

# Archaeology Advice Note

## Hunters Lodge, Friars Lane, Richmond, London

### Introduction

1. This Archaeological Advice Note Assessment has been prepared by James Meek, MCIfA, Director of HCUK Group, on behalf of Richmond Green Developments Limited. It relates to the proposed redevelopment of a site known as Hunters Lodge, Friars Lane, Richmond
2. The site lies within the Tier 1 Archaeological Priority Area of Richmond Palace (reference Richmond APA 1.4). This is summarised as follows: *'The Richmond Palace APA covers the site and immediate environs of an early medieval manor house, and the site of a series of moated medieval palaces. Some Tudor buildings remain on site, while other elements and structural features of the Tudor palace were incorporated in to the 17th to 18th century houses and residences that remain on site.'*

*There is a history of positive archaeological interventions within the APA. It is classified as Tier 1 as it covers the site of an important Lancastrian and Tudor palace that played a significant role in the formation of the wider religious and royal landscape of Richmond.*

*Richmond Palace APA lies between Richmond Green and the River Thames; it is defined by the area occupied by the precinct of the Tudor palace. The southwestern boundary of the APA extends into the river and running along the opposite bank incorporating Corporate Island. The remaining boundary follows Old Palace Lane and The Green (facing on to Richmond Green) and runs back towards the River along Friars Lane.*

