW9 in the London Borough of Richmond. The scheme comprises the partial demolition and extension of Richmond Inn for Class C2 visitor accommodation providing care and physiotherapy-led rehabilitation, highways works, car and cycle parking, refuse storage, landscaping and other associated works. This, and the existing building fronting Sheen Road will have a finished floor level c 1.2m below the current lower ground floor. Excavation for new service trenches, an attenuation tank, and landscaping, is anticipated.*

*This desk-based study assesses the impact of the scheme on archaeological remains (buried heritage assets).*

*Above ground heritage assets (historic structures) are not discussed in detail, but they have been noted where they assist in the archaeological interpretation of the site.*

*The site has a low potential to contain archaeological remains dated to the prehistoric, Roman, and medieval periods. The site was likely to have been in woodland, and later fields, during these periods, and only isolated finds are recorded in the area.*

*The site is likely to have been used for pasture in the post-medieval period, until the two pairs of semi-detached houses and their gardens were built, as shown on the Ordnance Survey map of 1861. When the houses were converted to form the Richmond Inn Hotel, and the area to the rear was terraced into the natural slope of the ground for the construction of successive extensions, it is likely that any evidence of the 19th-century gardens or other associated features in the west of the site was removed. Such features may still survive in the east of the site, however, and would be of low significance, based on their limited evidential and historical value.*

*Archaeological survival is also possible to the front of the Hotel, where the area has not been affected by terracing, and where the proposed scheme anticipates the excavation of plant rooms.*

*The new foundations together with ground reduction are likely to remove any archaeological remains within the footprint of the work.*

*Given the site's location, the limited potential for any archaeological remains and their likely low significance, it is considered that no further archaeological investigations would be required in association with the proposed development.*

# 1 Introduction

## 1.1 Origin and scope of the report

- 1.1.1 Bridges Healthcare (Richmond) Limited has commissioned MOLA (Museum of London Archaeology) to prepare an Archaeological Desk Based Assessment in advance of proposed development at The Richmond Inn Hotel, 50–56 Sheen Road, TW9; National Grid Reference (NGR) 518336 175019: Fig 1. The scheme comprises the partial demolition and extension of Richmond Inn for Class C2 visitor accommodation providing care and physiotherapy-led rehabilitation, highways works, car and cycle parking, refuse storage, landscaping and other associated works. This, and the existing building fronting Sheen Road will have a finished floor level c 1.2m below the current lower ground floor. Excavation for new service trenches, an attenuation tank, and landscaping, is anticipated.
- 1.1.2 This desk-based study assesses the impact of the scheme on archaeological remains (buried heritage assets). It forms an initial stage of investigation of the area of proposed development (hereafter referred to as ‘the site’) and may be required in relation to the planning process in order that the local planning authority (LPA) can formulate an appropriate response in the light of the impact on any known or possible heritage assets. These are parts of the historic environment which are considered to be significant because of their historic, evidential, aesthetic and/or communal interest.
- 1.1.3 This report deals solely with the archaeological implications of the development and does not cover possible built heritage issues, except where buried parts of historic fabric are likely to be affected. Above ground assets (i.e., designated and undesignated historic structures and conservation areas) on the site or in the vicinity that are relevant to the archaeological interpretation of the site are discussed where appropriate. The report does not assess issues in relation to the setting of above ground assets (e.g., visible changes to historic character and views).
- 1.1.4 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (MHCLG 2021; see section 9 of this report) and relevant local planning policies. It conforms to standards specified by the Chartered Institute for Archaeologists (CIfA 2020), Historic England (EH 2008, HE 2015, 2017, 2019), and the Greater London Archaeological Advisory Service (GLAAS 2015). Under the ‘Copyright, Designs and Patents Act’ 1988 MOLA retains the copyright to this document.
- 1.1.5 Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author and MOLA, correct at the time of writing. Further archaeological investigation, more information about the nature of the present buildings, and/or more detailed proposals for redevelopment may require changes to all or parts of the document.

## 1.2 Designated heritage assets

- 1.2.1 Historic England’s National Heritage List for England (NHL) is a register of all nationally designated (protected) historic buildings and sites in England, such as scheduled monuments, listed buildings and registered parks and gardens. The NHL does not include any nationally designated heritage assets within the site. The closest nationally designated heritage asset to the site is 40–46 Sheen Road (Grade II listed, NHL ref: 1262107).
- 1.2.2 The boundary of the Royal Botanic Gardens, Kew World Heritage Site extends to Richmond Circus, 350m north-west of the site. Included in the World Heritage Site is the Old Deer Park, which is listed Grade I in the Register of Parks and Gardens of special historic interest; its boundary extends slightly into the north-western edge of the study area.
- 1.2.3 The site is not currently within an archaeological priority area (APA) as designated by the LPA. GLAAS is currently re-assessing APAs throughout the London boroughs in line with new guidelines to link archaeological sensitivity tiers to specific thresholds for triggering archaeological advice and assessment (<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological->



priority-areas/). The Borough of Richmond is currently under review.

- 1.2.4 50—56 Sheen Road is a locally listed building (ref: 82/00850/BTM, [https://www.richmond.gov.uk/locally\\_listed\\_buildings](https://www.richmond.gov.uk/locally_listed_buildings)) and is within the Sheen Road Conservation Area designated by the LPA for being the historic route from Richmond to London and retaining high quality buildings, including some 18th century development ([https://www.richmond.gov.uk/media/13297/conarea31\\_a3\\_rgb.pdf](https://www.richmond.gov.uk/media/13297/conarea31_a3_rgb.pdf)).

## 1.3 Aims and objectives

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1.3.1 The aim of the assessment is to:

- identify the presence of any known or potential buried heritage assets that may be affected by the proposals;
- describe the significance of such assets, as required by national planning policy (see section 9 for planning framework and section 10 for methodology used to determine significance);
- assess the likely impacts upon the significance of the assets arising from the proposals; and
- provide recommendations for further assessment where necessary of the historic assets affected, and/or mitigation aimed at reducing or removing completely any adverse impacts upon buried heritage assets and/or their setting.

## 2 Methodology and sources consulted

### 2.1 Sources

- 2.1.1 For the purposes of this report, documentary and cartographic sources including results from any archaeological investigations in the site and the area around it were examined in order to determine the likely nature, extent, preservation and significance of any buried heritage assets that may be present within the site or its immediate vicinity. This information has been used to determine the potential for previously unrecorded heritage assets of any specific chronological period to be present within the site.
- 2.1.2 In order to set the site into its full archaeological and historical context, information was collected on the known historic environment features within a 500m-radius study area around it, as held by the primary repositories of such information within Greater London. These comprise the Greater London Historic Environment Record (GLHER) and the Museum of London Archaeological Archive (MoL Archaeological Archive). The GLHER is managed by Historic England and includes information from past investigations, local knowledge, find spots, and documentary and cartographic sources. The MoL Archaeological Archive includes a public archive of past investigations and is managed by the Museum of London. The study area was considered through professional judgement to be appropriate to characterise the historic environment of the site and agreed with Louise Davies, GLASS Archaeology Adviser, by email on 22-03-2022. Occasionally there may be reference to assets beyond this, where appropriate, e.g., where such assets are particularly significant and/or where they contribute to current understanding of the historic environment.
- 2.1.3 The extent of investigations as shown on Fig 2 may represent the site outline boundary for planning purposes, rather than the actual area archaeologically investigated. Where it has not been possible from archive records to determine the extent of an archaeological investigation (as is sometimes the case with early work), a site is represented on Fig 2 only by a centrepoint.
- 2.1.4 In addition, the following sources were consulted:
- MOLA – in-house Geographical Information System (GIS) with statutory designations GIS data, the locations of all ‘key indicators’ of known prehistoric and Roman activity across Greater London, past investigation locations, projected Roman roads; georeferenced published historic maps; and archaeological publications;
  - Historic England – information on statutory designations including scheduled monuments and listed buildings, along with identified Heritage at Risk;
  - Groundsure – historic Ordnance Survey maps from the first edition (1860–70s) to the present day;
  - British Geological Survey (BGS) – solid and drift geology digital map; online BGS geological borehole record data;
  - Bridges Fund Management Ltd – architectural drawings (Acroyd Lawrie, 2021), existing site survey (Mobile Cad Surveying Solutions, 2021);
  - Internet – web-published material including the LPA local plan, and information on conservation areas and locally listed buildings.
- 2.1.5 The assessment included a site visit carried out on the 30th of March 2022 in order to determine the topography of the site and existing land use/the nature of the existing buildings on the site, and to provide further information on areas of possible past ground disturbance and general historic environment potential. Observations made on the site visit have been incorporated into this report.

### 2.2 Methodology

- 2.2.1 Fig 2 shows the location of known historic environment features within the study area. These have been allocated a unique assessment reference number (**DBA 1, 2**, etc), which is listed in a gazetteer at the back of this report and is referred to in the text. Where there are a

considerable number of listed buildings in the study area, only those within the vicinity of the site are included, unless their inclusion is considered relevant to the study. Conservation areas and archaeological priority areas are not shown. All distances quoted in the text are approximate (within 5m) and unless otherwise stated are measured from the approximate centre of the site.

- 2.2.2 Section 10 sets out the criteria used to determine the significance of heritage assets. This is based on four values set out in Historic England's *Conservation principles, policies and guidance* (EH 2008), and comprise evidential, historical, aesthetic and communal value. The report assesses the likely presence of such assets within (and beyond) the site, factors which may have compromised buried asset survival (i.e. present and previous land use), as well as possible significance.
- 2.2.3 Section 11 includes non-archaeological constraints. Section 12 contains a glossary of technical terms. A full bibliography and list of sources consulted may be found in section 13 with a list of existing site survey data obtained as part of the assessment.

## 3 The site: topography and geology

### 3.1 Site location

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- 3.1.1 The site is located at 50–56 Sheen Road, TW9 (NGR 518336 175019: Fig 1). The site area is 0.13ha and is bounded by Sheen Road to the south, Church Road to the west, Sydney Road to the north and a residential building at 58–60 Sheen Road to the east. The site falls within the historic parish of Sheen and lay within the county of Surrey prior to being absorbed into the administration of the London Borough of Richmond-Upon-Thames.
- 3.1.2 The site lies 755m to the north-east of the River Thames, on the eastern outskirts of the historic town of Richmond.

