

The Royal Parks

TRP Roehampton Gate Café

Historic Environment Assessment

Final report

Prepared by LUC

July 2024



The Royal Parks

TRP Roehampton Gate Café Historic Environment Assessment

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Chapter 1

Introduction

Project background

1.1 LUC has been commissioned by The Royal Parks to prepare an historic environment assessment (HEA) to accompany an application for planning permission for the proposed redevelopment, on land at 138 Priory Lane, London SW15 5JR (hereafter 'the Site'). The Site is approximately 0.4ha in extent and centred on NGR TQ 21328 74089. The main components of the proposed development will comprise:

- the demolition of current buildings within the Site; and
- the construction of a new café, public toilet, cycle hire building and landscaping.

1.2 A summary of the potential key risks to heritage arising from the proposed development was prepared in February 2023 and is summarised in the Pre-application Heritage Appraisal included in **Appendix B**.

Aims and objectives

1.3 This historic environment assessment (HEA) aims to explain how heritage assets within and surrounding the Site may be affected by the proposed development. It seeks to:

- Identify the significance of heritage assets within the application Site and its environs.
- Assess the likely impact of the proposed development upon the historic environment.

1.4 The HEA includes consideration of both buried archaeological and above-ground heritage assets, and, therefore, fulfils the purpose of an archaeological desk-based assessment and a heritage statement.

Legislative and policy context

National context

1.5 National legislation relating to the protection and treatment of the historic environment within the development process identifies historic assets as a non-renewable, fragile and finite resource and places a priority on their conservation. The key pieces of legislation are the:

- Ancient Monuments and Archaeological Areas Act (1979); and

- The Planning (Listed Buildings and Conservation Areas) Act (1990).

1.6 The 1990 Act places a number of duties on decision makers, keys amongst these are:

- Section 16 states that, in considering applications for Listed Building Consent, “special regard” will be had “to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”; and
- Section 72 states that, in considering applications affecting Conservation Areas, “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.

1.7 In the operation of this law, the concept of ‘preservation’ referred to in Sections 16 and 72 has been interpreted as ‘to do no harm’.

1.8 The application of these laws is guided by national policy, set out in the National Planning Policy Framework (NPPF). Whilst there are references to the historic environment throughout the NPPF, Section 16 ‘Conserving and enhancing the historic environment’ deals with the topic in detail. The NPPF paragraphs relevant to this application are included in **Appendix A**.

Local policy

1.9 The London Borough of Richmond Upon Thames Local Plan was adopted in 2018 and it sets out policies and guidance for the development within the borough until 2033. Policies of relevance to the current application are given in **Appendix A**.

Chapter 2

Methodology

Introduction

2.1 The assessment has been carried out in accordance with the following appropriate guidance:

- Standard and Guidance for historic environment desk-based assessment (Chartered Institute for Archaeologists, 2017);
- Principles of Cultural Heritage Impact Assessment in the UK (IEMA, IHBC, CIFA 2021), hereafter referred to as PCHIA.
- Conservation principles, policies, and guidance for the sustainable management of the historic environment (Historic England 2008), hereafter referred to as Conservation Principles;
- The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Historic England, 2017); and
- Statements of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12 (Historic England, 2019).
- Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning Note 2 (Historic England, 2015).

Approach

2.2 The NPPF defines the historic environment as all aspects of the environment resulting from the interaction between people and places through time.¹ It is comprised of heritage assets which the NPPF defines as: “*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).*”² This assessment therefore focuses on if, and how, the proposed development will change the cultural significance of heritage assets within and around it. To do this the six steps set out in PCHIA are followed:

- **Understanding heritage assets:**

¹ NPPF 2023.

² NPPF 2023.

1. describe the asset;
 2. ascribe cultural significance; and
 3. attribute importance.
- **Evaluating the consequences of change:**
4. understand change;
 5. assess impact; and
 6. weigh the effect.

Understanding heritage assets

Description

2.3 A factual description of each selected asset is provided covering location, form, fabric, condition, etc. As proportionality is key, the information presented is focused on that which is relevant to understanding the significance of the asset, particularly those elements that might be affected by the development.

Ascribing significance

2.4 The value of heritage assets to present and future generations is measured by their heritage significance: the sum of their heritage values. In this assessment, significance is articulated in accordance with Historic England's (2008) guidance document Conservation Principles,³ which sets out four key heritage values:

- **Evidential value** – deriving from the potential of a place to yield evidence about past human activity.
- **Historical value** – deriving from the ways in which past people, events and aspects of life can be connected through a place to the present. This is typically either illustrative or associative.
- **Aesthetic value** – deriving from the ways in which people draw sensory and intellectual stimulation from a place. This includes architectural and artistic interest.
- **Communal value** – deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

Setting

2.5 In line with NPPF, the contribution that setting makes to an asset's significance has been considered. Setting is defined by the NPPF as the surroundings in which an asset is experienced. The contribution made by setting to an asset's heritage significance is set out discursively with reference to Historic England's (2017) setting guidance. This, and an understanding of the nature and likely interaction of the

proposed development with the contribution of setting to the asset's significance, will be used to determine sensitivity to setting change. All heritage assets within the Site will be assumed to be of high sensitivity to physical change, unless otherwise stated.

Importance

2.6 Heritage values help in understanding cultural significance of an asset, but do not determine the level of that significance (i.e. 'importance'). For that, professional judgment has been employed alongside use of the designation criteria for assets of national significance and archaeological research framework.⁴ Assets may derive their significance from one or more of the heritage values outlined above, but a lack of interest in one or more of these areas does not indicate a lower level of importance, just that their interest lies elsewhere.

Evaluating the consequences of change

2.7 As per the PCHIA guidelines, the evaluation of change comprises three steps:

- The provision of a brief factual statement explaining the change wrought by the proposed development to a heritage asset.
- An assessment of whether that change affects the heritage assets significance and if so, how.
- A conclusion regarding whether an impact matters, reflecting the importance of the affected cultural heritage asset.

