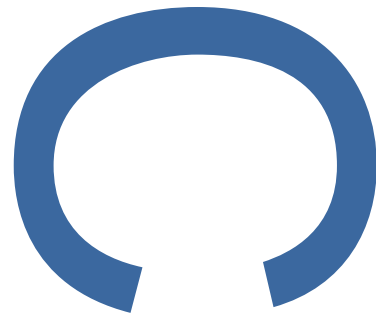
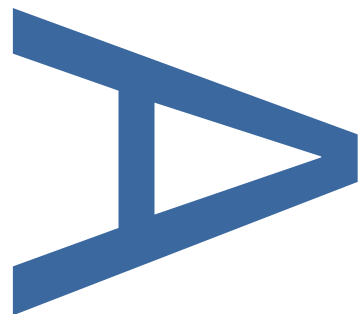


**Westminster House, Kew Road,
Richmond, London Borough of
Richmond, TW9 2ND**



**Archaeological Desk-Based
Assessment**



<i>Local planning authority</i>	London Borough of Richmond		
<i>PCA report no.</i>	R15699	<i>Site Code</i>	n/a
<i>PCA project no</i>	K8734	<i>Date</i>	December 23

PRE-CONSTRUCT ARCHAEOLOGY LIMITED

www.pre-construct.com

Project Information	
Site name	Westminster House, Kew Road, Richmond, London Borough of Richmond, TW9 2ND
Project type	Archaeological Desk-Based Assessment
Site address	Westminster House, Kew Road, Richmond, London Borough of Richmond, TW9 2ND
NGR	TQ 18075 75224
Local planning authority	London Borough of Richmond
Planning reference	[Company]
Commissioning client	Baden Prop Ltd
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1 NON-TECHNICAL SUMMARY

- 1.1 Pre-Construct Archaeology Limited was commissioned by Baden prop Ltd to undertake an archaeological Desk-Based Assessment in advance of the proposed redevelopment of the site at Westminster House, Kew Road, Richmond, London Borough of Richmond.
- 1.2 The proposed works include the creation of two additional levels of Class C3 accommodation, comprising seven units, as well as the conversion and excavation of the existing Class E basement and the part conversion of existing floorspace at basement, ground, first, second and third floor levels to provide internal access and ancillary residential floorspace with external alterations and associated development. The floor level of the converted basement is proposed to be lowered by 620mm.
- 1.3 This assessment aimed to gain, as far as reasonably possible from existing records, an understanding of the historic environment resource in a 500m search radius from the centre of the proposed development. It involved consultation with the Greater London Historic Environment Record (HER), an examination of relevant cartographic and documentary material and a visual inspection of the study site and its environs. Consideration was given to the significance of the archaeological potential in respect of guidelines outlined by Historic England within the criteria for National, Regional and Local significance.
- 1.4 The Desk-Based Assessment established that at the study site there is a low to moderate potential for prehistoric material, a low potential for Roman material, a low potential for Saxon material, a moderate potential for medieval evidence, a high potential for post-medieval material and a low potential for modern material.
- 1.5 However, despite the identified potential for medieval and post-medieval archaeological remains, the study site has seen considerable previous impacts, notably the current basement which encompasses the entire building footprint. The excavation of the basement will likely already have had a high impact on below ground deposits, potentially deep into the underlying natural strata. As such the archaeological potential of the site is negated by the previous impacts which suggests any potentially underlying archaeological remains will already have been removed.
- 1.6 The necessity for further archaeological work in advance of or during development may be decided by the local planning authority and their Archaeology Advisors at Historic England. It is considered that such work, if required, can be secured by a condition attached to planning consent. Any required archaeological work at the study site would have to be undertaken by an approved archaeological contractor, following the compilation of a 'Written Scheme of Investigation' which has been approved in advance by the Archaeological Advisors to the local planning authority.
-

2 INTRODUCTION

2.1 Outline

- 2.1.1 This archaeological Desk-Based Assessment has been commissioned by Baden Prop Ltd prior to the proposed redevelopment of the site at Westminster House, Kew Road, Richmond, London Borough of Richmond (Figures 1 & 2).
- 2.1.2 This report has been prepared in accordance with the standards specified by the Chartered Institute for Archaeologists (CIfA 2020).
- 2.1.3 An archaeological Desk-Based Assessment is undertaken in order that the local authority may formulate an appropriate response to any identified archaeological resource. The report aims to assess the archaeological potential of the site and to examine the likely impact of the proposed development upon the archaeological resource. This assessment may be followed by a requirement for further archaeological monitoring or investigation.
- 2.1.4 This archaeological Desk-Based Assessment was written and researched by Emily Bates for Pre-Construct Archaeology Ltd. Research has included a visit to the Richmond Local Studies Library, an examination of historical maps, relevant reports and publications, a search of the Greater London Historic Environment Record (GLHER) within a radius of 500m, and a site visit.

2.2 Report Objectives

- 2.2.1 As defined by the Chartered Institute for Archaeologists (CIfA 2020), an archaeological Desk-Based Assessment aims to:

Determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices that satisfy the stated aims of the project, and that comply with the Code of conduct and other relevant regulations of CIfA. In a development context, desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so), and will enable reasoned proposals and decisions to be made on whether to mitigate, offset or accept without further intervention that impact.