### 3.2 Topography and geology

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- 3.2.1 Topography can provide an indication of suitability for settlement, and ground levels can indicate whether the ground has been built up or truncated, which can have implications for archaeological survival. The underlying natural geology of a site can also provide an indication of suitability for early settlement, and potential depth of remains.
- 3.2.2 The site area is located on the steep slope of Richmond Hill, the summit of which lies at 44.4m above Ordnance Datum (OD), 1.5km south of the site. Along Church Road ground levels are recorded rising from north to south from 7.8m OD, 270m to the north of the site to 20.4m OD, 200m to the south of the site.
- 3.2.3 Legacy spot height data from the OS shows that at the junction of Church Road and Sheen Road, 38m to the south-west of the site, ground levels are recorded at 12.5m OD, while at the junction of Church Street and Sydney Road, 33m to the north-west of the site, ground levels are recorded at 9.4m OD.
- 3.2.4 According to the BGS, the underlying geology of the site comprises Kempton Park Gravel in the northern part of the site and London Clay in the central and southern part of the site.
- 3.2.5 The depth of natural geology in the site as an indicator of possible archaeological survival is discussed in detail in section 5.2.

## 4 Archaeological and historical background

### 4.1 Overview of past investigations

- 4.1.1 No past archaeological investigations have been carried out within the site itself. Within the study area around the site 13 archaeological investigations have been undertaken, comprising five evaluations (**DBA 1, 2, 5, 6 and 12**) and eight watching briefs (**DBA 3, 4, 7–11 and 13**).
- 4.1.2 Most of them revealed only late post-medieval features and deposits (**DBA 3, 4, 8, 9 and 11**) or no archaeological features at all (**DBA 1, 5, 6 and 10**). Medieval remains were found in two sites in the form of horticultural soil (**DBA 2**) and a gully (**DBA 12**). 'Residual prehistoric struck flints and burnt flints (i.e. mixed with material of later date) were found in one investigation (**DBA 12**).
- 4.1.3 As shown on Fig 2, all the archaeological investigations within the study area have been undertaken in the north-western quadrant, thus they provide some, but limited, understanding of the past human activity of the area.
- 4.1.4 The results of these investigations, along with other known sites and finds within the study area, are discussed by period, below. The date ranges given are approximate.

### 4.2 Chronological summary

#### *Prehistoric period (800,000 BC–AD 43)*

- 4.2.1 The Lower (800,000–250,000 BC) and Middle (250,000–40,000 BC) Palaeolithic saw alternating warm and cold phases and intermittent perhaps seasonal occupation. During the Upper Palaeolithic (40,000–10,000 BC), after the last glacial maximum, and in particular after around 13,000 BC, further climate warming took place and the environment changed from steppe-tundra to birch and pine woodland. It is probably at this time that Britain first saw continuous occupation. Erosion has removed much of the Palaeolithic land surfaces and finds are typically residual. There are no known finds dated to this period within the study area.
- 4.2.2 The Mesolithic hunter-gatherer communities of the postglacial period (10,000–4000 BC) inhabited a still largely wooded environment. The river valleys would have been favoured in providing a dependable source of food (from hunting and fishing) and water, as well as a means of transport and communication. Evidence of activity is characterised by flint tools rather than structural remains. There are no known finds dated to this period within the study area.
- 4.2.3 The Neolithic (4000–2000 BC), Bronze Age (2000–600 BC) and Iron Age (600 BC–AD 43) are traditionally seen as the time of technological change, settled communities and the construction of communal monuments. Farming was established and forest cleared
- 4.2.4 cultivation. An expanding population put pressure on available resources and necessitated the utilisation of previously marginal land.
- 4.2.5 In 1994, an archaeological evaluation by MoLAS (now MOLA) at 10–12 Parkshot (**DBA 12**), 380m to the north-west of the site, revealed undated prehistoric struck flint and residual struck and burnt flints in later deposits. A possible paleochannel was recorded during a watching brief undertaken by PCA in 2005 at Land at United Reformed Church and Church Hall (**DBA 13**), 400m to the north-west of the site. Other than these finds, the GLHER records several findspots in the study area dated to the Palaeolithic (**DBA 14 and 17**), Neolithic (**DBA 17**) and Bronze Age (**DBA 14 and 16**).
- 4.2.6 These artefactual finds suggest that prehistoric occupation took place in the area, probably exploiting the well-drained and fertile gravels in close proximity to the predictable resources of the River Thames, which would have provided game, fish, and raw materials such reeds.

#### *Roman period (AD 43–410)*

- 4.2.7 Within approximately a decade of the arrival of the Romans in AD 43, the town of *Londinium* had been established on the north bank of the Thames where the City of London now stands, 15km to the north-west of the site. It quickly rose to prominence, becoming a major commercial

centre and the hub of the Roman road system in Britain. Small settlements, typically located along the major roads, supplied produce to the urban population, and were markets for *Londinium's* traded and manufactured goods (MoLAS, 2000, 150).

- 4.2.8 The 1994 archaeological evaluation at 10–12 Parkshot (**DBA 12**), 380m to the north-west of the site, revealed one sherd of Roman pottery. A hoard comprising 17 Roman coins was found in 1960 – 66 at 1 Denbigh Gardens (**DBA 18**), 480m to the south-east of the site.
- 4.2.9 There is evidence to suggest Roman occupation at Brentford, 3km north of the site, Kingston-upon-Thames, 5km south of the site, and Twickenham, 3km to the south-west of the site (Sampson 1997, 9) but no substantial evidence for Roman occupation within the vicinity of the site, which may have been woodland or open fields during this period.

#### *Early medieval (Saxon) period (AD 410–1066)*

- 4.2.10 Following the withdrawal of the Roman army from England in the early 5th century AD, *Londinium* was apparently abandoned. Germanic ('Saxon') settlers arrived from mainland Europe, with occupation in the form of small villages and an economy initially based on agriculture. By the end of the 6th century a number of Anglo-Saxon kingdoms had emerged, and as the ruling families adopted Christianity, endowments of land were made to the church. Landed estates (manors) can be identified from the 7th century onwards; some, as Christianity was widely adopted, with a main 'minster' church and other subsidiary churches or chapels.
- 4.2.11 In the 9th and 10th centuries, the Saxon Minster system began to be replaced by local parochial organisation, with formal areas of land centred on settlements served by a parish church.
- 4.2.12 Kingston, 5km to the south of the site, was an important Saxon royal "vill" or manor. Part of the Kingston Hundred, it is first mentioned in 836–838 as the site where King Egbert and Archbishop Ceolnoth bound the crown of the West Saxon kings to the See of London heralding the start of the unification of the Saxon kingdoms. It is likely that this act is the cause for the practice of crowning Anglo-Saxon kings in the 10th century on the 'coronation stone' (VCH *Surrey* iii 487–501). Seven Saxon kings of England are known to have been crowned here, the first being Edward the Elder in AD 900 and the last Ethelred in AD 979 (ibid).
- 4.2.13 There are no known early medieval sites or finds within the study area. Richmond does not appear in the Domesday survey of AD 1068. Along with Kew, it probably formed part of the extensive royal manor of Kingston (VCH *Surrey* iii 481). The land is likely to have been woodland or open fields throughout this period.

#### *Later medieval period (AD 1066–1485)*

- 4.2.14 At the end of the 11th century the site fell within the manorial estate of Sheen. The place name "Sheen" is possibly derived from 'Sciene', an area of natural beauty, or 'Sceon', a plural form of hut or shed (kepn.nottingham.ac.uk). The manor was created in c 1126 by King Henry I, and remained in royal hands until King John passed it to the freemen of the town in AD 1200 (VCH *Surrey* iii 501–516). Henry I divided the land surrounding the new manor into "Upper Field" and "Lower Field"; the demarcation between the fields roughly lining up with the present Paradise Road and Sheen Road (Dunbar 1966: 1), the latter forming the south boundary of the site. Hence, the site lies within the extent of what was Upper Field on the boundary with Lower Field.
- 4.2.15 The principal medieval feature of Richmond was the Palace, on the Thames riverside (outside the study area 850m south-west of the site), which originated as the old manor house of Shene. During the 13th century the palace underwent a program of enlargement by Henry III to accommodate the growing royal court. The GLHER point (**DBA 15**), 330m west of the site, may be the location of a manor house moved from Byfleet as temporary accommodation while Henry V rebuilt the Palace in the early 15th century (Richmond Council website). Along with its extensive grounds and deer park, Richmond Palace served mainly as a seasonal residence for the royal family of England, providing sport such as 'tourneys' (tournaments) and hunts for the monarch and their court (Dunbar 1966, 3). It was not until the 14th century that the palace became a permanent residence.
- 4.2.16 The Old Deer Park, 1km north-west of the site, was originally land granted to the Carthusian and Augustinian orders of monks by King Henry V in a bid to assuage the guilt of his father's role in the murder of Richard II. The Reformation of the Church by Henry VIII stripped the order

of its lands, but it was not until James I that these were incorporated into a 370 acre park. The name “Old Deer Park” was adopted after Charles I created Richmond Park 2.5km south-east of the site, in 1637 (VCH *Surrey* iii 533-546).

- 4.2.17 In the early 13th century a chapel was constructed on what is now the Church of St. Mary Magdalene (**DBA 7**), 450m to the south-west of the site. The chapel at Richmond is mentioned in a document giving the advowson of Kingston and the four chapels of Petersham, Sheen, East Molesey, and Thames Ditton to the newly constructed Merton Abbey (*ibid*).
- 4.2.18 Occupation during this period was focused beside the Palace, the church and the riverfront to the south-west of the site. An archaeological evaluation at 10–12 Parkshot (**DBA 12**), 380m to the north-west of the site revealed medieval agricultural features (i.e. a large pit and a gully). In 2008, a watching brief conducted at Duke Street (**DBA 2**), 400m to the west of the site, recorded medieval agricultural deposits, suggesting that during the later medieval period the area surrounding the site was open land, probably used for agriculture.
- 4.2.19 The location of the site in the Upper Field, some distance from the focus of settlement, suggests that the site is likely to have been used for arable cultivation or possibly pasture throughout this period.