2.8 Effects are described in terms of the extent to which the proposed development will degrade or enhance the assets' significance using professional judgement.

2.9 Assessments are policy neutral and make no assumptions regarding the application of local or national policy, as it is for the decision-maker to understand the likely level of harm to heritage assets and balance this accordingly. Policy compliance and planning balance is covered in the Planning Statement for the proposed development.

Data gathering and study area

2.10 The Pre-Application Heritage Appraisal conducted in February 2023 aimed to inform The Royal Parks of potential heritage constraints and options arising from the proposed development. It led to identification of a moderate level of risk concerning the following assets:

- Richmond Park RPG (grade I listed; NHLE ref: 209715)

⁴ <https://researchframeworks.org/rfla/> (accessed 27/03/2024).

- Richmond Park Conservation Area;
- Archaeological remains potentially preserved within the Site;
- Landscaping to Alton West Estate Registered Park and Garden (Grade II listed; NHLE ref: 1466474); and
- Alton Conservation Area.

Sources

2.11 The following sources of information were used in the preparation of this report:

- The National Heritage List for England (NHLE).
- Local authority conservation area information.
- Historic Environment Record (GLHER - 18412) data.
- Locally listed assets.⁵
- Ordnance Survey (OS) historic mapping.
- Aerial imagery and LiDAR data.
- Walkover survey.
- British Geological Survey (BGS) mapping.
- Secondary published and online sources.
- AOC (2018). The Royal Parks Archaeological Management Strategy.⁶
- London Borough of Richmond Archaeological Priority Area Appraisal.⁷
- Ground investigation results (GI).
- Proposed development plans and sections and design report.

Study Area

2.12 A study area of 1km buffer (hereafter 'outer study area') calculated from the Site boundary has been created to inform the historical and archaeological background and to formulate the archaeological potential of the Site.

2.13 Based on the Roehampton Gate Café Pre-Application Heritage Appraisal results (**Appendix B**), heritage assets potentially affected by the proposed development have been selected within a 500m study area (hereafter 'inner study area').

Consultation summary

2.14 Greater London Archaeology Advisor Service (GLAAS), through Joanna Taylor, was consulted, and a copy of the present document was submitted for her review.

2.15 The archaeological advisor said that the report demonstrates that the site was developed during the latter half of the 20th century; however, the survival of archaeological deposits and horizons beneath and within the boundary of the Site is unknown. Given the nature of the envisaged archaeological deposits, Joanna Taylor intends to recommend that a two-stage archaeological condition be attached to the planning permission if granted.

Walkover survey

2.16 A site visit, comprising a walkover survey of the Site and an inspection of heritage assets, took place on 5 April 2024. The weather was variable, providing good visibility. The survey allowed for the exploration and assessment of the significance of heritage assets within the inner study area. As a result, heritage assets predicted to undergo changes in their significance due to the proposed development have been chosen for further assessment. The remainder have been removed from the scope of detailed assessment (refer to **Chapter 3** and **Appendix D for further detail on selection**). Selected photographs from the site visits are included in the report.

Assumptions and limitations

2.17 Much of the information used by this study consists of secondary information compiled from a variety of sources. The assumption is made that this information is reasonably accurate unless otherwise stated.

2.18 There is an inherent uncertainty when assessing effects to buried archaeological remains as it is difficult to ascertain their presence, extent, and significance without physical investigations.

⁵ [Aurora \(wandsworth.gov.uk\)](https://www.wandsworth.gov.uk) (accessed 04/04/2024).

⁶ <https://www.royalparks.org.uk/media/2566/download?attachment> (accessed 04/04/2024).

⁷ <https://historicengland.org.uk/content/docs/planning/apa-richmond-upon-thames-2022-pdf/#:~:text=The%20appraisal%20is%20an%20opportunity,adoption%20in%20the%20Local%20Plan> (accessed 04/04/2024).

Chapter 3

Historic environment baseline

Site conditions

Location and description

3.1 The Site is located within Roehampton Gate car park, to the north-east of Richmond Park. The Site is bounded by Priory Lane to the west, The Alton Primary School to the north and north-east and Richmond golf course to the south (**Figure 1**).

3.2 The Site is currently occupied by several buildings and structures including an existing café for park visitors, with a decked seating area, temporary public toilets, a cycle hire building, other cycling infrastructure and car parking. The open area includes tarmac surfaces and gravel surfaces.

3.3 The north-east boundary of the Site overlaps with the park boundary, which is double-fenced, creating a roughly 5m wide landscape buffer zone between the site and Alton Primary School, situated immediately beyond.

3.4 There are several large, mature trees situated within landscape areas that break up the car park, as well as in locations immediately to the north and south of the car park.

3.5 To the west of the Site, there is a belt of trees that screens most of the Site from the rest of the park. Additionally, a combination of tree lines and shrubs, particularly to the south-east, further screens the Site from surrounding views.

Topography and geology

3.6 The Site is relatively flat, with the highest elevation reaching approximately 10m above Ordnance Datum (AOD). The nearest river, Beverley Brook, flows at a lower level parallel to the Site, approximately 160m to the west.

3.7 The Site is located in the 'Beverley Plain' landscape character area and lies at base of two areas of higher ground: Sidmouth Wood and Dark Hill/ Broomfield Hill in Richmond Park. These two areas are intersected by the Pen Ponds that draw water from the streams that flow from higher ground and drain into the Beverley Brook to the east.

Figure 3.1 View of the Site through the tree belt gap



Picture taken from the west of the Site, looking east

3.8 The BGS website⁸ records the bedrock within the Site as London Clay Formation, clay and silt deposit of marine sedimentary origin formed between 56 and 47.8 million years ago, and overlaid by Head superficial deposits, sedimentary layers of clay, silt, sand and gravel formed between 2.588 million years ago and the present.

Geotechnical survey summary

3.9 Ground investigations (hereafter 'GI') undertaken by GEA in March 2024 consisted of the excavation and drilling of five test pits (which information has not been provided) and six boreholes (**Figure 6**).