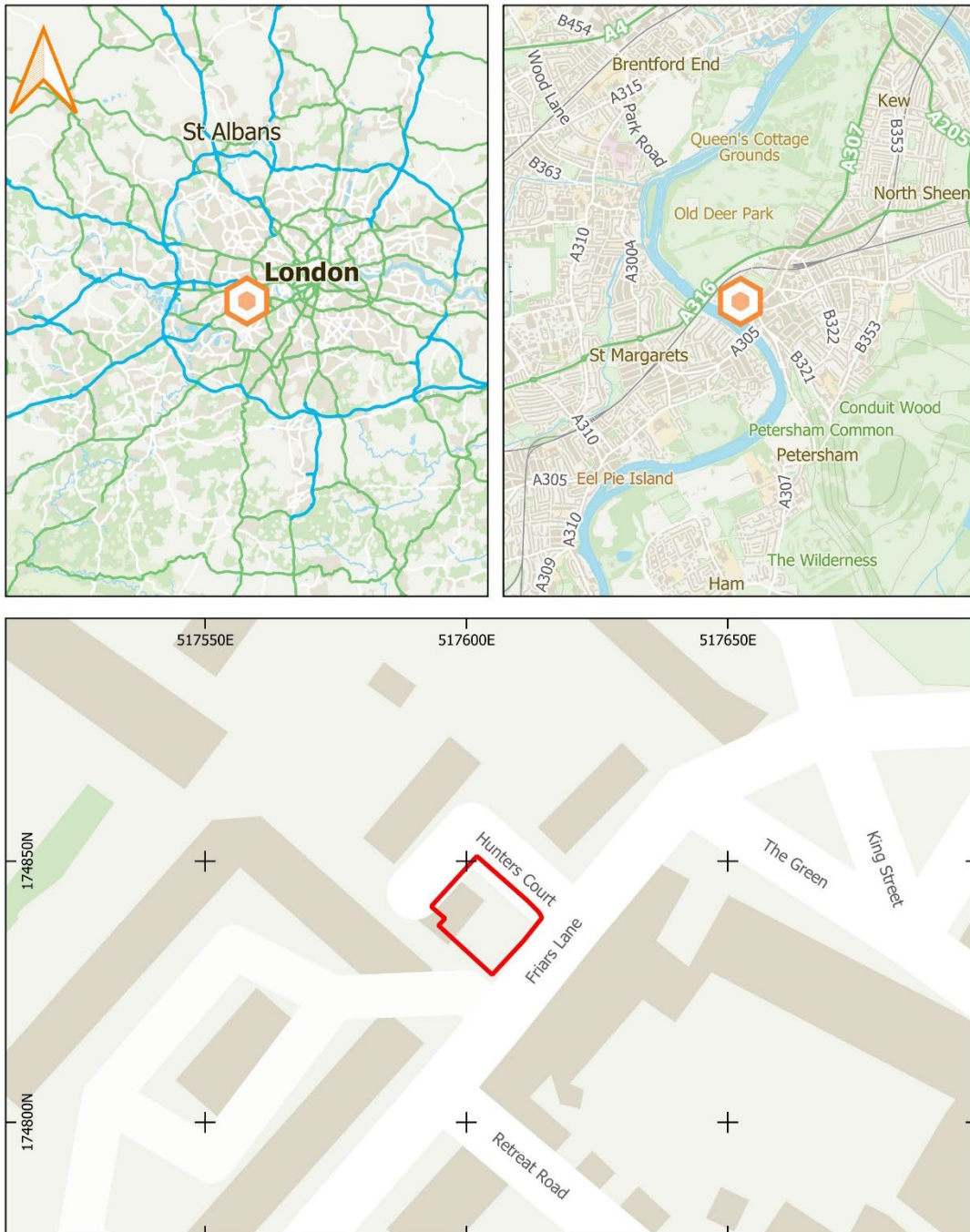


Figure 1: Site Location Plan

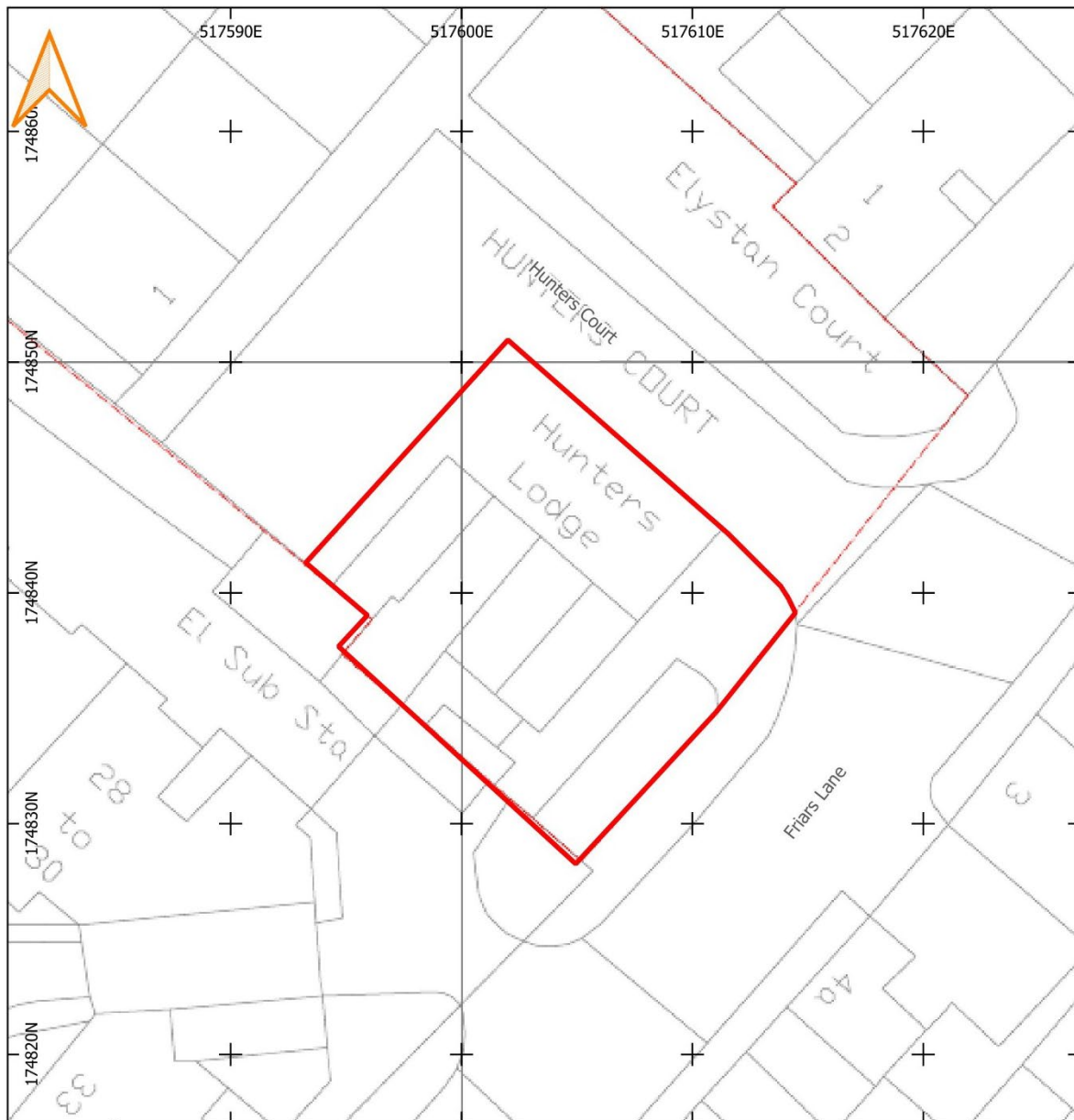


Figure 2: Detailed Site Location Plan

### Previous Archaeological Works

3. An archaeological desk-based assessment was previously prepared of the site by 'Heritage Information Ltd' in April 2022. The report was used in support of a planning application for redevelopment that included a new building with a basement area. The desk-based assessment was summarised as follows, with the most relevant sections highlighted in bold text: *'The subject site is known as*