#### *Post-medieval period (AD 1485–present)*

- 4.2.20 Richmond Palace, 850m to the west of the site, was destroyed by fire in 1497 and rebuilt in 1501 by King Henry VII. During this time the name of the town changed from Sheen to Richmond, after the King’s earldom in Yorkshire. In the successive centuries, the Palace was extended and rebuilt several times by the various monarchs that resided there. After the execution of Charles I the Palace was sold by the government, but later restored to the monarchy in 1660, but only the gate and a few buildings remained (VCH *Surrey* iii, 487–501). In 1770, the site of the Palace was intended for redevelopment, and although foundations were laid out the proposed work never started.
- 4.2.21 In the 1770s, Richmond Bridge, comprising five stone arches, was constructed 750m to the south-west of the site. The river crossing led to the growth of the town, which was centred along the riverfront and The Green. The land surrounding the site remained open fields during the early development of the town, although by the 18th century the main settlement had extended to land adjacent to the site. Rocque’s map of 1754 (Fig 3) shows the settlement concentrated along the edge of the River Thames and around Richmond Green. The site lies within an area labelled “Thieves Harbour” with small buildings to the west and east of the site, however the site itself appears to be in a field used as pasture.
- 4.2.22 The map of the Manor of Sheen of 1771 (Fig 4) shows the site still in a field, but with boundaries laid out to form long narrow parcels, possibly reflecting the beginnings of suburban development.
- 4.2.23 In 1846, the main railway line to London was constructed 165m to the north of the site. Since that time the development and expansion in the town boomed, the population rising from 9,255 in 1851 to 22,684 in 1891 and 25,577 in 1901 (VCH *Surrey* iii 533–587).
- 4.2.24 The Ordnance Survey 1st edition 25”-mile map of 1861 (Fig 5) shows the site occupied by two pairs of semi-detached houses aligned along Marsh Gate Road to the south (later named Sheen Road), with their entrances to the side, and rear gardens extending to the north.
- 4.2.25 Ordnance Survey mapping suggests little change on the site until the middle of the 20th century when, as shown on the Ordnance Survey 1:1,250 scale map of 1960 (Fig 6), the site appears to have gone through some redevelopment. The westernmost house (number 50) was extended to north; and no division is shown between this house and number 52. A new central entrance had been built joining together numbers 52 and 54, and in the north-west corner of the site a small building was added in part of the previous rear gardens of numbers 50 and 52. From Sydney Road a square yard or car park was laid out on part of the previous rear gardens of numbers 54 and 56.
- 4.2.26 The Ordnance Survey 1:1,250 scale map of 2003 (Fig 7) shows the site as currently occupied by the Richmond Inn Hotel. The building has been extended within the west side of the site along Church Road and Sidney Road, and the four houses facing Sheen Road incorporated to form the Hotel façade. In order to build the extension, the sloping ground to the rear was terraced and lowered to the depth of the 19th century basements, to form the current lower ground floor.

# 5 Statement of significance

## 5.1 Introduction

- 5.1.1 This section discusses historic impacts on the site which may have compromised archaeological survival from earlier periods, identified primarily from historic maps, and information on the likely depth of deposits.
- 5.1.2 This is followed by an assessment of the likely potential for archaeological remains to be present in the site (high, moderate, low, or no potential if it is clear that any archaeological remains will have already been removed by past ground disturbance); and – in accordance with the NPPF – a statement of the significance (high, medium, low, or negligible) of the known or likely remains in the site. This is based on current understanding of the baseline conditions, past impacts, and professional judgement.

## 5.2 Factors affecting archaeological survival

### *Levels of natural geology*

- 5.2.1 There have not been archaeological or geotechnical investigations within the site, therefore nearby archaeological investigations and data from the BGS online database will be used to provide an idea of the anticipated levels of natural geology within the site.
- 5.2.2 Data from past archaeological investigations within the study area have recorded natural deposits at these levels: 6.3m OD, 410m west of the site (**DBA 2**); 8.3m–9.4m OD, 320m west of the site (**DBA 3**); 6.2m–8.5m OD, 370m west of the site (**DBA 4**); 7.9m–8.2m OD, 380m south-west of the site (**DBA 6**); and 12.2m OD, 160m south-west of the site (**DBA 9**).
- 5.2.3 According to the BGS website, the nearest boreholes were located c 300m to the west of the site in the Princess Street redevelopment (TQ17NE177, TQ17NE150 and TQ17NE151 in Table 1) and c 280m north-west of the site in 34–43 The Quadrant Richmond 2 (TQ17NE331 in Table 1). The top of the natural Clay was recorded between 3.7 and 2.6m OD and was overlaid by natural Gravel up to a maximum level of 7.6m OD. In two boreholes the Gravel was capped by a sandy silty clay deposit (0.3–0.7m thick). Modern made ground, comprising tarmac, bricks and concrete was found at the top of all of these boreholes.

*Table 1: summary of geotechnical data  
Levels are in metres Ordnance Datum (m OD)*

BH/TP ref.	Top of modern made ground	Sandy silty clay	Natural Gravel	Top of natural Clay
TQ17NE177	9.0	7.3–7.0	7.0–3.1	3.1
TQ17SE151	9.0	-	7.1–2.6	2.6
TQ17SE150	9.0	-	7.6–3.7	3.7
TQ17NE331	7.6	6.7–6.0	6.0–3.0	3.0

- 5.2.4 Since there have not been any archaeological or geotechnical investigations within the site, or in its close proximity, and because of the steep slope of Richmond Hill, it is quite difficult to conjecture at what level the natural deposits are likely to be found within the site. However, we can assume that to the north of the site the natural deposits could be found at a depth of c 12.0
- 5.2.5 m OD, sloping down to a level comprised between 8.50m and 7m OD to the south. Natural deposits are likely to be overlaid by garden soils and/or made ground.

### *Past impacts*

- 5.2.6 The construction of the semi-detached houses in the 19th century will have had an impact on any earlier archaeological remains within the site, especially in the southern part where their basements and current lower ground floor will have truncated the underlying deposits within their footprints to at least c 10.4m OD. The northern part of the area, occupied by the gardens, would have been less affected by this development and earlier archaeological remains, if any, may have survived below the levels of garden cultivation.



- 5.2.7 However, with the construction of the present Richmond Inn Hotel which entailed the terracing and lowering of part of the area once occupied by gardens, any archaeological remains which may have survived beneath will have been removed to the formation level of the extension.
- 5.2.8 To the front of the building, along Sheen Road, an area c 5.6m wide used as garden and patio shows ground level as high as 12.2m OD, which is consistent with the street levels recorded nearby. This area seems to have not gone through major development when the Richmond Inn Hotel was established, hence it is possible that archaeological remains may survive in this area.

#### *Likely depth and thickness of archaeological remains*

- 5.2.9 To the front of Richmond Inn Hotel, where the area has not been affected by terracing, and the currently open area to the north-east of the hotel, any archaeological remains would be found directly under the modern ground surface and any modern made ground.
- 5.2.10 In the rest of the site (the hotel building's footprint), archaeological survival is expected to be low. However, deeply cut features such as pits or ditches could survive just below the building foundations.

### 5.3 Archaeological potential, and significance of likely remains

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- 5.3.1 The nature of possible archaeological survival in the area of the proposed development is summarised here, taking into account the levels of natural geology and the level and nature of later disturbance and truncation discussed above.

#### *Statement of Significance*

- 5.3.2 *The site has a low potential to contain archaeological remains dated to the prehistoric period.* The location of the site on the terrace gravels close to the resources of the River Thames would have made the area an ideal location for settlement. Despite this, there is little evidence of prehistoric activity in the area apart from undated worked flints which were found during an evaluation 380m to the north-west of the site, and a few findspots. Previous cultivation and development are likely to have removed much of the ancient land surface across the site.
- 5.3.3 *The site has a low potential to contain archaeological remains dated to the Roman period.* Although the area would have been suitable for settlement and farming, there is very little evidence dated to this period within the study area; only one piece of Roman pottery has been recorded, from an investigation 380m to the north-west of the site (**DBA 12**). It is possible that Roman occupation in the area was focussed in the area of Kingston, 5.0km to the south, or Brentford 2.7km to the north.
- 5.3.4 *The site has a low potential to contain archaeological remains dated to the early and later medieval periods.* The site lay some distance from the main settlement of Richmond. It is likely that the site remained within fields throughout this period. Remains in the form of agricultural features such as field ditches, or waste pits, might be found, although they are likely to have been truncated by past development on the site.
- 5.3.5 *The site has a moderate potential to contain archaeological remains dated to the post-medieval period.* The site was located within fields until the 19th century when two pairs of semi-detached houses and their gardens were built. When the area to the rear was terraced for the Richmond Inn Hotel extension, it is likely that any garden features were removed, but such remains could survive in the areas of the site which have not been built on. These, and any remains associated with the 19th century houses, in the form of rubbish and cess pits, and yard surfaces, would be of **low** significance, based on their limited evidential and historical value.

## 6 Impact of proposals

### 6.1 Proposals

- 6.1.1 The proposal includes the demolition of the modern extensions facing Church Road and Sydney Road and the lowering of the current lower ground floor by c 1.2m (Ivan Rodriguez, Sustainability Director at Bridges Fund Management, pers. comm, 24-04-2022). Under the existing buildings on Sheen Road, the walls will be underpinned and concrete strip foundations will be put in place, whereas for the new extension at the back, concrete pad foundations will be used (Dave Probert, Senior Engineer at Elliot Wood, pers. comm., 31-03-2022).
- 6.1.2 Landscaping will include planting beds adjacent the building and along the perimeter to minimum of 0.45m deep and a few tree pits, which will need to be c 1m deep (Marie Shirley Smith, Associate at Camlins, pers. comm., 31-03-2022).
- 6.1.3 New services and drainage trenches are also proposed, including a geocellular attenuation tank installed towards the northern boundary of the site which will have a depth of 1.5m deep (Harry Hunter, Senior Civil Engineer at Elliot Wood, pers. comm., 31-03-2022).