3.10 The GI recorded consistent made ground deposits overlaying Head deposits. In turn, these were recorded overlaying Kempton Park Gravel found covering London Clay.

3.11 Made ground deposits were recorded at the depth comprised from 0.00m and 0.70m. These are likely modern considering the depth and the type of inclusions found within them (clinker and ash, concrete, brick fragments). These deposits overlaid a sequence of geological layers. They are summarised below following, from the top to the bottom, their deposition sequence (full log details in **Appendix C**):

- Light brown silty gravelly clay – 0.30m –1.60m below ground level (bgl);
- Light brown gravelly (at times clayey) silty sand – 0.30m –1.60m bgl;

- Light to medium brown gravelly/silty sand – 1.50m –3m bgl;

3.12 Within borehole 5, a sequence of clay deposits was found instead of layers of sand. The clay found at 2.2m depth was interpreted by the GI as London Clay.

3.13 Pockets of silt were also noted through the sequence.

3.14 These deposits have been interpreted as possible Head/alluvial-colluvial deposits.

3.15 Further boreholes are recorded to the south-east of the Site at the approximate distance of 350m and 400m. The borehole GARNETT COLLEGE BH1-5⁹ shows a detailed sequence which included: a stiff blue clay layer reached at the approximate level of 8m BGL (possibly London Clay bedrock) and overlaid, from the bottom to the top, by three deposits of brown clay (likely Head deposits) and made ground. The made ground is approximately 1.5 m thick and includes clay and brick fragments.

3.16 To summarise, superficial ground disturbance has been detected within the Site, especially within the southern part. Underneath the made ground, a sequence of possible terrace deposits (Kempton Gravel), and colluvial/alluvial deposits (head deposits formed by solifluction process) have been recorded overlaying the bedrock (London Clay). These represent a process of accumulation of deposits started 2.5 million of years ago and still active.

3.17 Due to the position and the geology, the archaeological remains, if present within the Site, might be cutting/overlaying or covered by the geological deposits described. Especially early prehistoric remains might be found at a great depth.

Previous archaeological works

3.18 No archaeological investigations have been carried out within or in the immediate vicinity of the Site.

3.19 In 1983, a historic area assessment was undertaken for the whole of Richmond Park to assess the condition of the asset (GLHER ref: 162386). Furthermore, a desk-based assessment was carried out by Archaeological Services and Consultancy in 2007 covering the whole Roehampton Park golf course, including the southern part of the Site (GLHER ref: 153310). The conclusions of the assessments are not available.

3.20 A watching brief was conducted at c.1km to the south-west of the Site, within the White Lodge area and no archaeological features were observed (GLHER ref: 164150).

⁸ <https://geologyviewer.bgs.ac.uk/> (accessed 27/03/2024).

⁹ http://scans.bgs.ac.uk/sobi_scans/boreholes/589334/images/21095984.html (accessed 27/03/2024).

3.21 A survey was conducted in 1991 c.1km to the west of the Site, within Richmond Park and medieval evidence related to fields and roads were recorded (GLHER ref: 155086).

3.22 Several archaeological investigations, including watching briefs, archaeological evaluations and excavations, were conducted to the north-east of the Site, outside of Richmond Park within the 1km study area. Collectively some prehistoric find and features, early medieval features and post-medieval features and structures were unearthed, most of them were located to the north-east of the Site at c. 350m distance, around Clarence Lane and Queen's Mary Hospital. They are described in the historical and archaeological background section below.

Historical background

Prehistory

3.23 The Site is part of Richmond Park APA¹⁰, in which traces of human occupation are attested since the Palaeolithic period. The park also includes two possible barrows (NHLE ref: 1457267; 1457269) located outside of the outer study area, at c.3km to the south-west of the Site.

3.24 The topography, natural resources, and presence of watercourses made Richmond Park a favoured location for early human occupation. The gravel and sand deposits underlying the majority of the park make it an advantageous area for farming. However, patches of clay create boggy zones in certain areas.

3.25 Despite these favourable characteristics, only a few archaeological finds and remains are recorded within the outer study area (this can be related to the limited number of archaeological investigations). A Palaeolithic hand axe (GLHER ref: 131026) was recovered at the distance of c.100m to the south-east of the Site.

3.26 Palaeolithic hand axes and flints, and some undated flint flakes (GLHER ref: 147062, 104901, 118134) were collected at c.600m to the east of the Site. A possible Neolithic axe head (GLHER ref: 116079) was found within the Roehampton Golf Course, at c. 400m to the north of the Site, although the exact location is uncertain.

3.27 Late prehistoric remains are better represented; they were unearthed during archaeological investigations.

3.28 An early Iron Age tree throw pit and a posthole were recorded during excavations at Queen Mary's Hospital (GLHER ref: 105038).

3.29 A few prehistoric features have been recorded during archaeological investigations undertaken at the Froebel Educational Institute site (to the north-east of the Site and at the approximate distance of 400m). They consisted of a Late Bronze Age pit (GLHER ref: 134665), postholes (GLHER ref: 127409) and a ditch (GLHER ref: 128125).

Roman

3.30 Within the outer study area, no heritage assets are attributable to the Roman period.

3.31 Although the Site lies not too far from the Roman road which linked *Londinium* to Silchester, *Calleava*, (c.5km to the north-west of the Site) and along the Thames other Roman settlements are attested (Putney is the closest), the evidence of Roman activity in the Richmond Park area are very limited, with the focus of Romano-British archaeology to the south of the park at Coomb, as well as north and west adjacent to the River Thames.

Early-medieval and medieval

3.32 No archaeological remains dating to the early medieval period have been recorded so far within the Site.

3.33 An early medieval linear ditch and postholes (GLHER ref: 115123) were unearthed during the archaeological excavation carried out at Queen Mary's Hospital, located c. 850m to the east of the Site. Although limited, these remains testify to permanent human occupation relatively close by in the early-medieval period.