- 2.2.2 A Desk-Based Assessment should consist of:

An analysis of existing written, graphic, photographic and electronic information in order to identify the likely heritage assets, their interests and significance; the character of the study area, the nature, extent and quality of the known or potential archaeological, historic, architectural and artistic interest. Significance is to be judged in a local, regional, national or international context as appropriate.

- 2.2.3 The Desk-Based Assessment is required in order to assess the merit of the archaeological resource and lead towards one or more of the following:

- *The formulation of a strategy to ensure the recording, preservation or management of the resource.*
- *The formulation of a strategy for further investigation, whether or not intrusive, where the character and value of the resource is not sufficiently defined to permit a mitigation strategy or other response to be devised.*

- *The formulation of a proposal for further archaeological investigation within a programme of research*

2.2.4 The degree to which archaeological deposits survive on site will depend upon previous land-use and so consideration is given to the destructive effect of past and present activity from a study of the information available. In order that the appropriate archaeological response may be identified the impact of the proposed development is also considered.

2.3 Methodology

2.3.1 The **potential** for surviving archaeological evidence at the site is expressed in this report as ranging between the scales of:

- **High:** The available evidence suggests a high likelihood for past activity within the site and a strong potential for archaeological evidence to survive intact or reasonably intact;
- **Medium:** The available evidence suggests a reasonable likelihood for past activity within the site and a potential that archaeological evidence may survive although the nature and extent of survival is not thought to be significant;
- **Low:** The available evidence suggests archaeological evidence of significant activity is unlikely to survive within the site, although some minor land-use may have occurred.
- **Uncertain:** Insufficient information to assess.

2.3.2 Buried archaeological evidence cannot be 100% identified during a desk-based assessment. The assessed potential is based on available evidence but the physical nature and extent of any archaeological resource surviving within the site cannot be confirmed without detailed information on the below ground deposits or results of on-site fieldwork.

2.3.3 Where potential or known heritage assets are identified, the heritage **significance** of such assets is determined by reference to existing designations where available. For previously unidentified sites where no designation has been assigned, an estimate has been made of the likely historic, artistic or archaeological importance of that resource based on professional knowledge and judgement.

- **NATIONAL:** The highest status of asset, e.g. Scheduled Monuments (or undesignated assets of schedulable quality and importance), Grade I and Grade II* Listed Buildings. Well preserved historic landscape, whether inscribed or not, with exceptional coherence, time depth, or other critical factor(s)
- **REGIONAL:** Designated or undesignated archaeological sites; well preserved structures or buildings of historical significance, historic landscapes or assets of a reasonably defined extent and significance, or reasonable evidence of occupation / settlement, ritual, industrial activity etc. Examples may include burial sites, deserted medieval villages, Roman roads and dense scatter of finds.
- **LOCAL:** Undesignated sites with some evidence of human activity but which are in a fragmentary or poor state, or assets of limited historic value but which have the potential to

contribute to local research objectives, structures or buildings of potential historical merit. Examples include sites such as historic field systems and boundaries, agricultural features such as ridge and furrow, ephemeral archaeological evidence etc.

- **NEGLIGIBLE:** Historic assets with very little or no surviving archaeological interest or buildings and landscapes of no historical significance. Examples include destroyed antiquities, buildings of no architectural merit, or relatively modern landscape features such as quarries, field boundaries, drains and ponds etc.
- **UNKNOWN:** Insufficient information exists to assess the importance of a feature (e.g. unidentified features on aerial photographs).

2.3.4 Adjustments to the above classification are occasionally made, where appropriate; for some types of finds or sites where there is no consistent value and the importance may vary from local to national. Levels of importance for any such areas are generally assigned on an individual basis, based on professional judgement and advice.

2.3.5 The expected magnitude of the **impact** of the proposed development works is determined by identifying the level of effect from the proposed development upon the 'baseline' conditions of the site and the heritage resource identified in the assessment. This effect can be either adverse (negative) or beneficial (positive). In certain cases it is not possible to confirm the magnitude of impact upon a heritage resource, especially where anticipated buried deposits exist. In such circumstances a professional judgement is applied. The magnitude of impact are assessed using the following criteria.

2.3.6 For adverse (negative) impact:

- **HIGH:** Substantial impacts fundamentally changing the baseline condition of the receptor, leading to total or considerable alteration of character or setting – e.g. complete or almost complete destruction of the archaeological resource; dramatic visual intrusion into a historic landscape element; adverse change to the setting or visual amenity of the feature/site; significant increase in noise or changes in sound quality; extensive changes to use or access. Substantial harm to or loss of a Grade II listed building, park or garden. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, Grade I and II* listed buildings, Grade I and II* registered parks and gardens, and World Heritage Sites,
- **MEDIUM:** Impacts changing the baseline condition of the receptor materially but not entirely, leading to partial alteration of character or setting – e.g. a large proportion of the archaeological resource damaged or destroyed; visual intrusion into key aspects of the historic landscape; and changes in noise levels or use of a site that would result in detrimental changes to historic landscape character.
- **LOW:** Detectable impacts which alter the baseline condition of the receptor to a small degree; e.g. a small proportion of the surviving archaeological resource is damaged or

destroyed; minor severance, change to the setting or structure or increase in noise; and limited encroachment into character of a historic landscape.

- **NEGLIGIBLE:** Barely distinguishable adverse 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.