### 6.2 Implications

- 6.2.1 The identification of physical impacts on buried heritage assets within a site takes into account any activity which would entail ground disturbance, for example site set up works, remediation, landscaping and the construction of new basements and foundations. As it is assumed that the operational (completed development) phase would not entail any ground disturbance there would be no additional archaeological impact and this is not considered further.
- 6.2.2 It is outside the scope of this archaeological report to consider the impact of the proposed development on upstanding structures of historic interest, in the form of physical impacts which would remove, alter, or otherwise change the building fabric, or predicted changes to the historic character and setting of historic buildings and structures within the site or outside it.
- 6.2.3 The site has a low potential for prehistoric, Roman and medieval remains, and a moderate potential for post-medieval remains.

#### *Preliminary site works and breaking out of foundation slab*

- 6.2.4 Works carried out as part of the initial site set up, including preliminary site stripping and demolition, the installation of any site fencing and welfare facilities, as well as breaking out of the existing foundation/floor slab is assumed for the purpose of this assessment to cause ground disturbance to a maximum depth of 0.5mbgl, removing any archaeological remains within the footprint of the work to this depth.

#### *Underpinning and new foundations*

- 6.2.5 This would entail the removal of any archaeological remains within the footprint of each intrusion to a typical depth of 1.0–1.5mbgl as assumed for the purpose of this assessment. It is possible that the base of any deeply cut archaeological features such as pits would remain intact beneath these impact levels.

#### *Attenuation tank*

- 6.2.6 Excavation for the new tank would remove any archaeological remains within its footprint, to its formation level.

#### *Services / utilities trenches / drains*

- 6.2.7 The excavation of new service trenches and drains would extend to a depth of 1.5mbgl as assumed for the purposes of this assessment. This would remove shallow features, whereas deeply cut features may survive.

### *Landscaping*

- 6.2.8 The removal of existing trees and the planting of new ones would entirely remove or severely disturb any archaeological remains at the tree location.

## 7 Conclusion and recommendations

- 7.1.1 There are no designated heritage assets such as scheduled monuments or listed buildings within the site and it is not in an Archaeological Priority Area (APA).
- 7.1.2 There is low potential for prehistoric, Roman and medieval remains within the site.
- 7.1.3 The construction of houses in the 19th century will have had an impact on any earlier archaeological remains within the site, especially in the southern part where the basements would have removed any deposits within their footprints to a depth of c 10.4m OD. The northern part of the site, occupied by their gardens, would have been less affected by the development and it is possible that features such as agricultural pits or ditches survive, together with 19th century garden features, beneath the modern ground surface and landscaping in the central and north-east part of the site which has never been built on. The construction of the modern extension of the Richmond Inn Hotel, which entailed the terracing and lowering of part of the area once occupied by the gardens, will have removed any archaeological remains to a similar depth as the house basements, but less deeply to the north as the natural ground levels slope down.
- 7.1.4 To the front of the building, along Sheen Road, an area used as garden and patio shows ground levels consistent with the adjacent street and seems to have not gone through major development, hence it is possible that archaeological remains may survive below the modern ground surface.
- 7.1.5 The proposed scheme comprises the demolition of the modern extensions facing Church Road and Sydney Road and the construction of a new extension with concrete pad foundations and a finished level 1.2m below the current lower ground floor. Under the building along Sheen Road the existing walls will be underpinned and a mass concrete strip foundations will be excavated. The excavation of an attenuation tank, new service trenches and landscaping is anticipated. These works would have an impact up to 1.5mbgl and would severely truncate or remove any archaeological remains in their footprint.
- 7.1.6 Table 2 summarises the known or likely buried assets within the site, their significance, and the impact of the proposed scheme on asset significance.

*Table 2: Impact upon heritage assets (prior to mitigation)*

Asset	Asset Significance	Impact of proposed scheme
Post-medieval agricultural and garden features (moderate potential)	Low	Ground reduction, Excavation for strip and pad foundations, attenuation tank, landscaping and new services  <b>Significance of asset reduced to negligible</b>

- 7.1.7 Given the site's location, the limited potential for archaeological remains and their likely low significance, it is considered that no further archaeological investigations would be required in association with the proposed development.

## 8 Gazetteer of known historic environment assets

- 8.1.1 The gazetteer lists known historic environment sites and finds within the 500m-radius study area around the site. The gazetteer should be read in conjunction with Fig 2.
- 8.1.2 The GLHER data contained within this gazetteer was obtained on 29/03/2022 and is the copyright of Historic England 2022.
- 8.1.3 Ordnance Survey data © Crown copyright and database right 2022. Historic England statutory designations data © Historic England 2022. The Historic England GIS Designations Data contained in this material was obtained in March 2022. The most up to date publicly available Historic England GIS Data can be obtained from <http://www.historicengland.org.uk>.

### Abbreviations

AS – Archaeological Solutions

DGLA – Department of Greater London Archaeology (Museum of London)

ELO – English Heritage unique Event identifier

HER – Historic Environment Record

MAP – MAP Archaeological Practice

MLO – English Heritage unique Monument identifier

MoLAS – Museum of London Archaeology Service (now MOLA)

NHL – National Heritage List for England (Historic England)

PCA – Pre-Construct Archaeology

SAS – Sutton Archaeological Services

DBA No.	Description	Site code/ HER/NHL No.
1	<b>Park Lane [The Old School], Richmond</b> <i>Evaluation. AS 2016</i> The natural geology was present at 1.25–1.50m below the existing ground level and comprised a mid yellow and yellowish brown, loose, gravel with yellow and brown patches of sand. No archaeological features or finds were recorded.	ELO17721
2	<b>Duke Street, (Rear of Duke Street Baptist Church), Richmond</b> <i>Watching Brief. PCA 2008</i> Several layers of natural were recorded, overlaid with medieval horticultural soil. No other archaeological finds or features were recorded, but it was demonstrated that the development of Duke Street Baptist Church had not had any significant impact on the surrounding archaeological remains. Natural orange sandy gravel at 6.3m OD.	ELO7728 MLO99304
3	<b>Eton Street (No 12) / Union Court, Richmond</b> <i>Evaluation. MoLAS 2000</i> Four trenches were excavated revealing a 19th century red brick wall foundation which may have been an external wall of one of the houses observed on the 1894 map. Two late post-medieval pits were also revealed. The natural was encountered at 8.3m OD in the north of the site and up to 9.4m OD in the south of the site.	ELN00 ELO3232 MLO75098
4	<b>Lower George Street (1-5), Richmond</b> <i>Watching Brief. PCA 2011</i> The only feature identified during the works was a 20th century post medieval masonry wall, preserved within the later foundations of an adjacent extant modern building. The natural was recorded between 6.2 m OD at the northern end of the site and 8.50m OD at the southern end of the site.	ELO19723
5	<b>George Street (Nos 29-34), Richmond</b> <i>Evaluation. MoLAS 1992</i> The evaluation revealed modern truncation across the site. A ditch, interpreted as a property boundary, a well and rubbish pits were identified.	ELO10599 MLO63605 MLO63606 MLO63607
6	<b>Paradise Road (No. 10), London, Richmond</b> <i>Evaluation. SAS 2008</i> No archaeological features were discovered and the only material found was modern, such as glass and 20th century pottery sherds. Natural deposits of sand were found between 8.1m OD and 7.9m OD.	ELO10268

DBA No.	Description	Site code/ HER/NHL No.
7	<p><b>Paradise Road [St Mary Magdalene Church], Richmond</b>  <i>Watching Brief. MOLA 2018</i>            These works identified several structures in the north aisle which was built c. 1699, including a stepped red brick footing for a colonnade.            Adjoining fragmentary brick footing and a truncated foundation which possibly represented the remains of a north porch were identified.            Exposed masonry of the present north wall mainly comprised ununiform courses of red brick, but also blocks of Reigate Stone, it is thought that this was built c1699.            A row of brick pier bases for the north gallery which was built in 1864 and removed in 1904 were identified.            Other features identified in the course of the evaluation comprise, a burial vault capped with stone slabs, part of a possible brick-lined grave, three fragmentary unidentified structures and part of the Edwardian underfloor heating system.            Two lead coffins were also found.            In the south aisle several brick burial vaults and another lead coffin were identified, as was a row of brick burial vaults and a further lead coffin, a row of brick bases thought to have supported the south gallery, built in 1864-66 and removed in 1904 were also identified as was further evidence of the Edwardian underfloor heating system.            A brick burial vault, a brick structure of unknown function, several brick plinths which are thought to be related to the west gallery were identified in the nave.            Two coffins had nameplates, for a Miss Hester Hubbard (d 1779) and Dame Mary Pechell (d 1800).            Rubble foundations used for the Tudor tower built c 1487 were identified.            Works outside of the stair tower identified the original face of the Tudor tower built c 1487 and the later knapped flint exterior.            A possible doorway infilled with 17th century brick was cut through by the current external doorway.            The original access to the stair turret was identified to be from inside the tower and is now blocked.</p>	ELO19269
8	<p><b>George Street (No 22) [National Westminster Bank], Richmond</b>  <i>Watching Brief. MoLAS 1994</i>            The watching brief identified and recorded the remains of earlier structures on the site, the walls recorded are thought most likely to be of Georgian date, the associated mortar surfaced yard suggests that the associated walls survived into the later 19th century.</p>	GEO94 ELO3357 MLO64535 MLO64536
9	<p><b>Spring Terrace (No 4), Richmond</b>  <i>Watching Brief. PCA 2012</i>            The site revealed no archaeological features and some 19th to 20th century finds.            Natural gravels were observed at a height of 12.2m OD</p>	ELO12656
10	<p><b>Church Road (No 2) Richmond</b>  <i>Watching Brief. MAP 2012</i>            No archaeological finds or features were located.</p>	ELO12989
11	<p><b>Church Road (Nos 19-23), Richmond</b>  <i>Watching Brief. PCA 1995</i>            No archaeological finds or features were recorded, evidence of human activity being restricted to a 19th century garden wall and garden soils.</p>	CHD95 ELO2996
12	<p><b>Parkshot (Nos 10-12)/Kew Road (Nos 5-21), [Parkshot House], Richmond</b>  <i>Evaluation. MoLAS 1994</i>            Archaeological evidence dated to the prehistoric to post medieval period: 37 pieces of mainly residual prehistoric struck flint and 104 pieces of burnt flint were found; a single Roman potsherd; a large pit in association with a gully and alluvial deposits dated to the 12th century, sealed by a re-worked plough soil dated to 12th to 14th centuries; and a post medieval garden soil and associated cut features.</p>	PHK94 ELO4279 MLO61839 MLO61841 MLO61842 MLO61844 MLO61845 MLO61846
13	<p><b>Little Green/Quadrant Road, [Land at United Reformed Church and Church Hall], Richmond</b>  <i>Watching Brief. PCA 2005</i>            The watching brief revealed natural sands and gravels through which a possible palaeochannel cut. No brickearth deposits were observed suggesting widespread truncation of the area. The gravels were overlain by deposits of late post medieval made ground. Two late post medieval pits and a 19th century brick wall were observed.</p>	ELO6085