3.34 During the medieval period, the Richmond Park area likely part of the Sheen possession and belonged to the manor of Kingston. In the 14th century, King Edward III began converting the manor house of Sheen into a royal palace. It was during the reign of Henry VII, at the end of the medieval period, that an extensive programme of construction and alteration was undertaken. In this period, due to its resemblance to another royal property, Richmond in North Yorkshire, the manor of Sheen was renamed Richmond. It is probable that activities such as hunting were carried out by the royal household in the park during this period.

3.35 The area surrounding the Site was likely visited not only by sovereigns. The wider environment of Richmond Park was primarily agricultural, consisting of open fields, common arable land, sparse settlements, and nucleated villages located in the vicinity of the River Thames. Specifically, Palewell Common (GLHER ref: 143840), located c.250m to the north-east of the Site is recorded as remnant of the medieval common lands existing before Richmond Park was enclosed. Moreover, the

¹⁰ <https://historicengland.org.uk/content/docs/planning/apa-richmond-upon-thames-2022->

[pdf/#:~:text=The%20appraisal%20is%20an%20opportunity,adoption%20in%20the%20Local%20Plan">pdf/#:~:text=The%20appraisal%20is%20an%20opportunity,adoption%20in%20the%20Local%20Plan](#) (accessed 04/04/2024).

medieval village of Roehampton is located to the north-east of the Site at c. 400m.

3.36 The agricultural activities undertaken within the Site are also attested by the presence of areas of ridge and furrow earthworks (GLHER ref: 132424). They were recorded at c. 600m to the south-west of the Site, as undated, but likely of medieval or post-medieval periods.

3.37 Despite the relative paucity of below ground archaeological records, it is likely that the park and the area surrounding the Site were exploited and temporarily occupied during the medieval period. The park's environs likely comprised a combination of woodland, open pasture, and crop areas. For instance, traces of extractive and agricultural activities, as well as evidence of woodland and land management, might be preserved within the Site.

Post-medieval¹¹

3.38 Henry VIII and Elizabeth extensively utilized the Royal Palace of Sheen, Richmond, likely using the park area for hunting and refuge from plague outbreaks in London. Subsequent monarchs continued to use and modified Richmond palace and possibly used the woodland area for recreational purposes. It is likely that the local community continued to exploit the park for its natural resources.

3.39 The area became a park with Charles I (1625-1649), who enclosed with brick walls 2000 acres of woodland. The new park followed the model of a medieval deer park for hunting and as a recreational place for the royal household.

3.40 The use of the area by the local community continued with a royal permission granted in this period. This includes, for the local inhabitants, access to the park via ladder stiles, to mitigate their disappointment at the enclosure.

3.41 Major improvement occurred in the 18th century, when George II gave the management of the park to a ranger, Lord Orford, who undertook a series of developments. Under his management, boggy areas were drained, overgrown vegetation was cleared and a shooting box called Stone Lodge, which later became White Lodge (Grade I; NHLE ref: 1250045), was built and located c. 1km to the south-west of the Site.

3.42 Due to constant intruders, Lord Orford denied access to the park, removing the ladders and constructing lodges along

the main entrances. This is corroborated by the 1746 John Rocque map¹², where the Site contains a small building, interpreted as the lodge and located to near Roehampton Gate (labelled as Roehampton Gate), is depicted. The map illustrates other elements of the Site's landscape. Near the lodge, two possible ponds and the Beverley Brook are illustrated. From the gate, a path splits in to two with north-west and south-west directions of the bifurcated path.

3.43 The Site, illustrated in the 18th century map as characterised by a green with isolated trees and a solid boundary, which borders the east of the Site (Park enclosure). Outside of Richmond Park, Sheen (north) and Roehampton (east) villages are illustrated with agricultural fields in between them.

3.44 Through the 18th and 19th centuries, the park passed from rangers to royal management and back several times.

3.45 By the mid-19th century, new plantations were made, and the park was enlarged, and a drainage system was constructed. These improvements changed the appearance of the park, from open hunting to a planned landscape park. The Old Lodge (located to the south of the White Lodge and originally built as ranger residence) was demolished; whereas the other lodges (Bog Lodge NHLE ref: 1250205 and the White Lodge, NHLE ref: 1250045) acquired a better status. By the 1851, the park became fully accessible to the public, with the admission of carriages and people without prior permission.

3.46 The 1851 Tithe map¹³ represents the Site as occupied by pastureland and well-spaced trees. The current road which bounds the Site to the west is illustrated on the Tithe map. Furthermore, a Beverley Brook channel appears to be constructed and crossing the north of the Site with a south-west/north-east direction, likely the consequence of a larger drainage system implemented in the Victorian period. The channel is now culverted, and it is visible as cropmark/earthwork.

3.47 To the north of this channel and along the park edge, three buildings related to Roehampton Gate are located. They are surrounded by a garden that is illustrated as enclosed. The southern part of it might be contained within the Site.

3.48 The Site is depicted with no further change in the first edition of the OS map¹⁴ (**Figure 4**), except for the tree coverage which appears more intense along the park

¹¹ For this section, Paul Rabbitts' book has been consulted: Rabbitts, P. (2014). *Richmond Park: From Medieval Pasture to Royal Park*, Stroud.

¹² <https://www.layersoflondon.org/map/overlays/rocque-10-mile-1746> (accessed 04/04/2024).

¹³ Plan of the part of Richmond Park situated in the Parishes of Putney and Mortlake in the County of Surrey, Original data: "IR29 Tithe Commission and successors: Tithe Apportionments" The National

Archives" accessed through <https://www.thegenealogist.co.uk/> (accessed 27/03/2024).

¹⁴ 1865 OS historical map, Six-inch England and Wales, OS map revised: 1912 to 1913 and published 1920, London Sheet N [View map: Ordnance Survey, Surrey VII \(includes: Wandsworth Borough; Wimbledon St Mary.\) - Ordnance Survey Six-inch England and Wales, 1842-1952 \(nls.uk\)](#) (accessed 04/04/2024).

boundary. The garden and the Roehampton Gate buildings are also illustrated with no further change.