2.3.7 For beneficial (positive) impact:

- **NEGLIGIBLE:** Barely distinguishable beneficial change from baseline conditions, where there would be very little appreciable effect on a known site and little long term effect on the historic value of a resource.
- **LOW:** Minimal enhancement to key historic landscape elements, parcels or components, such as limited visual improvements or reduction in severance; slight changes in noise or sound quality; minor changes to use or access; resulting in a small improvement in historic landscape character.
- **MEDIUM:** Changes to key historic elements resulting in welcome changes to historic landscape character. For example, a major reduction of severance or substantial reductions in noise or disturbance such that the value of known sites would be enhanced.
- **HIGH:** Positive changes to most or all key historic landscape elements, parcels or components; visual changes to many key aspects of the historic landscape; significant decrease in noise or changes in sound quality; changes to use or access; resulting in considerable welcome changes to historic landscape character.

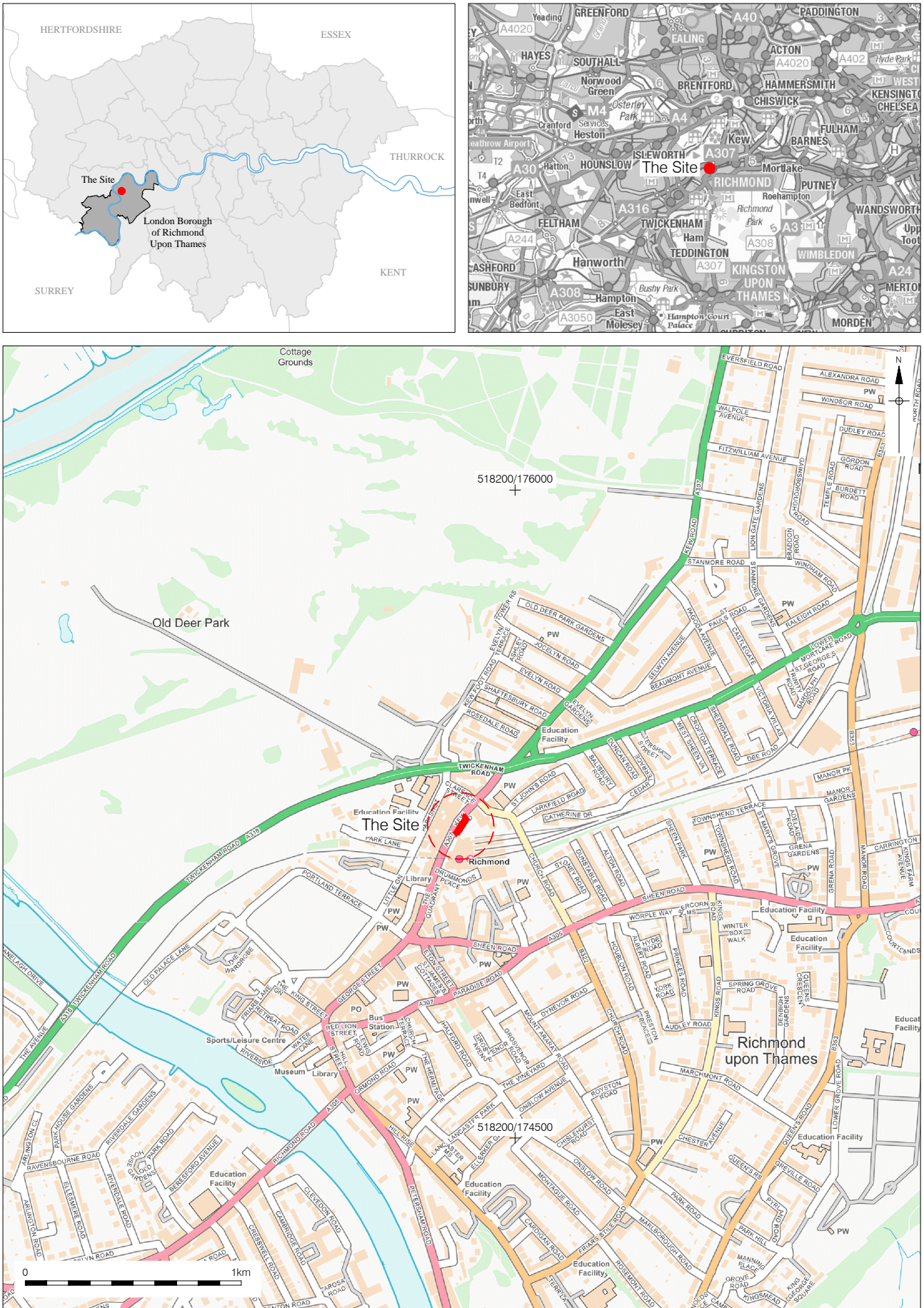




Figure 2
Detailed Site Location
1:500 at A4

3 THE SITE AND PROPOSED SCHEME

3.1 The Study Site

3.1.1 The study site is a sub-rectangular shaped plot, covering 0.04228 ha. The site is bordered by an access road to the north, Richmond Station Car Park to the east, the forecourt to Richmond Station to the south and Kew Road to the west. The site is located at central National Grid Reference TQ 18075 75224 and is situated within London Borough of Richmond (**Figures 1 and 2**).

3.1.2 The site is presently occupied by Westminster House, a four-storey building with commercial properties at ground level and offices on the higher levels. A basement level is known to exist across the entire footprint of the study site, containing storerooms, plant rooms and an electricity substation (Appendix 2, Plates 1-5).