*Hunters Lodge at Hunters Court, Friar's Lane, Richmond-upon-Thames, TW9 1NX. The site comprises an unlisted garage block with first-floor residential accommodation which was built in 1960 and originally associated with the terrace of four houses within Hunters Court. The site is located within the Richmond Palace Archaeological Priority Area (Tier 1), London Borough of Richmond-upon-Thames.*

*Based on the GLHER, cartographic and documentary evidence, a low potential has been identified for the Prehistoric, Roman and Anglo-Saxon periods given the paucity of finds and features within 500m of the site. ... A low potential for Medieval archaeology likely of regional or national significance has been identified based on the continuous use of the site throughout the period; there have been little or no discoveries within the palace site relating to the medieval Sheen Palace.*

***It is considered that there is a high potential for Post-Medieval archaeology of national significance. The subject site at Hunters Lodge appears to be located on the site occupied by the line of the palace galleries and the polygonal tower, which may have been incorporated within the 17th century tenements and large 18th century building demolished during the early 19th century. There may be potential for foundations, fabric and finds from across the Post-Medieval period which relate directly to the palace buildings.***

*A moderate potential for Modern archaeology has been identified. ...*

*Planning Permission is being sought for the demolition of the existing building and the provision of a **two-storey building in the same location on a slightly larger footprint with basement accommodation.***

***The excavation of the basement to a depth of 2.5m plus foundation slab is highly likely to have archaeological implications. The site has limited past impacts and has a high potential for Post-Medieval archaeology of national significance related to Richmond Palace. Even though the proposals are small-scale in development terms, the basement excavation in this location would likely have a substantial negative impact any archaeological remains dating from this highly significant period.***

***Following a pre-application consultation with GLAAS advisors Mark Stevenson and Joanna Taylor, who have reviewed this Archaeological Desk-Based Assessment, additional archaeological evaluation will be required prior to the determination of a full planning application ...***

*In terms of above ground archaeology, the existing building abuts the Grade II listed south-west boundary wall and does not appear to be tied into it. ... A recording exercise of this section of the boundary wall may also be required, although it is noteworthy that the existing wall in this location appears to date from the later 19th century with later repairs and additions.*

4. Following the preparation of the report an archaeological evaluation was undertaken of the Site by Museum of London Archaeology (MOLA) in May 2022.
5. The evaluation comprised five test pits (TP's). The archaeological evaluation was limited due to modern obstructions. In the end three of the test pits did not reveal significant remains (TP1, TP2 and TP5), but two of them did (TP3 and TP4).



Figure 3: Evaluation Test Pits (MOLA 2022)

6. The test pit located to the north-west of the existing building, adjacent to the existing garden wall encountered the footings of a Tudor wall on which the garden wall was built. The report noted that *'The characteristics of the footings and brick samples taken from deposits related to its demolition suggest that this was of Tudor period in date.'*
7. The other test pit containing archaeology was excavated within the south-eastern garage of the existing building. Here the remains of Tudor or Stuart masonry was revealed, which could relate to small 17<sup>th</sup> century tenements or cottages that formally fronted Friar's Lane, as identified through the Desk-Based Assessment

(Heritage Information, 2021). The Assessment also noted that these *'likely incorporated elements from the former palace galleries and polygonal tower'*.

8. The report concluded that *'Tudor and Tudor-Stuart archaeological remains may be impacted by the redevelopment of the existing building.'* These remains could include elements of the former Richmond Palace and its galleries. As such, these remains would be considered of national significance.
9. The desk-based assessment and evaluation report by MOLA were undertaken to support the original application that was to include the construction of a new building with basement. This application was for a four unit scheme with basement and was subsequently refused (22/1649/FUL).
10. The Greater London Archaeological Advisory Service of Historic England (GLAAS), recommended refusal of the scheme due to the basement proposals and laid out the following in their recommendation for refusal letter: *'The primary significance of the site lies in its importance as part of a Lancastrian and Tudor palace, and the close links to the nearby religious houses of Shene Charterhouse and Syon Abbey, all founded during a period of 'Great Works' by Henry V. The area is thus of national historic significance, given its potential to inform our understanding of this important monastic and royal landscape from the 14th to mid-17th century.'*