Modern period

3.49 During the First World War, an army camp was set up within the park and large areas were ploughed. In the inter-war years, the deer herds were restored, and the park reverted to a place of recreation. Regarding the Roehampton Gate area, changes are illustrated in the 1912 OS map, where the three buildings are no longer located to the south of the roadway. Instead, two buildings are now located to the north of the road.¹⁵ Roehampton Gate Lodge dates to 1900, as confirmed by an inscription in the brickwork on the building's main elevation.

3.50 By 1930, golf courses and sports fields were laid out within the park. Specifically, a golf course was built by the architects by F. Hawtree and J.H. Taylor to the east of Beverley Brook and to the south of the Site. This course was opened 9 June 1923 by the Prince of Wales. A few years later, a second golf course was constructed adjacent to the first. The 1938 OS map¹⁶ (**Figure 5**) shows a pavilion located to the south of the Site, and a smaller building to the west of it (in the location of the current toilet) and a bifurcated road linking the buildings to the existing path which bounds the Site to the west. The golf boundary is located to the south of the Site, crossing it with a north-north-east/south-south-west orientation.

Figure 3.2 Golf Club Pavilion



Image extracted from Roehampton Restored Capital Project report provided by The Royal Parks.

3.51 During the Second World War, the park was re-occupied and partly ploughed. An anti-aircraft battery, recorded in 1940, is located c. 800m to the north-west of the Site (GLHER ref:

144664) attesting military activities carried out near the Site during the World Wars.

3.52 In 1985, Martin Hawtree, the grandson of the original architect, was commissioned to undertake a programme of modernisation of the two courses. The car park was likely constructed in 1993.

3.53 In the early 2000s, the Site shows a car park, a pedestrian path, public toilets, and the café. In 2002 a Golf Pro shop is illustrated on aerial photos (see below **Figure 3.3**) alongside with the pavilion which will burn down in 2003.

3.54 In 2014, the club house moved from Roehampton Gate to the south-east corner of the course. Between 2008 and 2013 the two the Golf Pro shop building was demolished, and part of the golf course landscaped.

Figure 3.3 Golf Pro shop



Image extracted from Roehampton Restored Capital Project report provided by The Royal Parks.

¹⁵ Six-inch England and Wales, OS map revised: 1912 to 1913 and published 1920, London Sheet N <https://maps.nls.uk/view/102345879> (accessed 28/03/2024).

¹⁶ 1938 OS historical map, Six-inch England and Wales, revised: 1938 and published 1944, Surrey Sheet VII.NW [View map: Ordnance](#)

[Survey, Surrey VII.NW \(includes: Ham; Mortlake; Wandsworth Borough.\) - Ordnance Survey Six-inch England and Wales, 1842-1952 \(nls.uk\)](#) (accessed 04/04/2024).

3.55 Overall, from the mid-20th century to the present, the Site underwent modifications related to the construction of the car park, café and storage buildings and landscaping.

3.56 At the present, the park is managed by The Royal Parks Agency and supports 350 fallow and 300 red deer.

LiDAR imagery and previous ground impacts

3.57 LiDAR imagery was used to detect possible archaeological features within the Site and in its surroundings, as well as investigate evidence for significant ground disturbance. The LiDAR shows several anomalies within the Site all attributable to modern landscape and infrastructure features and standing buildings. On the eastern side of Richmond Park, on the slope the area immediately to the west and south-west of the Site, arable features of different orientations, modern and less recent foot paths are visible on the LiDAR imagery. Here, at the approximated distance of 530m from the Site, ancient field boundary and possible ridge and furrow earthworks/golf course landscaping are also detected.

Figure 3.4 LiDAR 3d model of the Site

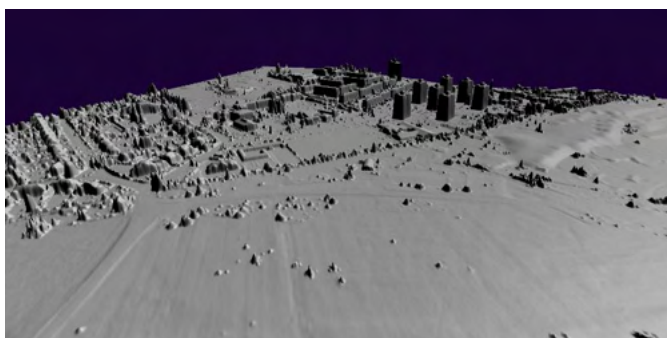


Image created from <https://houseprices.io/lidar> (accessed 06/04/2024)

3.58 Cropmarks linear features are visible from 2010, 2013 aerial photographs¹⁷, some of which might feature archaeological remains. These do not appear to be related to any evident modern changes except for the water drainage crossing the north of the Site. Aerial Archaeological Map Explores does not record any features within the surroundings of the Site.¹⁸

3.59 Services, sewer and water drainage are known to be present within the Site.

3.60 The hard and soft landscaping and the construction of buildings (although the current standing buildings have no foundations) and the GI might have affected the integrity of potential archaeological remains preserved within the Site.

The degree of such disturbance is not known with certainty. However, GI undertaken in 2024 within the Site shows a relatively undisturbed stratigraphic sequence. Made ground deposits likely being of modern date appear to be present to the south of the Site within BHs 3, 4, 5, they were encountered to the maximum depth of 0.70m (**Figure 6** and **Appendix C**).

Heritage assets within the study areas

3.61 The Site lies within Richmond Park Registered Park and Garden (grade I listed; NHLE ref: 209715), Richmond Park Conservation Area and within Richmond Park Archaeological Priority Area 1:6 -Tier 1 (APA).

3.62 Within the outer study area, three registered parks and gardens, 31 listed buildings, 15 conservation areas are located.

3.63 Most of the heritage assets are associated with post-medieval country houses and their landscaped parks and gardens. These buildings were typically constructed near the royal deer park of Richmond, chosen for the rural landscape's character and the prestige and status associated with the location.