3.1.3 Cartographic evidence suggests that the study site been subject to a moderate amount of development. The site is believed to have been located within agricultural land from at least the 18th century. A large building of unknown function was constructed across the northern end of the study site by 1868. This removed by 1960 and Westminster House was constructed across the study site by 1972.

3.2 The Proposed Scheme

3.3 The proposed works include the creation of two additional levels of Class C3 accommodation, comprising seven units, as well as the conversion and excavation of the existing Class E basement and the part conversion of existing floorspace at basement, ground, first, second and third floor levels to provide internal access and ancillary residential floorspace with external alterations and associated development. The floor level of the converted basement is proposed to be lowered by 620mm (**Figures 16-18**).

3.3.1 It is anticipated that any groundworks associated with the lowering of the basement are unlikely to impact archaeological remains as these will likely already have been removed by the excavation of the current basement.

3.3.2 The proposed development also includes the installation of a cycle stand on the pavement of Kew Road to the north of the site. The foundations for these are proposed to be 0.3m deep and as such are unlikely to impact on any potentially underlying archaeological remains.

3.3.3 Any groundworks associated with the development which occur outside the footprint of the current building at ground level, such as service trenches or attenuation tanks, risks the localised disturbance of any surviving archaeological deposits.

4 PLANNING BACKGROUND

4.1 The National Planning Policy Framework

4.1.1 The revised National Planning Policy Framework (NPPF) was published in September 2023 and replaces the previous NPPF published in July 2021. The NPPF constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications.

4.1.2 Chapter 16 of the NPPF concerns the conservation and enhancement of the historic environment, with the following statements being particularly relevant to the proposed development:

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.

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.

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.

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.

193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

4.1.3 Additionally:

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.

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.

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.

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.

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.

4.1.4 In considering any planning application for development, the local planning authority will now be guided by the updated policy framework set by the NPPF.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

4.2 The London Plan

- 4.2.1 The London Plan, updated and published in March 2021, includes the following policy regarding the historic environment in central London, which should be implemented through the Local Development Framework (LDF) being compiled at the Borough level:

Policy HC1 Heritage conservation and growth

- 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.*

4.3 **Regional Guidance: Richmond's Local Plan**

- 4.3.1 Richmond Council's Local Plan was adopted on 3 July 2018 and contains the following policies of relevance to the study site.

Policy LP 3

Designated Heritage Asset

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

- 1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.*
 - 2. Resist the demolition in whole, or in part, of listed building. Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II* and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset.*
 - 3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place.*
 - 4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.*
-

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

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

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

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

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

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

1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;

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

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

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

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

Policy LP 4 Non-Designated Heritage Assets

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

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

Policy LP 7 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.

4.4 **Richmond Archaeological Priority Area (APA)**

4.4.1 The study site does not lie within a local authority designated Archaeological Priority Area.

4.4.2 Two Archaeological Priority Areas lie in close proximity to the north and south of the site:

- **Richmond Tier II APA 2.6 Richmond Town**

The APA covers the historic area of Richmond Town and surrounds the Richmond Palace Tier 1 APA, and river area. It is classified as a Tier 2 APA because it is a historic settlement of medieval origin with demonstrated potential for buried remains relating to the development of the town. It is a settlement with a unique character; neither a normal small market town or a typical rural village and is closely associated with the Tier I Richmond Palace APA, the Shene Charterhouse Scheduled Monument (also a Tier 1 APA) and Syon Abbey, Isleworth.

- **Richmond Tier II APA 2.5 Old Deer Park**

The Old Deer Park APA covers the former royal Hunting Park. It is a Tier II APA given its strong historical ties to Richmond Palace, the Shene Charterhouse (a Carthusian monastery established by Henry V) and its inclusion within the designated area of the Kew Gardens World Heritage Site Buffer Zone and Registered Park and Garden.

5 GEOLOGY AND TOPOGRAPHY

5.1 Geology

- 5.1.1 The British Geological Survey of England and Wales (bgs.ac.uk) indicates that the study site is located upon a natural bedrock geology of London Clay Formation - clay and silt. This sedimentary bedrock formed between 56 and 47.8 million years ago during the Palaeogene period. The natural bedrock geology is overlain by a superficial deposit of Kempton Park Gravel Member - sand and gravel. This sedimentary superficial deposit formed between 116 and 11.8 thousand years ago during the Quaternary period.
- 5.1.2 An archaeological evaluation and watching brief at Richmond Adult Community College, approximately 130m to the northwest of the study site, encountered loose mid yellowish-orange gravelly sands, interpreted as Kempton Park River Terrace gravels. These deposits of natural gravels were encountered at between 6.58m OD in the south of the site and 7.10m OD in the north of the site (Hawkins 2013).
- 5.1.3 An archaeological watching brief at the Duke Street Baptist Chapel, approximately 250m to the southwest of the study site, encountered natural orange sandy gravel, at a depth of 6.30m OD. This was overlain by a deposit of natural gravelly sand, which was encountered at a depth of 6.95m OD (Douglas 2008).
- 5.1.4 The course of the River Thames lies approximately 700m to the southwest of the study site. The course of Beverley Brook lies approximately 2.75km to the southeast of the study site.