*Although the Palace remains are not scheduled, parts of the complex are listed and the whole lies within a conservation area. The Tudor palace has been identified by the GLAAS APA review as likely to be of national importance, and this is accepted by the applicant's archaeologist. GLAAS's review of Archaeological Priority Areas has established that they are of equivalent significance. NPPF 200 fn 68 stipulates that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments, should be treated as though they are designated by planning decision makers.*

*Archaeological evaluation was carried out on the site at pre-determination stage at the request of this office. The evaluation encountered structural Tudor remains relating to the galleries (built in 1503) of the Tudor palace. The remains were located within the current garage building at a depth of c 1m and 1.60m below ground level. These remains would be destroyed by construction of the basement*

*causing harm to the archaeological interest of a heritage asset of high archaeological significance.*

*We recommend that the council identifies Richmond Palace as a non-designated heritage asset, specifically, one of archaeological interest of equivalent significance to a scheduled monument and concludes that the construction of the proposed basement would cause serious albeit less than substantial (in NPPF terms) harm to that asset (see also Historic England Advice Note 7, reference paragraph 27).*

*We question whether there are public benefits which might outweigh the harm that would be caused, especially as any public benefit associated with new housing is capable in this case of being realised without basements. We therefore object to the current application and recommend that it is refused. .' (dated 5<sup>th</sup> August 2022)*

11. The letter went on to add '*However, a redesigned scheme without a basement and with appropriately sensitive foundations might be acceptable*'.

## The Revised Development Proposals

12. The revised development proposals are for demolition of the existing structure and construction of a new building containing four dwellings. The building will be of ground floor, first floor and loft level. The new plans do not have a basement level. The new designs have been put forward by 50 North Architects (an award-winning local architectural practice that has considerable experience of working in environmentally sensitive locations). The present proposals seek to overcome earlier objections.
13. A detailed heritage Impact Assessment, discussing the potential impacts to built heritage assets, including the adjacent Grade II listed Richmond Palace Wall, the Conservation Area and locally listed buildings (HCUK 2023). This report concluded that the development proposals would have no built heritage impacts that would provide reasons for refusing the new development application.
14. As noted in the letter from GLAAS, and subsequent correspondence with them, removal of the basement from the proposals may be acceptable, thereby



removing any significant impacts upon the archaeologically important remains of Richmond Palace.



Figure 4: New Development Proposals Showing landscape and parking design – dated February 2024