DBA No.	Description	Site code/ HER/NHL No.
14	<p><b>Richmond</b> <i>Findspot (Palaeolithic)</i> Two axes and two unretouched flakes found at Richmond.</p> <p><i>Findspot (Bronze Age)</i> Pegged, leaf shaped spearhead found June 1918.</p> <p><i>Findspot (Bronze Age)</i> Basal-looped spearhead found in 1885.</p>	MLO10647  MLO18970  MLO18988
15	<p><b>Sheen</b> <i>Manor House (Medieval)</i> Byfleet Manor house was moved to form part of Shene Palace during rebuilding by Henry V (1413–22).</p>	MLO19140
16	<p><b>Richmond Hill</b> <i>Findspot (Early Bronze Age to Late Bronze Age)</i> Part of bronze socketed spearhead.</p>	MLO23454
17	<p><b>Richmond</b> <i>Findspot (Palaeolithic)</i> Flint scraper.</p> <p><i>Findspot (Neolithic)</i> Flint arrowed; flint axed; flints.</p>	MLO18932  MLO18930 MLO18931 MLO18933 MLO18934 MLO19087
18	<p><b>1 Denbigh Gardens</b> <i>Findspot (Roman)</i> Seventeen coins (AD 70-400), found in 1960-66.</p>	MLO19111
19	<p><b>Paradise Road [Vineyard Passage Burial Ground], Richmond, TW10</b> <i>Cemetery (Georgian to 21st century)</i> Vineyard Passage Burial Ground was created as an extension to the Richmond parish churchyard of St Mary Magdalene, to the north-west, on the opposite side of Paradise Road. It was consecrated in 1790, enlarged in 1823 and received a restoration in the late 20th century with funds donated by the Metropolitan Public Gardens Association. The graves - which include several table tombs - line a footpath leading up to The Vineyard, with the vault arches visible in the brick wall alongside the path.</p>	MLO103983 MLO91294 MLO91285

# 9 Planning framework

## 9.1 National Planning Policy Framework

9.1.1 The revised National Planning Policy Framework (NPPF) was published on 20th July 2021 and sets out the government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous NPPF which was published in March 2012 with revisions in 2018 and 2019.

### *Conserving and enhancing the historic environment*

9.1.2 The NPPF section 16, "Conserving and enhancing the historic environment" is reproduced in full below:

**Para 189.** 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.

**Para 190.** Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay, or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

**Para 191.** When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

**Para 192.** Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

**Para 193.** Local planning authorities should make information about the historic environment, gathered as part of policymaking or development management, publicly accessible.

### **Proposals affecting heritage assets**

**Para 194.** 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.

**Para 195.** 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.

**Para 196.** Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

**Para 197.** 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.

**Para 198.** In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

### **Considering potential impacts**

**Para 199.** 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.

**Para 200.** 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.

**Para 201.** 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.

**Para 202.** 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.

**Para 203.** The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

**Para 204.** Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

**Para 205.** Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

**Para 206.** 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.

**Para 207.** 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 200 or less than substantial harm under paragraph 201, 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.

**Para 208.** Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

## 9.2 Regional policy

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### *The London Plan*

9.2.1 The overarching strategies and policies for the whole of the Greater London area are contained within *The London Plan: The Spatial Development Strategy for Greater London* (GLA 2021), adopted in March 2021.

9.2.2 Policy HC1 “Heritage conservation and growth” of the *Publication London Plan* relates to London’s historic environment.

A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
- 2) utilising the heritage significance of a site or area in the planning and design process
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

9.2.3 Para. 7.1.8 adds ‘Where there is evidence of **deliberate neglect** of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset

should not be taken into account when making a decision on a development proposal’.

- 9.2.1 Para 7.1.11 adds ‘Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains can be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site’s archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.

## 9.3 Local planning policy

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- 9.3.1 The London Borough of Richmond adopted their Local Plan in July 2018. It sets out policies and guidance for the development of the borough until July 2033 or until it is superseded. Policy LP3 applies to the borough’s heritage assets and states:

### **Policy LP3 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.

9.3.2 Policy LP7 applies to archaeology and it states:

**LP7 Archaeology**

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.

9.3.3 Two legal challenges were made regarding the adoption of the Local Plan. On 3rd March 2020, the Council adopted the two matters related to the legal challenges within the Local Plan.

9.3.4 Policy 33 applies to Archaeology and it states:

**A.** 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. This is in accordance with London Plan Policy HC1 Heritage conservation and growth.

**B.** 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

## 10 Determining significance

- 10.1.1 'Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity, and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):
- *Evidential value*: the potential of the physical remains to yield evidence of past human activity. This might take into account date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.
  - *Aesthetic value*: this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written;
  - *Historical value*: the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative;
  - *Communal value*: this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely bound up with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.
- 10.1.2 Consultation on draft revisions to the original *Conservation Principles* document which set out the four values was open from November 2017 until February 2018. The revisions aim to make them more closely aligned with the terms used in the NPPF (which are also used in designation and planning legislation): i.e. as archaeological, architectural, artistic and historic interest. This is in the interests of consistency, and to support the use of the Conservation Principles in more technical decision-making (HE 2017).
- 10.1.3 Table 2 gives examples of the significance of designated and non-designated heritage assets.

*Table 2: Significance of heritage assets*

Heritage asset description	Significance
World heritage sites Scheduled monuments Grade I and II* listed buildings Historic England Grade I and II* registered parks and gardens Protected Wrecks Heritage assets of national importance	Very high (International/ national)
Historic England Grade II registered parks and gardens Conservation areas Designated historic battlefields Grade II listed buildings Burial grounds Protected heritage landscapes (e.g. ancient woodland or historic hedgerows) Heritage assets of regional or county importance	High (national/ regional/ county)
Heritage assets with a district value or interest for education or cultural appreciation Locally listed buildings	Medium (District)
Heritage assets with a local (i.e. parish) value or interest for education or cultural appreciation	Low (Local)
Historic environment resource with no significant value or interest	Negligible
Heritage assets that have a clear potential, but for which current knowledge is insufficient to allow significance to be determined	Uncertain

- 10.1.4 Unless the nature and exact extent of buried archaeological remains within any given area has been determined through prior investigation, significance is often uncertain.

# 11 Non-archaeological constraints

- 11.1.1 It is anticipated that live services will be present on the site, the locations of which have not been identified by this archaeological report. Other than this, no other non-archaeological constraints to any archaeological fieldwork have been identified within the site.
- 11.1.2 Note: the purpose of this section is to highlight to decision makers any relevant non-archaeological constraints identified during the study, that might affect future archaeological field investigation on the site (should this be recommended). The information has been assembled using only those sources as identified in section 2 and section 13.4, in order to assist forward planning for the project designs, working schemes of investigation and risk assessments that would be needed prior to any such field work. MOLA has used its best endeavours to ensure that the sources used are appropriate for this task but has not independently verified any details. Under the Health & Safety at Work Act 1974 and subsequent regulations, all organisations are required to protect their employees as far as is reasonably practicable by addressing health and safety risks. The contents of this section are intended only to support organisations operating on this site in fulfilling this obligation and do not comprise a comprehensive risk assessment.