5.2 Topography

- 5.2.1 A site visit undertaken by the author indicated that the study site slopes noticeably from the north to the south, such that the ground level on the southeast of the study site is located at the basement level of the building (see Appendix 2, Plates 3 & 4). This indicates potential truncation of the natural ground level at this location. Westminster House is located at between approximately 12.0m OD and 10.0m OD (**Figure 2**).

6 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

6.1 Introduction

6.1.1 In order to assess the potential of the archaeology within the development area, an examination of all archaeological entries in the Greater London Historic Environment Record (GLHER) has been made within a 500m radius from central point TQ 18075 75224. The search area is defined as the 'study area' for the purposes of this assessment. A complete listing of these entries is provided in Appendix 1 and is presented in Figure 3.

6.1.2 The purpose of the GLHER search is to identify known archaeological sites and finds in the vicinity in order to predict the likely archaeological conditions within the development area itself. It is important to understand that many of the entries in the GLHER result from chance discoveries and may therefore represent a small and unrepresentative sample of the total buried heritage.

6.1.3 The information derived from the GLHER is supplemented by other archaeological, documentary, and cartographic resources.

6.2 Prehistoric

6.2.1 The riverside alluvium and gravel terrace deposits in which the study site is located provide conditions which are often associated with prehistoric settlement, as the gravel terraces would have provided good agricultural land, in close proximity to a fresh water source. Limited prehistoric material culture has been discovered within the Richmond area and along the riverbank of the Thames, although there is not yet enough evidence to demonstrate prehistoric settlement within the wider Richmond area (Historic England 2022).

6.2.2 The HER records several findspots of prehistoric material culture from across the study area. This includes two Palaeolithic flint axes, two Palaeolithic flint flakes and two Bronze Age spearheads, recovered from unspecified locations in Richmond during the late 19th and early 20th centuries (**Figure 3: 2**). Additionally, part of a Bronze Age socketed spearhead is reported to have been found on Richmond Hill (**Figure 3: 4**).

6.2.3 Archaeological investigations within the study area give further evidence for prehistoric material culture. An archaeological evaluation at Parkshot House, on the opposite side of Kew Road to the study site, recovered 37 pieces of struck flint and 104 pieces of burnt flint. While these were largely residual in nature, some were found in subsoil horizons which were interpreted as potentially being prehistoric in nature (Surrey Archaeological Society 1995, **Figure 3: 1**). A further prehistoric worked flint was encountered during an archaeological evaluation at 16-17 George Street, from a deposit which also contained 12th-13th century pottery (Greenwood and Maloney 1994, **Figure 3: 3**).

6.3 Roman

6.3.1 A scattering of Roman material culture has been recovered from across the wider Richmond area.

This includes the chance finds of Roman objects recovered from along the Thames, including Roman coins and a pewter vase. Residual Roman finds have also been removed from archaeological investigations within the wider Richmond area. On the opposite side of the Thames, evidence for a Roman farmstead has been discovered at Heathcote Road in Twickenham and a Roman settlement is known to have been located at Brentford. However, there is no definitive evidence for a Roman settlement within Richmond at this time (Historic England 2022).

6.3.2 There is only one entry of Roman date recorded in the GLHER from within the study area. This refers to a residual piece of Roman pottery, encountered during the archaeological evaluation at Parkshot House (Surrey Archaeological Society 1995, **Figure 3: 4**).

6.4 **Saxon**

6.4.1 Shene, as Richmond was known prior to the 16th century, is believed to originate from the Saxon word *sceo*, meaning shelter. It is first recorded in 950, in Bishop Thodred's will, in which he disposed of his holdings at Fulham, Wimbledon and Shene. Shene is believed to have made up a part of the large manor of Kingston during the Saxon period and it has been suggested that Kingston's manor house may have been located at Shene at this time (Cloake 1991, Malden 1911).

6.4.2 At the end of the Saxon period, Kingston is recorded as a large settlement, under the control of King William, comprised of 86 villagers, 14 smallholders and 2 slaves. Its resources included 32 ploughlands worth of arable land, 40 acres of meadow, enough woodland to sustain 6 pigs, 5 mills, 3 fisheries and 1 church (www.opendomesday.org).

6.4.3 There are no entries of Saxon date recorded in the GLHER from within the study area.

6.5 **Medieval**

6.5.1 Shene manor house (**Figure 3: 8**) is first recorded in the 12th century, when Henry I granted it to the Belet family. By the 14th century, the manor house had reverted back into royal hands, at which point it was converted into a palace, with a moat and associated hunting grounds. In 1414, Shene Palace was rebuilt and a Carthusian monastery known as Shene Charterhouse was founded in what is now the Old Deer Park. The monastery was surrounded by large grounds, largely utilised as agricultural land supplying Shene Charterhouse. Shene Palace was partially destroyed at the end of the 15th century and was rebuilt by Henry VII in 1501, at which point it was renamed Richmond Palace (Cloake 1991, Historic England 2022, Malden 1911).

6.5.2 The remains of the surrounding hunting grounds associated with Shene Palace have been preserved in what has since become the Royal Botanic Gardens and the Old Deer Park (**Figure 3: 10**). Additional open space at Richmond Green and Little Green is known to have been utilised for jousting and pageants, as well as common land during this period (**Figure 3: 9**).