3.64 GLHER reports 40 entries including finds, and archaeological remain records spanning prehistoric to modern periods. A further non-designated heritage asset has been identified in the Roehampton Lodge, a Richmond Park lodge building located at c. 80m to the north of the Site.

Assessment of significance

Designated heritage assets

3.65 Within the inner study area (500m buffer from the Site boundary), two conservation areas, nine listed buildings and two registered park and gardens are located (listed alongside with non-designated heritage assets in **Appendix D**).

3.66 A comprehensive list of designated heritage assets and locally listed assets within a 500m study area buffer, measured from the boundary of the Site, was included in the pre-application appraisal (See **Appendix B**). A traffic light approach was used to assess the feasibility risk level associated with the heritage assets.

3.67 Following a site visit, undertaken on the 5th of April 2024, the above mentioned list of assets was further refined and with the result of only two designated heritage considered as potentially affected by the proposed development:

¹⁷ Google Earth Pro (06/04/2024).

¹⁸ <https://molarchaeology.maps.arcgis.com/apps/MapSeries/index.html?appid=9a85640effc042ae91af6b0d43abbafb> (accessed 28/03/2024).

- Richmond Park Registered Park and Garden (grade I listed; NHLE ref: 209715);
- Richmond Park Conservation Area;

Non-designated heritage assets

3.68 There are no known non-designated heritage assets within the Site. However, the Site is included in the Richmond Park APA (1.6 Tier 1) which Tier 1 defines areas of known or strongly suspected heritage assets of national importance.

3.69 Thus, within the Site hitherto unknown archaeological assets might be preserved and physically affected by the proposed development. The potential is discussed below in the Archaeological potential section.

3.70 In addition, during the site visit, Roehampton Lodge has been identified as non-designated heritage asset potentially affected by the proposed development and consequently discussed below.

3.71 A full heritage assets scoping table, and selected site visit review have been included in **Appendix D**.

Richmond Park Conservation Area

Asset description

3.72 The conservation area covers the whole extent of Richmond Park. The park features a distinct natural open space enclosed by walls constructed for the will of Charles I, in 1637. The significance of the conservation area as whole lies in the natural character of the informal layout of woodlands and open areas enriched by the topographic gentle undulations and the watercourses. This combination provides a natural appearance of the asset's landscape.¹⁹

3.73 The Site is located within the north-east part of the conservation area. This part of the asset is contained within the inner study area and does not comprise listed buildings or locally listed assets.

3.74 The character and appearance of the north-east part of the conservation area is illustrated by the terrain, Beverley Brook, boundary wall screened by woods, meadows crossed by several paths and woodland patches. These elements make the north-east of the conservation area a secluded area which partly isolates the park from the urban developments surrounding it. Topography and woodland have a screening function between nearby designated buildings and the park, giving them only partial views into it rather than an appreciation of its entirety.

Significance

3.75 The 17th century rural character and appearance of the conservation area is appreciable and understandable from within the asset, where landscape and rural elements and their visual relationships contribute to create the remarkable historic landscape. The view from the Site towards the park is dominated by its parkland character, where woods screen landmarks such as the White Lodge are positioned at a higher elevation alongside meadows, creating an undulated skyline. These elements determine the character and appearance of this part of the conservation area, and demonstrate its historic illustrative and aesthetic values as a well-preserved early post-medieval deer park with landscaped elements.

Contribution of the Site to the asset's significance

3.76 The existing café, car park and facilities within the Site are not of heritage value and do not contribute to the significance of the asset. The special character and appearance of the conservation area can be appreciated in the view outwards from the Site, but not within it.

3.77 The current buildings and landscape elements of the Site are partly screened by a belt of trees located to the west of the Site and a combination of tree lines and shrubs located to the south of the Site. Moreover, mature trees situated within the Site, break up the car park, helping to mask its modern appearance. The Site in its present form, therefore, neither contributes to nor detracts from the character and appearance of the conservation area.

Figure 3.5 Richmond Park Conservation Area



Main road view looking south-west from Roehampton Gate

¹⁹ Richmond Park Conservation Area Statement chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.richmond.gov.uk/media/13291/conarea62_a3_rgb.pdf (accessed 04/04/2024).

Figure 3.6 Richmond Park Conservation Area



View of the CA appearance from Roehampton Gate Café' area

Figure 3.8 Boundary site road



Figure 3.7 Beverley Brook



Figure 3.9 Boundary wall to the north of Roehampton Gate



Figure 3.10 Roehampton Gate and Lodge



of the park and attested since at least the mid-19th century;

- The park boundary wall to the north of the Site;
- The Beverley Brook;
- Plantations and copse to the west (Sheen Cross Wood) and the south-west of the Site (Bone Copse, Queen Mother's Copse and Duchess Wood), paths and greens.

Significance

3.79 The elements of various date described contribute to defining the historical, aesthetic, and communal values of the registered park and garden. The historical illustrative value of the park is as an exemplar of a well-preserved royal deer and landscape park, retaining its original boundary and the enclosed combination of meadows and woodlands. The park's historical association with royalty, dating back to the Tudor period, and its enclosure evoke a sense of connection to the history of the royal family, instilling a feeling of belonging among visitors. Additionally, the park has been frequented by local communities and visitors since its enclosure (and possibly earlier), further reinforcing its status as a place of public access. Finally, this part of the park retains an aesthetic value as landscape design to provide tranquillity and visual pleasure, isolating the visitors from the urban hustle.

Contribution of the Site to the asset's significance

3.80 The Site is within an area of the registered park and garden where the enclosure wall no longer stands. Furthermore, a nearby part of the park (south-east) has been converted into a golf course, making it less directly perceivable as part of the historic landscape. The significance of the park can, therefore, be broadly understood and appreciated from within the Site, but in a slightly eroded way. The modern character of the buildings and landscaping within the Site do not contribute to the significance of the registered park and garden.