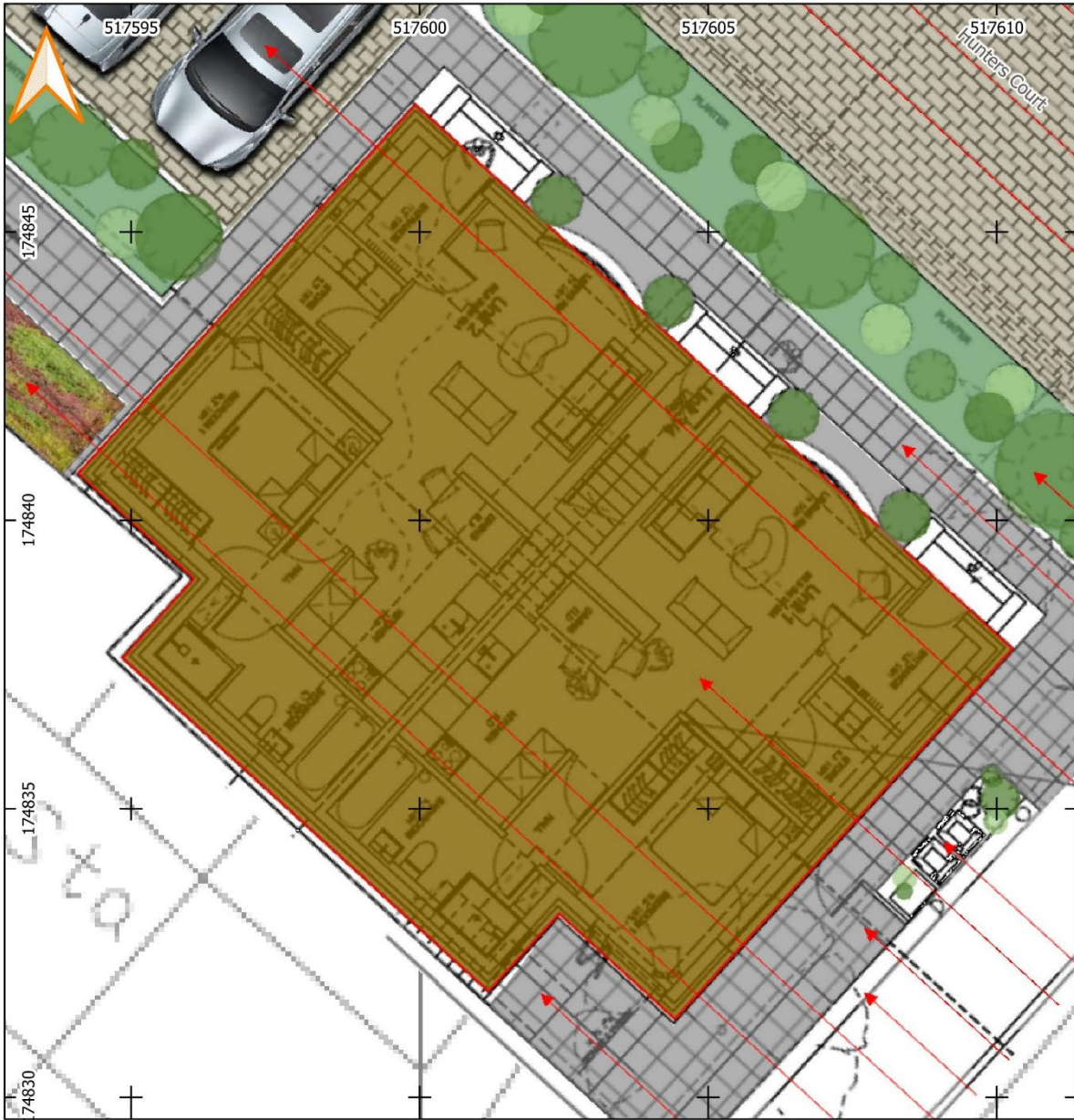


Figure 5: New Development Proposals showing detail of new build layout

## Foundation Design

15. GLAAS have stated that a redesigned scheme without a basement and with appropriately sensitive foundations may be acceptable in terms of the below ground impact to archaeological remains. The guiding principle is preservation in-situ of archaeology, so that it is protected beneath the redesigned building.
16. Foundation design should be prepared in consultation with GLAAS, to ensure that the proposals will be acceptable. Such foundation solutions could include the use of a raft foundation, albeit this would need to be confirmed if suitable by a structural engineer. It is possible that mini piles may be suitable, ensuring they are few in number and avoid any areas where archaeological remains have already been identified.
17. Any groundworks that would be undertaken for the foundations of the revised proposals, would need to ensure that the depths were less than the identified level of archaeological remains. Based on the results of the evaluation:
  - TP1, located in the northern part of the site area, encountered archaeological deposits (not significant) at a depth of 0.82m (6.86m aOD) below ground level (7.68m aOD).
  - TP2, located on the southeastern side of the area, encountered archaeological deposits (not significant) at 0.44m (7.31m aOD) below ground level (7.75m aOD).
  - TP3, located near the centre of the site, encountered archaeology 0.91m (6.78m aOD) below ground level (7.69m aOD).
  - TP4, located in the northwestern corner of the Site adjacent to the garden wall, encountered archaeological deposits 1.3m (6.16m aOD) below ground level (7.64m aOD).
  - TP5, located in the southern corner, encountered no archaeological deposits (not significant, only modern material) to a depth of 1.79m (6.05m aOD) below ground level (7.79m aOD).

## Conclusions

18. GLAAS have confirmed that the new development proposals should be submitted with the existing desk-based assessment prepared by Heritage Information Ltd, and the report on the trial trench evaluation (by MOLA), accompanied with proposals for a foundation design scheme that would ensure the archaeological remains were preserved in situ. GLAAS have stated that basement proposals will not be acceptable, and these have been removed from the new development proposals.
19. Any groundworks required for the proposed development will have to take into account the potential of encountering significant archaeological remains within the Site, as indicated in TP3 and TP4 of the evaluation, at a level of 6.78m aOD at its highest level (c.0.90m depth from present ground level). There is a potential remains could survive to a higher level.
20. It is recommended that to take this forward a foundation design using a raft foundation with a limited below ground depth is used to preserve archaeological remains below ground.
21. Any groundworks undertaken at the site, including removal of existing floor slab or overburden, should be undertaken with under an archaeological watching brief to ensure that no Tudor or Stuart archaeological remains are exposed, damaged or destroyed. If exposed they should be recorded and protected. Assuming the groundworks do not go below a level of 6.78m aOD (approximately 0.90m depth) then archaeology should not be exposed, but this is only based on the previously limited trenching undertaken. Ideally groundworks would be no lower than 7.00m aOD to avoid the risk of disturbance.
22. In the event that mini piles are agreed to be acceptable, then pile layout drawings will need to be considered in terms of the potential disturbance to known below ground archaeological remains. This will require additional consultation with GLAAS.