- 6.5.3 The settlement of Shene, which also became known as Richmond in 1501, presumably developed around the manor house and later palaces, although little detail is known about the settlement during this period (Historic England 2022).
- 6.5.4 Several archaeological investigations within the study area give evidence to the nature of the surrounding area at this time. The archaeological evaluation at Parkshot House recorded a pit and a gully of probable 12th century date, overlain by a deposit believed to represent a reworked plough soil. An additional deposit, dated to the 12th to 13th century, is believed to represent a waterlain flood deposit (Surrey Archaeological Society 1995, **Figure 3: 6**). The archaeological evaluation at 16-17 George Street encountered a deposit containing 12th to 13th century pottery, a medieval boundary or drainage ditch and potential beam slots and postholes, which may indicate a structure fronting onto George Street (Greenwood and Maloney 1994, **Figure 3: 7**). Finally, an archaeological watching brief at the Duke Street Baptist Chapel encountered a deposit of medieval horticultural soil (Douglas 2008, **Figure 3: 11**).
- 6.6 **Post-Medieval**
- 6.6.1 In 1604, James I created a new park for Richmond Palace. This included much of the former Charterhouse lands located surrounding the monastery. The park was known as The New Park of Richmond until 1637, at which point Charles I created a much larger deer park, now Richmond Park, to the south and The New Park became known as the Old Deer Park. It remained a part of the royal landscape until the 19th century, at which point it was separated from what is now Kew Gardens (Cloake 1991, Historic England 2022, **Figure 3: 19**).
- 6.6.2 In the late 17th century, Richmond began to grow from a small village linked to the palace into a small town in its own right, attracting wealthy merchants looking to invest in new properties, as well those wishing to take advantage of the clear air outside of London, while remaining in close proximity to the city (Cloake 1991).
- 6.6.3 The growing urban nature of the surrounding area is recorded in several entries of an early post-medieval date recorded in the GLHER from within the study area. Cut features dating from the 17th to 18th centuries, believed to be garden features related to large properties known to have been located in the area, were discovered during the archaeological evaluation at Parkshot House, directly opposite to the study site (Surrey Archaeological Society 1995, **Figure 3: 12**). An archaeological evaluation on George Street encountered 17th to 18th century boundary ditches, a well and the foundations of buildings (Hoad 1992, **Figure 3: 16**). Finally, a row of early 18th century residential properties is recorded at 31-35 Kew Road (**Figure 3: 20**).
- 6.6.4 The first consulted cartographic source to show the study site is Rocque's map from 1746 (**Figure 4**). This map shows the settlement of Richmond largely concentrated to the southwest of the study site, with residential development spreading along the lines of what is now Parkshot and Kew Road. The Old Deer Park can be seen to the west of Parkshot and the Little Green to the

southwest of the study site. The study site itself can be seen to be located within undeveloped, presumably agricultural land at this time.

- 6.6.5 The Plan of Royal Manor of Richmond from 1771 (**Figure 5**) shows a much more detailed view of the surrounding area in the late 18th century. Individual residential properties are now seen along Kew Road and Parkshot and individual fields and their owners are labelled. The study site can be seen to be located within a single plot of land, labelled as Barn Close at this time. It is recorded as owned by William Selwyn Esq., who can be seen to own several other large fields in the surrounding area.
- 6.6.6 Richmond continued to grow and develop into the later post-medieval period, as evidenced by several entries recorded in the GLHER from within the study area. Two late post-medieval pits and a 19th century brick wall foundation, believed to be associated with a residential property, were discovered during an archaeological evaluation at 12 Eton Street and Union Court (Cowan 2000, **Figure 3: 13**). The archaeological evaluation at 16-17 George Street encountered 18th and 19th century brick walls, representing the residential properties fronting George Street at this time (Greenwood and Maloney 1994, **Figure 3: 14**). Finally, a watching brief at nearby 22 George Street encountered the remains of buildings and an associated yard surface, believed to be Georgian in date (Birley 1994, **Figure 3: 15**).
- 6.6.7 The next consulted cartographic source is Driver's map of Richmond from 1842 (**Figure 6**). Several changes can be seen within the surrounding area at this time, including two public houses, to the north and the west of the study site. To the south of the study site, the line of the Southwestern railway can now be seen, with Richmond Station and a station yard depicted to the southwest of the study site. The study site itself can be seen to be located within undeveloped land at this time.
- 6.6.8 The new Southwestern railway line through Richmond opened in July 1846, with great success. Its popularity resulted in an extension to Windsor being constructed in 1848, requiring a new railway bridge across the Thames and a new station at Richmond, to the north of the original one. This station was rebuilt yet again in 1869 when its services were further extended and again in 1937, to create a combined railway and underground station (Cloake 1991).
- 6.6.9 The Richmond Tithe Map from 1852 (**Figure 7**) shows the newly constructed railway station to the south of the study site, as well as St John's Church to the northeast. While the surrounding area is shown in little detail at this time, a large building of unknown function can now be seen immediately to the north of the study site. The study site itself can be seen to be located wholly within a single plot of land, labelled as 14. The corresponding apportionment records plot 14 as owned and occupied by the South Western Railway Company and in use as meadow.
- 6.6.10 The Ordnance Survey Map from 1868 (**Figure 8**) shows the surrounding area in much greater detail. More development can be seen to have taken place along Kew Road at this time, including
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residential properties, a timber yard and a school. The study site can be seen to remain within a large plot of land, which appears to have a landscaped border surrounding it. A large building of unknown function can be seen to cross into the northern end of the study site at this time.