## 12 Glossary

<i>Alluvium</i>	Sediment laid down by a river. Can range from sands and gravels deposited by fast flowing water and clays that settle out of suspension during overbank flooding. Other deposits found on a valley floor are usually included in the term alluvium (e.g. peat).
<i>Archaeological Priority Area/Zone</i>	Areas of archaeological priority, significance, potential or other title, often designated by the local authority.
<i>Brickearth</i>	A fine-grained silt believed to have accumulated by a mixture of processes (e.g. wind, slope and freeze-thaw) mostly since the Last Glacial Maximum around 17,000BP.
<i>B.P.</i>	Before Present, conventionally taken to be 1950
<i>Bronze Age</i>	2,000–600 BC
<i>Building recording</i>	Recording of historic buildings (by a competent archaeological organisation) is undertaken 'to document buildings, or parts of buildings, which may be lost as a result of demolition, alteration or neglect', amongst other reasons. Four levels of recording are defined by Royal Commission on the Historical Monuments of England (RCHME) and Historic England. Level 1 (basic visual record); Level 2 (descriptive record), Level 3 (analytical record), and Level 4 (comprehensive analytical record)
<i>Built heritage</i>	Upstanding structure of historic interest.
<i>Colluvium</i>	A natural deposit accumulated through the action of rainwash or gravity at the base of a slope.
<i>Conservation area</i>	An area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. Designation by the local authority often includes controls over the demolition of buildings; strengthened controls over minor development; and special provision for the protection of trees.
<i>Cropmarks</i>	Marks visible from the air in growing crops, caused by moisture variation due to subsurface features of possible archaeological origin (i.e. ditches or buried walls).
<i>Cut-and-cover [trench]</i>	Method of construction in which a trench is excavated down from existing ground level and which is subsequently covered over and/or backfilled.
<i>Cut feature</i>	Archaeological feature such as a pit, ditch or well, which has been cut into the then-existing ground surface.
<i>Desk-based assessment</i>	A written document whose purpose is to determine, as far as is reasonably possible from existing records, the nature of the historic environment resource/heritage assets within a specified area.
<i>Devensian</i>	The most recent cold stage (glacial) of the Pleistocene. Spanning the period from c 70,000 years ago until the start of the Holocene (10,000 years ago). Climate fluctuated within the Devensian, as it did in other glacials and interglacials. It is associated with the demise of the Neanderthals and the expansion of modern humans.
<i>Early medieval</i>	AD 410–1066. Also referred to as the Saxon period.
<i>Evaluation (archaeological)</i>	A limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area.
<i>Excavation (archaeological)</i>	A programme of controlled, intrusive fieldwork with defined research objectives which examines, records and interprets archaeological remains, retrieves artefacts, ecofacts and other remains within a specified area. The records made and objects gathered are studied and the results published in detail appropriate to the project design.
<i>Findspot</i>	Chance find/antiquarian discovery of artefact. The artefact has no known context, is either residual or indicates an area of archaeological activity.
<i>Geotechnical</i>	Ground investigation, typically in the form of boreholes and/or trial/test pits, carried out for engineering purposes to determine the nature of the subsurface deposits.
<i>Head</i>	Weathered/soliflucted periglacial deposit (i.e. moved downslope through natural processes).
<i>Heritage asset</i>	A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets and assets identified by the local planning authority (including local listing).
<i>Historic Environment Record (HER)</i>	Archaeological and built heritage database held and maintained by the County authority. Previously known as the Sites and Monuments Record
<i>Holocene</i>	The most recent epoch (part) of the Quaternary, covering the past 10,000 years during which time a warm interglacial climate has existed. Also referred to as the 'Postglacial' and (in Britain) as the 'Flandrian'.
<i>Iron Age</i>	600 BC–AD 43
<i>Later medieval</i>	AD 1066 – 1500

<i>Last Glacial Maximum</i>	Characterised by the expansion of the last ice sheet to affect the British Isles (around 18,000 years ago), which at its maximum extent covered over two-thirds of the present land area of the country.
<i>Locally listed building</i>	A structure of local architectural and/or historical interest. These are structures that are not included in the Secretary of State's Listing but are considered by the local authority to have architectural and/or historical merit
<i>Listed building</i>	A structure of architectural and/or historical interest. These are included on the Secretary of State's list, which affords statutory protection. These are subdivided into Grades I, II* and II (in descending importance).
<i>Made Ground</i>	Artificial deposit. An archaeologist would differentiate between modern made ground, containing identifiably modern inclusion such as concrete (but not brick or tile), and undated made ground, which may potentially contain deposits of archaeological interest.
<i>Mesolithic</i>	12,000 – 4,000 BC
<i>National Record for the Historic Environment (NRHE)</i>	National database of archaeological sites, finds and events as maintained by Historic England in Swindon. Generally not as comprehensive as the county HER.
<i>Neolithic</i>	4,000 – 2,000 BC
<i>Ordnance Datum (OD)</i>	A vertical datum used by Ordnance Survey as the basis for deriving altitudes on maps.
<i>Palaeo-environmental</i>	Related to past environments, i.e. during the prehistoric and later periods. Such remains can be of archaeological interest, and often consist of organic remains such as pollen and plant macro fossils which can be used to reconstruct the past environment.
<i>Palaeolithic</i>	700,000–12,000 BC
<i>Palaeochannel</i>	A former/ancient watercourse
<i>Peat</i>	A build-up of organic material in waterlogged areas, producing marshes, fens, mires, blanket and raised bogs. Accumulation is due to inhibited decay in anaerobic conditions.
<i>Pleistocene</i>	Geological period pre-dating the Holocene.
<i>Post-medieval</i>	AD 1500–present
<i>Preservation by record</i>	Archaeological mitigation strategy where archaeological remains are fully excavated and recorded archaeologically and the results published. For remains of lesser significance, preservation by record might comprise an archaeological watching brief.
<i>Preservation in situ</i>	Archaeological mitigation strategy where nationally important (whether Scheduled or not) archaeological remains are preserved <i>in situ</i> for future generations, typically through modifications to design proposals to avoid damage or destruction of such remains.
<i>Registered Historic Parks and Gardens</i>	A site may lie within or contain a registered historic park or garden. The register of these in England is compiled and maintained by Historic England.
<i>Residual</i>	When used to describe archaeological artefacts, this means not <i>in situ</i> , i.e. Found outside the context in which it was originally deposited.
<i>Roman</i>	AD 43–410
<i>Scheduled Monument</i>	An ancient monument or archaeological deposits designated by the Secretary of State as a 'Scheduled Ancient Monument' and protected under the Ancient Monuments Act.
<i>Site</i>	The area of proposed development
<i>Site codes</i>	Unique identifying codes allocated to archaeological fieldwork sites, e.g. evaluation, excavation, or watching brief sites.
<i>Study area</i>	Defined area surrounding the proposed development in which archaeological data is collected and analysed in order to set the site into its archaeological and historical context.
<i>Solifluction, Soliflucted</i>	Creeping of soil down a slope during periods of freeze and thaw in periglacial environments. Such material can seal and protect earlier landsurfaces and archaeological deposits which might otherwise not survive later erosion.
<i>Stratigraphy</i>	A term used to define a sequence of visually distinct horizontal layers (strata), one above another, which form the material remains of past cultures.
<i>Truncate</i>	Partially or wholly remove. In archaeological terms remains may have been truncated by previous construction activity.
<i>Watching brief (archaeological)</i>	A formal programme of observation and investigation conducted during any operation carried out for non-archaeological reasons.



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## 13.2 Other Sources

British Geological Survey online historic geology borehole data and digital drift and solid geology data  
 Greater London Historic Environment Record  
 Groundsure historic Ordnance Survey mapping  
 Historic England designation data  
 Richmond Council website:  
[https://www.richmond.gov.uk/media/6334/local\\_history\\_richmond\\_palace.pdf](https://www.richmond.gov.uk/media/6334/local_history_richmond_palace.pdf)

## 13.3 Cartographic sources

Rocque, 1766 'Exact Survey of the City of London Westminster and Southwark and the Country 10 Miles Round', reproduced in Margary, H, 1971 '*Exact Survey of the City of London Westminster and Southwark and the Country 10 Miles Round*' by John Rocque, 1766, Margary in assoc Guildhall Library, Kent  
 Russell's map of the Manor of Sheen of 1771 (Richmond Local History Collection, ref. LM 0062R)

### *Ordnance Survey maps*

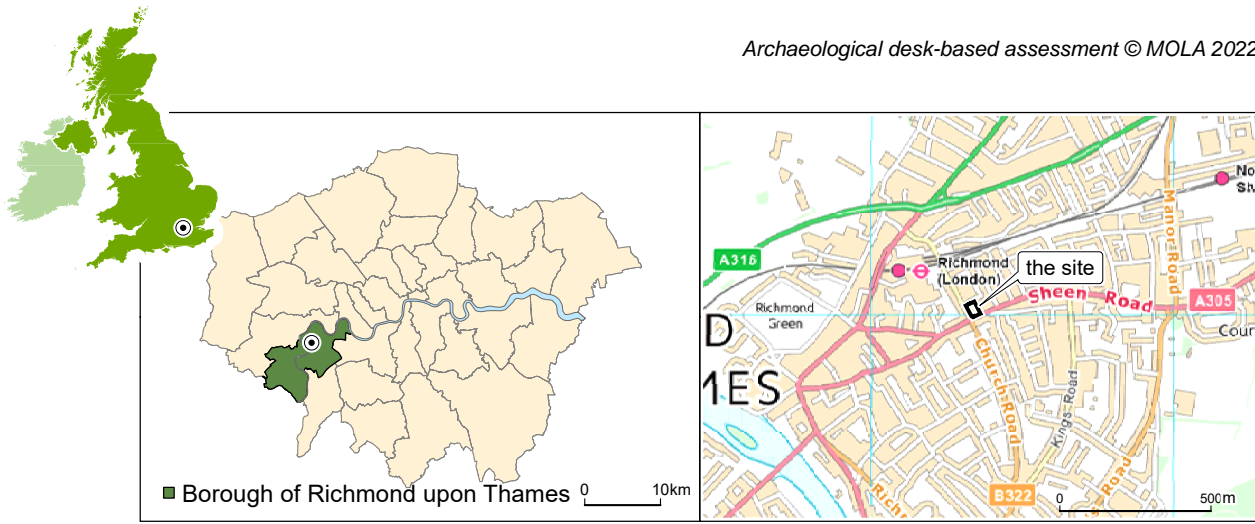
Ordnance Survey 1st edition 25" map (1861)  
 Ordnance Survey 2nd edition 25" map (1869)  
 Ordnance Survey 3rd edition 25" map (1896)  
 Ordnance Survey 25" maps (1913)  
 Ordnance Survey 1:2500 scale maps (1933, 1960)  
 Ordnance Survey 1:1250 scale maps (1971–74, 1982-83, 1989–91, 1992, 1995, 2003).