Figure 3.11 Copse and woods near the Site



Richmond Park Registered Park and Garden (grade I listed; NHLE ref: 209715)

Description

3.78 The asset consists of a royal deer park with likely late medieval origins, imparked by King Charles I and improved by subsequent monarchs. The key elements of the north-east part of the asset and within the inner study area are:

- The enclosed garden located between Roehampton Lodge and the Site;
- The road to the west of the Site which soon after the gate branches in two, carrying on to the south and west

Roehampton Lodge

Description

3.81 Roehampton Lodge was constructed in 1900 to replace the previous lodge located to the south of the road (**Figure 4**). The building is two-storey red brick lodge with a Tudor-inspired half-timbered gable and high chimneys. It is located to the northern side of the Roehampton Gate entrance.

Significance

3.82 The lodge retains historical value as a well-preserved example of 20th century domestic architecture connected with a park or municipal function. It closely resembles the appearance and function of a traditional lodge, serving purposes such as control, assistance, and marking Richmond

Park's border, in the vicinity of the original lodge location (Figure 4).

Figure 3.12 Roehampton lodge, looking north-east



Contribution to the Site to the asset's significance

3.83 The Site is located at c. 80m to the south of the asset. Trees and a garden are located in between the Site and the asset. The lodge marks one of the entrances to the park and it is perceived as a local landmark with the function of indicating the access to and from the park. The park in general therefore contributes to the significance of the asset by illustrating that historical and functional connection.

3.84 However, the modern use and character of the site make no particular contribution to the significance of the lodge. Intervisibility between the Site and the lodge is partly restricted by intervening vegetation and landscape elements. The Site therefore makes only a minimal contribution to the significance of the lodge as a general part of the overall park.

Archaeological potential

Description

3.85 Richmond Park APA represents a nationally important historic landscape likely to preserve features from the prehistoric period to the modern day. The primary significance of the APA lies in its remarkable extensive survival of a 17th century royal deer park which has been preserved almost totally undeveloped since its early post-medieval enclosure, including nationally important prehistoric monuments (NHLE ref: 1457267; 1457269) attesting human occupation of the area since, at least, the Neolithic period.

Potential within the Site

3.86 The discussion of archaeological potential of the Site is based on the information collected in the baseline chapter, including heritage assets located within the outer study area, archaeological finds and remains, geology and topography elements, GI results and ground disturbance, alongside aerial LiDAR and historic maps consultation.

3.87 Within the Site, limited ground disturbance has occurred, relating to the construction of the Roehampton Gate Café, car and bike park, facilities, services and landscaping features. This development may have truncated and disturbed below ground archaeological remains.

3.88 The archaeological potential for the Site is considered **moderate** for the prehistoric, medieval, post-medieval and modern periods, **negligible** for the Roman period and **low** for the early-medieval period.

3.89 Despite its proximity to Beverley Brook, from a topographical perspective, the lower land where the Site is situated could arguably have been more favourable for prehistoric stable occupation compared to the surrounding higher ground, such as Sidmouth Wood and Dark Hill/Broomfield Hill in Richmond Park, where drier and more prominent locations might have been preferred.

3.90 However, this does not exclude the possibility of prehistoric remains within the Site. Prehistoric remains, potentially resulting from secondary deposition, might be preserved within the Site at considerable depths, including buried surfaces and secondary deposition remains.

3.91 Additionally, there may have been temporary occupation or other forms of landscape exploitation from the late prehistoric period onwards.

3.92 Although not certain, it is possible that the Site, in the medieval period, was part of the Palewell Common (GLHER ref: 143840). Its vicinity with Roehampton village and the manor of Sheen makes likely that the Site surroundings were exploited by the local community and used for hunting by the royal family, who established a palace within the manor area.

3.93 For the Tudors, deer parks were a symbol of power, privilege and prestige. Since the enclosure of Richmond by Charles I, the park included a royal residence and was mostly used by the royals and nobles for hunting. However, the same park also continued its functional use for the local communities as sources of food, fuel and construction material. Therefore, post-medieval archaeological remains related to the occupation, exploitation and park management might be preserved within the Site. Furthermore, 19th century remains of the garden and structures related to the lodge buildings might be preserved within the Site.

3.94 In the modern period, the park was temporarily converted for military purposes, whereas in between the two World Wars and after, golf courses and sport facilities were constructed to the south of the Site.

3.95 Prehistoric, medieval, and post-medieval remains and modern military remains, depending on the level of preservation, significance and extent, might retain **local** to **national** importance, helping understand the nature of human occupation of the park.

Chapter 4

Assessment and conclusions

Proposed development

4.1 The proposed development includes the demolition of the existing buildings within the Site and the construction of new buildings and facilities which include:²⁰

- Café building and cycle hire building connected by a covered seating area;
- Vehicular access – park road, car parking and service access;
- Cycle routes – Tamsin trail and sports cycling, cycle parking;
- Pedestrian circulation – space around outdoor café seating, space around toilets, facilities, cycle hire, gathering space and through flow from car park to park;
- Natural play;
- Swales for water collection, retention, and attenuation;
- Tree, shrub, hedgerow and grassland for habitat, screening, and framing views.

Figure 4.1 Proposed development plan



Image extracted from Roehampton Restored Capital Project report provided by The Royal Parks

²⁰ The Royal Parks. *Roehampton Restored Capital Projects* and David Morley Architects. (2023). *Roehampton Gate Café, Richmond Park: Pre-Application Design Report, February 2023* and Pre-application

response letter from London Borough of Richmond Upon Thames letter (sent 8/06/2023 ref: 21/P0203/PREAPP).

4.2 The proposed development replaces the existing buildings with new structures on a slightly increased footprint. The new buildings are designed to be of a similar scale to other ancillary buildings located within the Royal Parks. They are single storey with an extensive area of flat green roof covering the buildings and linking canopy and a pitched roof over the café area. An area of plant above the back-of-house facilities is screened with vertical cladding. The general roof level is 3.45m above ground level with the pitched roof over the café seating area rising to a maximum of 5.6m.