6.6.11 The next consulted cartographic source is the Ordnance Survey Map from 1898 (**Figure 9**). Further development can be seen across the surrounding area, especially to the northwest of the study site. To the southeast of the study site, new railway lines are now showing terminating at Richmond. Within the study site itself, the same building can be seen to be present across its northern end. A new entrance off Kew Road, giving access to what appears to be an open yard area, is now seen within the southern end of the study site. A sloping bank is now also shown along the eastern side of Kew Road, crossing into the boundary of the study site.

6.6.12 The remaining entries of post-medieval date recorded in the GLHER from within the study area relate to a quarry pit or rubbish dump of a general post-medieval date (**Figure 3: 17**) and the Vineyard Passage Burial Ground, which was founded in 1790 as an extension to the parish churchyard of St Mary Magdalene (**Figure 3: 18**).

6.7 Modern

6.7.1 The Ordnance Survey Map from 1913 (**Figure 10**) shows further development across the surrounding area. A new public house is depicted to the north of the study site and a new building, presumably industrial in nature, can be seen to the west of the study site. The study site itself does not appear to have been altered in any major way at this time.

6.7.2 The next consulted cartographic source is the Ordnance Survey Map from 1933 (**Figure 11**). Few changes can be seen to have taken place across the surrounding area at this time. A small outbuilding is now shown within the northwest corner of the study site. No further alterations are known to have taken place at this time.

6.7.3 The Ordnance Survey Map from 1960 (**Figure 12**) shows that several changes have taken place across the surrounding area. The large building is no longer present within the northern end of the study site at this time. A new access road now bounds the study site to the north, leading to Richmond Station Car Park. To the south of the study site, the new combined Richmond Station is now present, bounding the study site to the southeast. The study site can be seen to remain as undeveloped land at this time.

6.7.4 The Ordnance Survey Map from 1972 (**Figure 13**) shows Westminster House now located across the study site. Apart from several shelters now present along Kew Road, no major changes can be seen to have taken place within the surrounding area at this time.

6.7.5 The final consulted cartographic source to show the study site is the Ordnance Survey Map from 2001 (**Figure 14**). This map shows the continued development of the surrounding area, including new buildings to the northeast and the east of the study site. The study site itself does not appear to have been changed in any major way at this time.

- 6.7.6 The only entry of modern date recorded in the GLHER from within the study area is the London Welsh Rugby Football Ground, a private rugby ground established within the Old Deer Park (**Figure 3: 21**).