### *Engineering/Architects drawings*

Acroyd Lawrie, Proposed Section, dwg no 888-105\_Option 2, August 2021  
 Mobile Cad Surveying Solutions, Plan of existing lower ground floor with levels, dwg no. 2844-02, August 2021  
 Mobile Cad Surveying Solutions, Plan of existing ground floor with levels, dwg no. 2844-03, August 2021

## 13.4 Available site survey information checklist

Information from client	Available	Format	Obtained
Plan of existing site services (overhead/buried)	not known	-	N
Levelled site survey as existing (ground and buildings)	Y	pdf	Y
Contamination survey data ground and buildings (inc. asbestos)	not known	-	N
Geotechnical report	not known	-	N
Envirocheck report	not known	-	N
Information obtained from non-client source	Carried out	Internal inspection of buildings	
Site inspection	Y	Y	



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scale 1:500 @ A4

0 20m

Fig 1 Site location

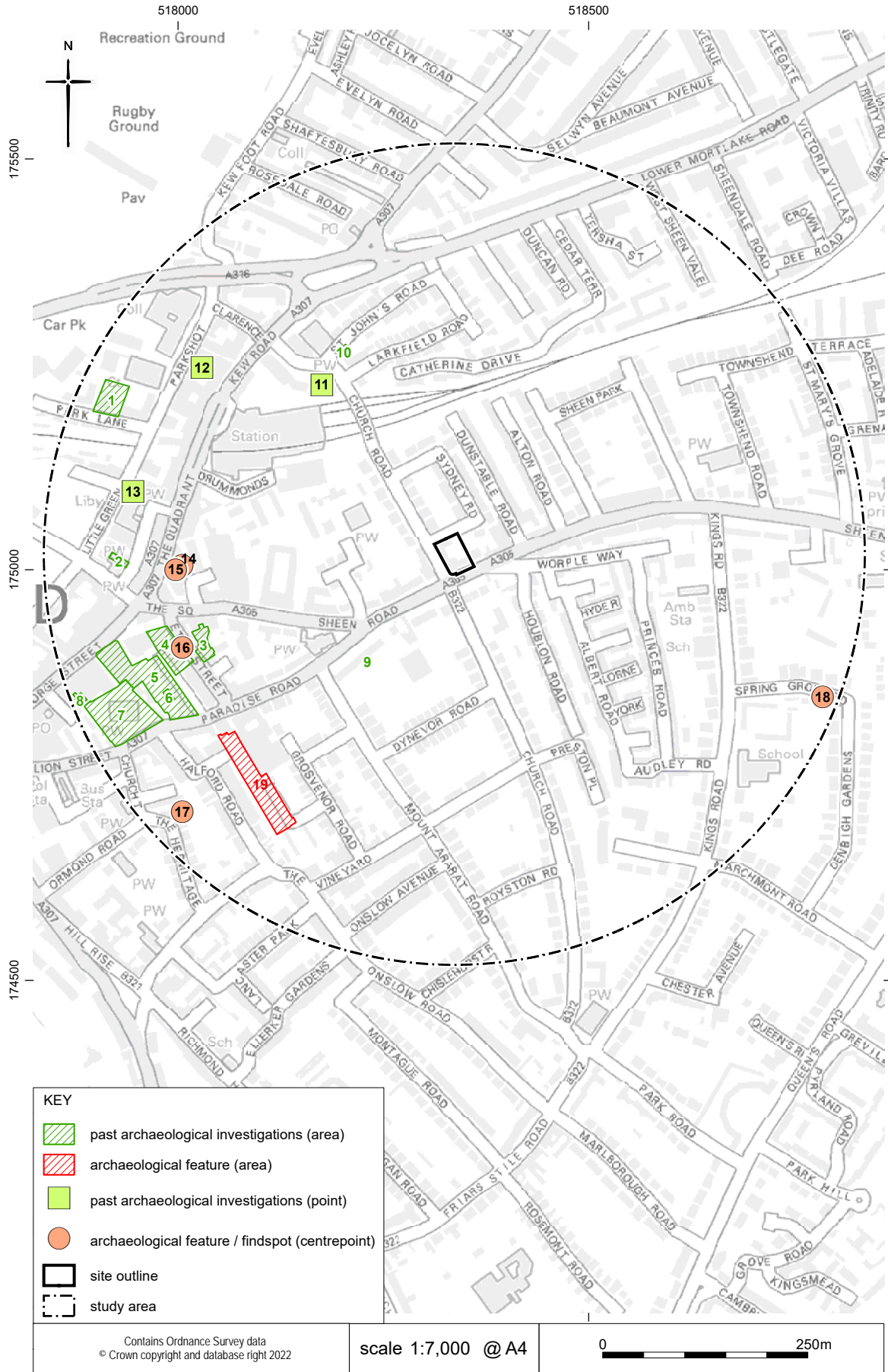


Fig 2 Historic environment features map

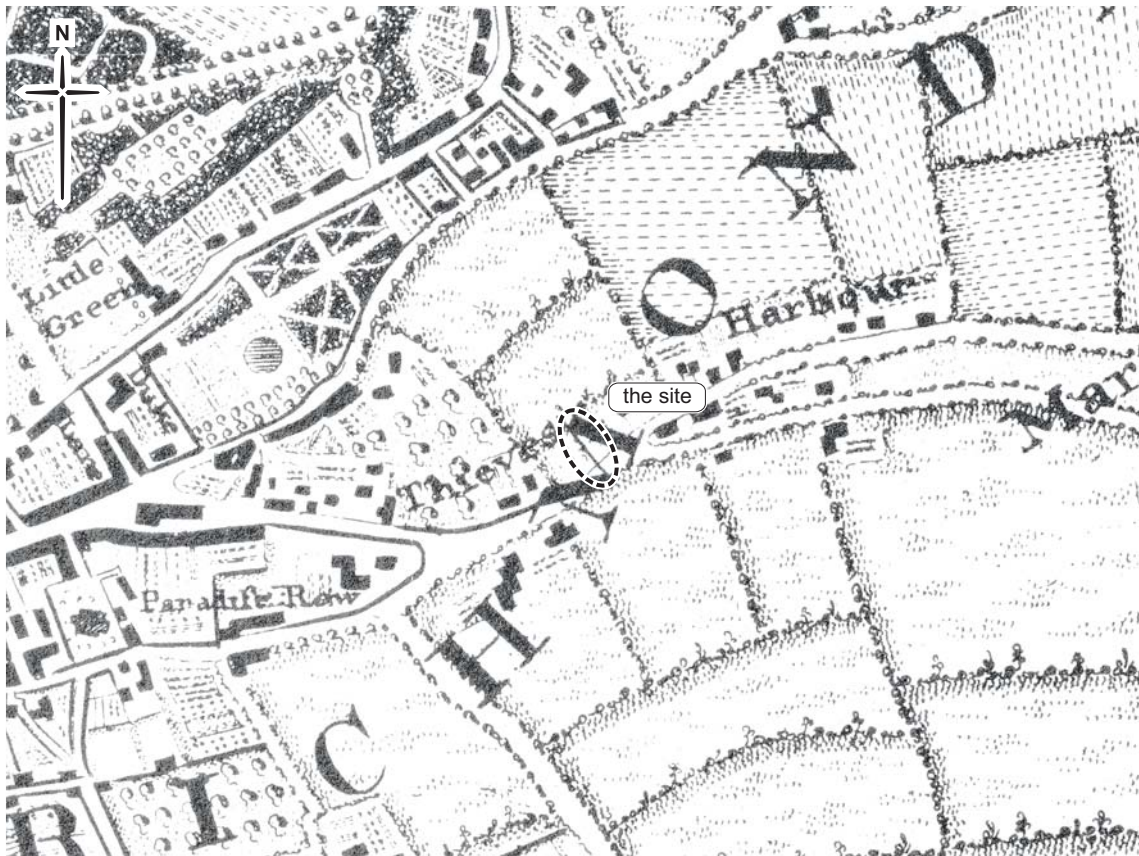


Fig 3 Rocque's map of 1754

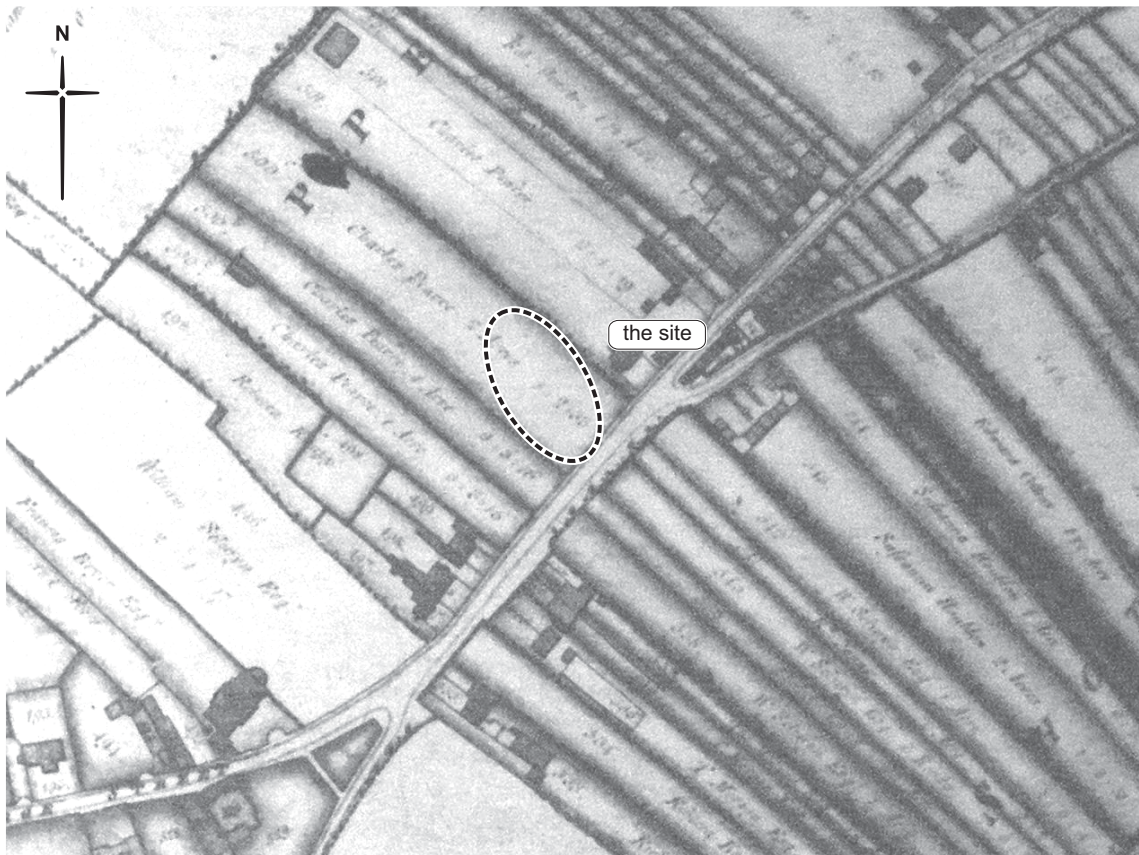


Fig 4 Map of the Manor of Sheen of 1771