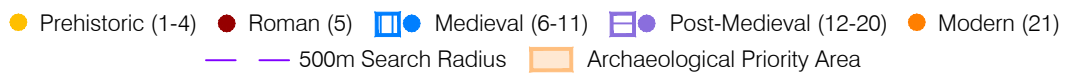
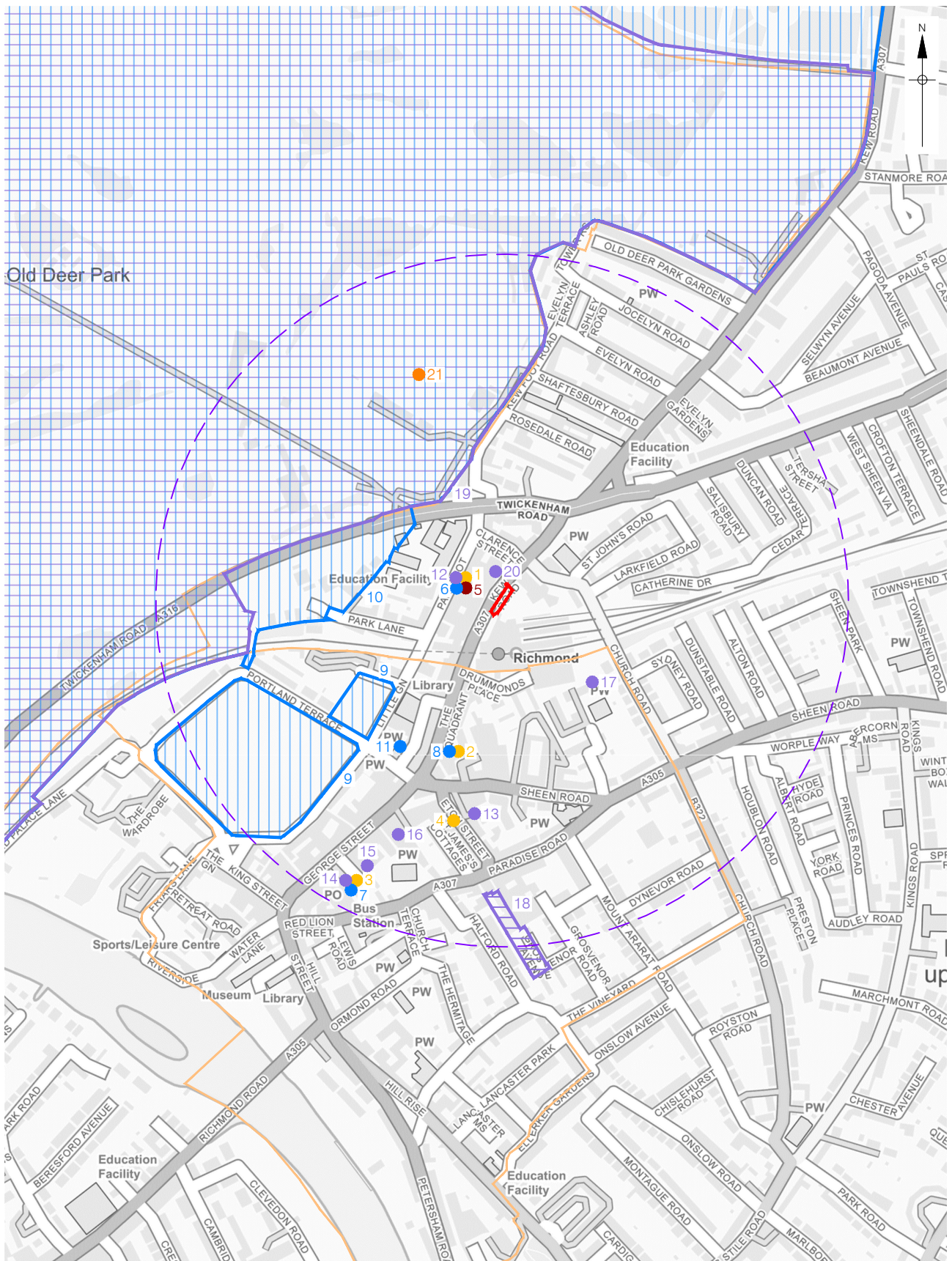
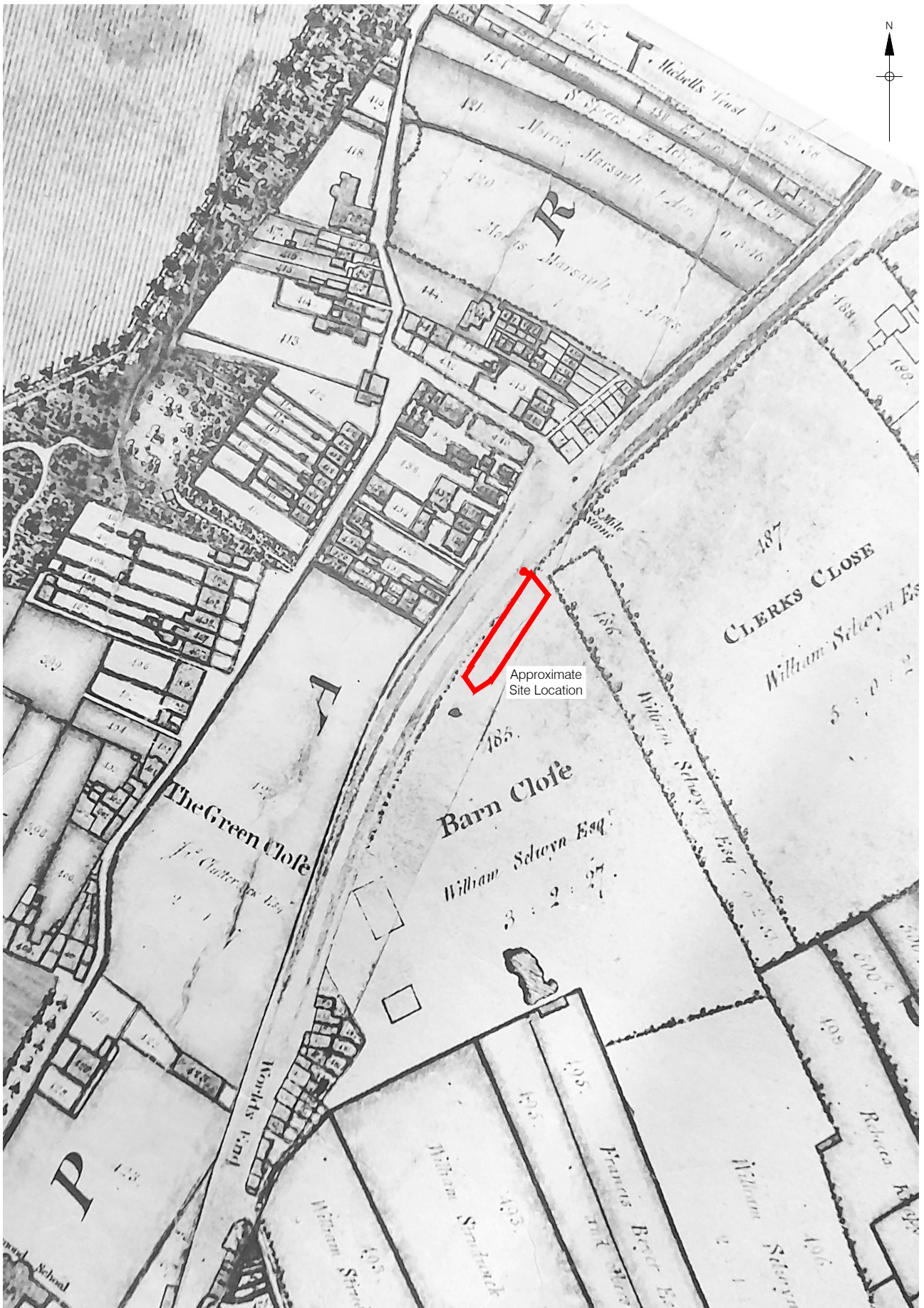


Figure 3
 GLHER Locations
 1:8,000 at A4



0 100m

Figure 4
Rocque's map, 1746
Approx. 1:2,000 at A4



0 100m

Figure 5
Plan of the Royal Manor of Richmond, 1771
Approx. 1:2,000 at A4