Fig 5 Ordnance Survey 1st edition 25":mile map of 1861



Fig 6 Ordnance Survey 1:1250 scale map of 1960



Fig 7 Ordnance Survey 1:1250 scale map of 2003

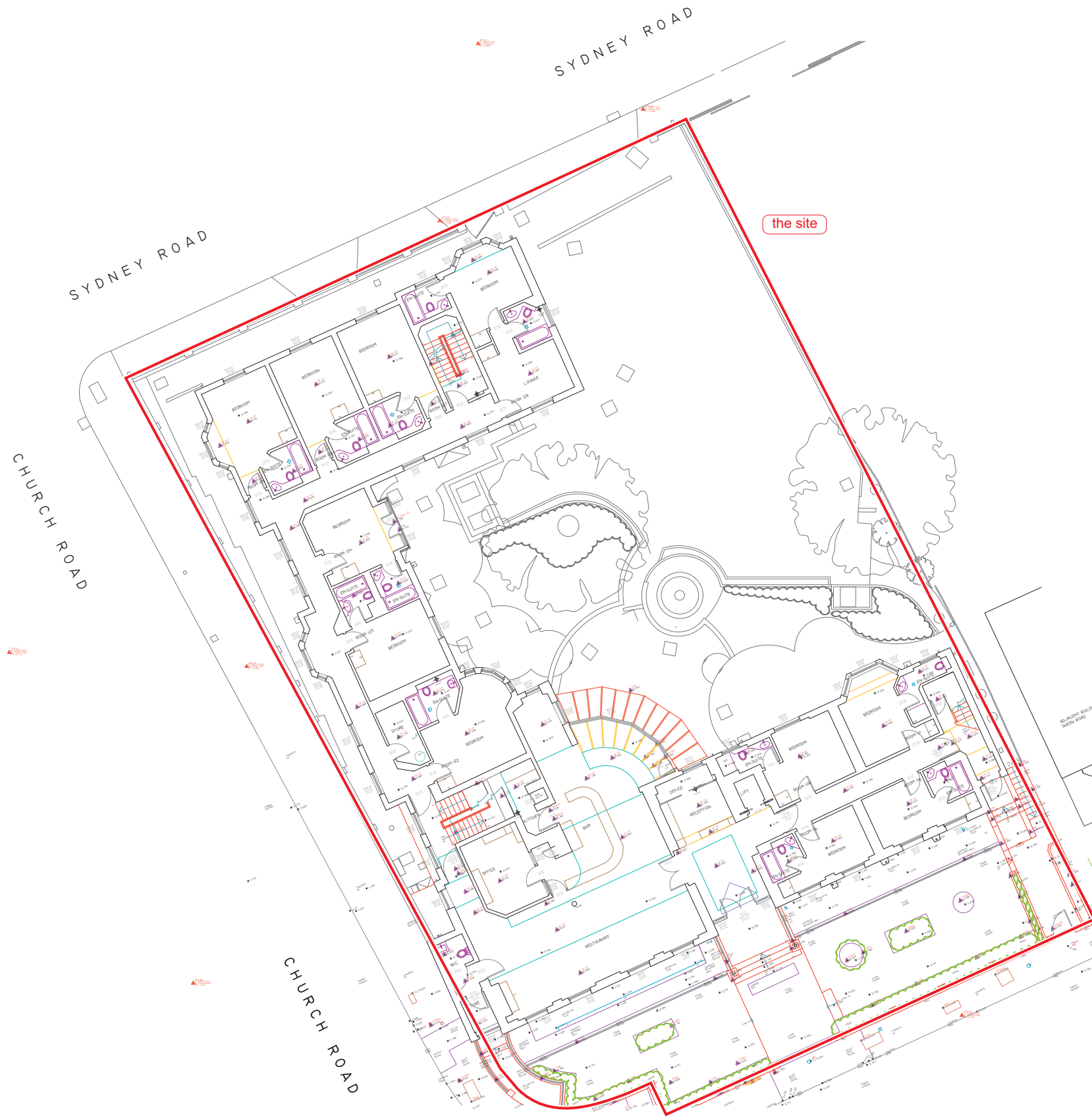


Fig 8 Plan of existing ground floor with levels (Mobile Cad Surveying Solutions, dwg no. 2844-03, August 2021)





Fig 9 Plan of existing lower ground floor with levels (Mobile Cad Surveying Solutions, dwg no. 2844-02, August 2021)



Fig 10 Richmond Inn Hotel from Sheen Road, looking north-east (MOLA photo, 30/03/2022)



Fig 11 Richmond Inn Hotel from Church Road, looking south-east (MOLA photo, 30/03/2022)



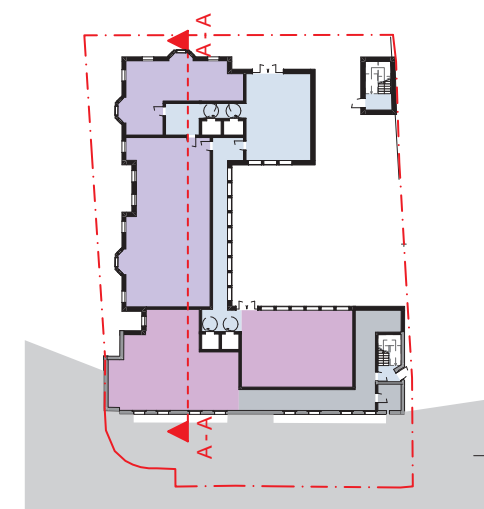
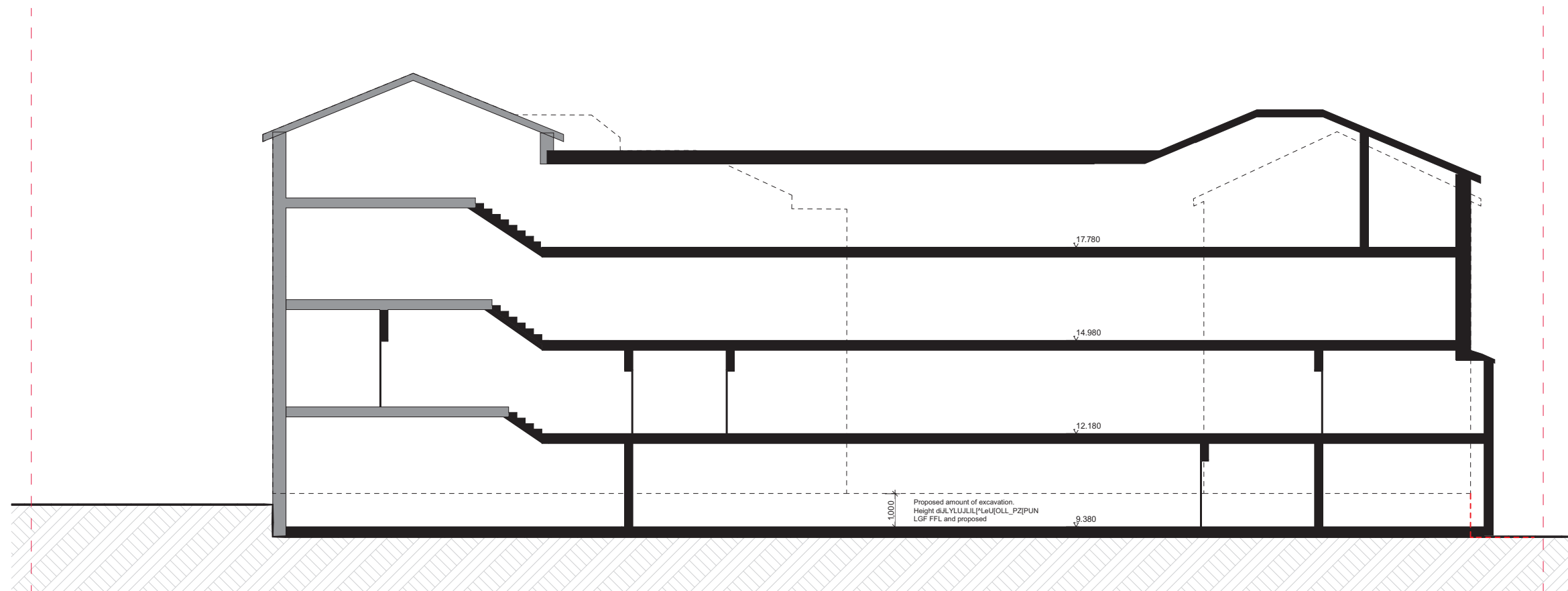
Fig 12 Carpark to the north of the hotel, looking north-west (MOLA photo, 30/03/2022)



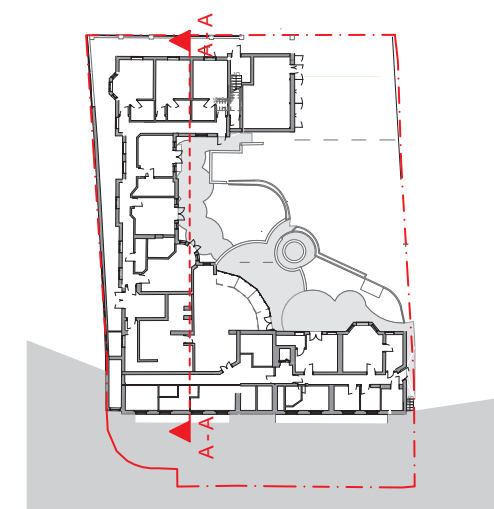
Fig 13 Carpark to the north of the hotel, looking north-east (MOLA photo, 30/03/2022)



Fig 14 Richmond Inn Hotel, front of the building showing lightwell and windows into lower ground floor, looking east (MOLA photo, 30/03/2022)



Option 2 Lower ground floor 1:500



Existing Lower ground floor 1:500

Fig 15 Proposed section (Ackroyd Lowrie, dwg no. 888-105\_Option 2, August 2021)