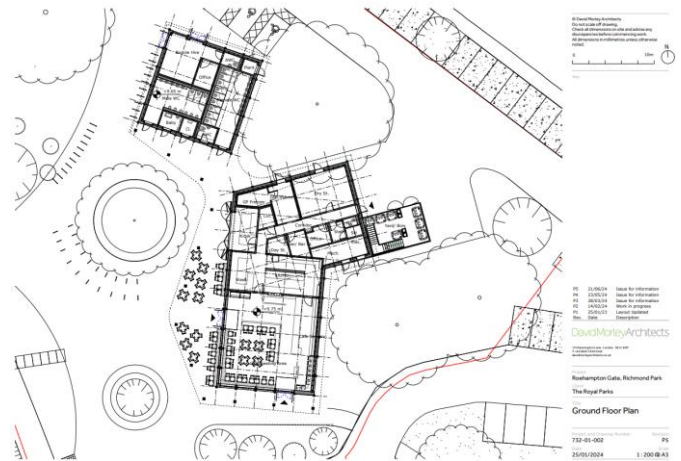
Figure 4.2 Proposed development sketch view



4.3 Building height is designed to be within the height of the background tree line. Construction materials include larch cladding, facing brickwork and weathered zinc and green flat roofs.

4.4 The construction of the building will require a footing foundation of 1.7m depth BGL. Further ground disturbance and localised excavations might be required during the construction phase.

Figure 4.3 Buildings ground floor plan



Assets experiencing physical impacts

4.5 In relation to all affected assets, the proposed development will replace the old buildings with new construction elements within Richmond Park. The proposed use of materials, the buildings' layout and their heights contained within the background tree line help to recede the development into its surroundings. The location of the Site, the existing screening provided by the tree belt to the west of it, as well as the presence of trees and shrubs to the north and south, collectively screen the Site from the rest of the park. The proposed green roof, increased and enhanced areas of habitat, scrub and hedgerow further reduce the visual impact of the proposed development. Landscape layout follows the existing character of the Site. Car parking levels are not increased above existing, while screening of the car park from the park is increased.

Richmond Park Conservation Area impact

4.6 The existing structures do not contribute to the significance of the conservation area, and it will not therefore be harmed by their demolition. The redevelopment of the Site will not significantly alter the appearance and character of the conservation area. The contribution of the Site to the significance of the conservation area is not affected. The unique landscape character of the park will remain fully appreciable and understandable.

Richmond Park Registered Park and Garden (grade I listed; NHLE ref: 209715)

4.7 The scale, height, layout, detailed design and selection of materials of the proposed development, contained within the backdrop of the tree line, harmoniously integrates with the

Site's surroundings and will not be perceived as elements of visual distraction.

4.8 The aesthetic value of this area of the park, its historical illustrative elements, and the connection with the communal history of the place will remain fully appreciable and understandable. No harm is therefore caused to the significance of the asset.

Archaeological Impact

4.9 The proposed development will necessitate demolition and construction phases within the Site, involving ground disturbance and excavations reaching a depth of 1.7m BGL. These activities are likely to affect the integrity and significance of archaeological remains that might be preserved below ground.

Assets experiencing impacts through setting change

Roehampton lodge

4.10 The proposed development's appearance and siting will not draw attention away from the lodge. Its historical and functional relationship with the park will remain fully understandable and appreciable in its purpose of prominent park access structure. No harm will therefore be caused to this asset.

Conclusions

4.11 The dimensions, layout, and profiles of the proposed development, alongside the choice of materials, location, and landscape features, will reduce the intrusion of the new structural elements within the park's sensitive landscape setting, thus limiting the visual impact and integrating the construction with the natural surroundings of the park.

4.12 The proposed development, as designed, will be perceived as new elements of the park replacing the old buildings without detracting from the appreciation of the Richmond Registered Park and Garden (grade I listed; NHLE ref: 209715) and conservation area's significance. The presence of a tree belt and the retention of natural features, combined with the appearance of the proposed development,

will partly screen the Site creating a sense of seclusion from the rest of the park. Its overall impact will therefore be no greater than that of the existing development within the Site.

4.13 Therefore, the significance of Richmond Park Registered Park and Garden, and the special character and appearance of Richmond Park Conservation Area will not be harmed by the proposed development.

4.14 The ground disturbance caused by demolition and construction might affect the integrity of or destroy hitherto unknown archaeological remains preserved within the Site.

Mitigation measures

4.15 The scope and timing of such works have been partly established in consultation with the Greater London Archaeological Advisory Service (GLAAS) through Joanna Taylor. Given the nature of the envisaged archaeological deposits, she recommends that a two-stage archaeological condition be attached to the planning permission if granted.

4.16 If the application is granted, then Stage 1 will apply. This consists of the preparation of a Written Scheme of Investigation (WSI) which will need to be submitted and approved by the local planning authority before any demolition or development takes place on the site. Consequently, an archaeological evaluation will be conducted to determine the presence/absence, significance, and preservation of the archaeological remains.

4.17 If heritage assets of archaeological interests are identified as result of the evaluation, Stage 2 of the archaeological investigation will apply. This will include a second WSI comprehensive of:

- A statement of significance and research objectives;
- Details of the programme for delivering related public benefits; and
- A programme of post-investigation assessment which includes analysis, publication, dissemination of results and deposition of material.

4.18 If Stage 2 is needed, no demolition or development will be allowed before the steps listed above are successfully concluded.

Chapter 5

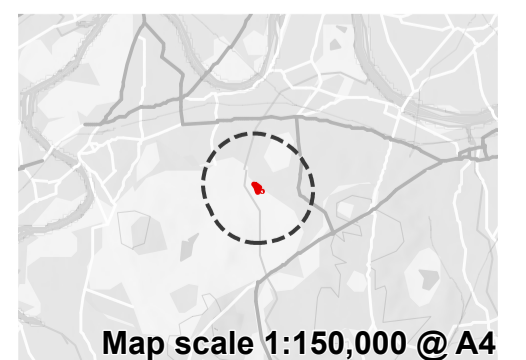
Map Figures

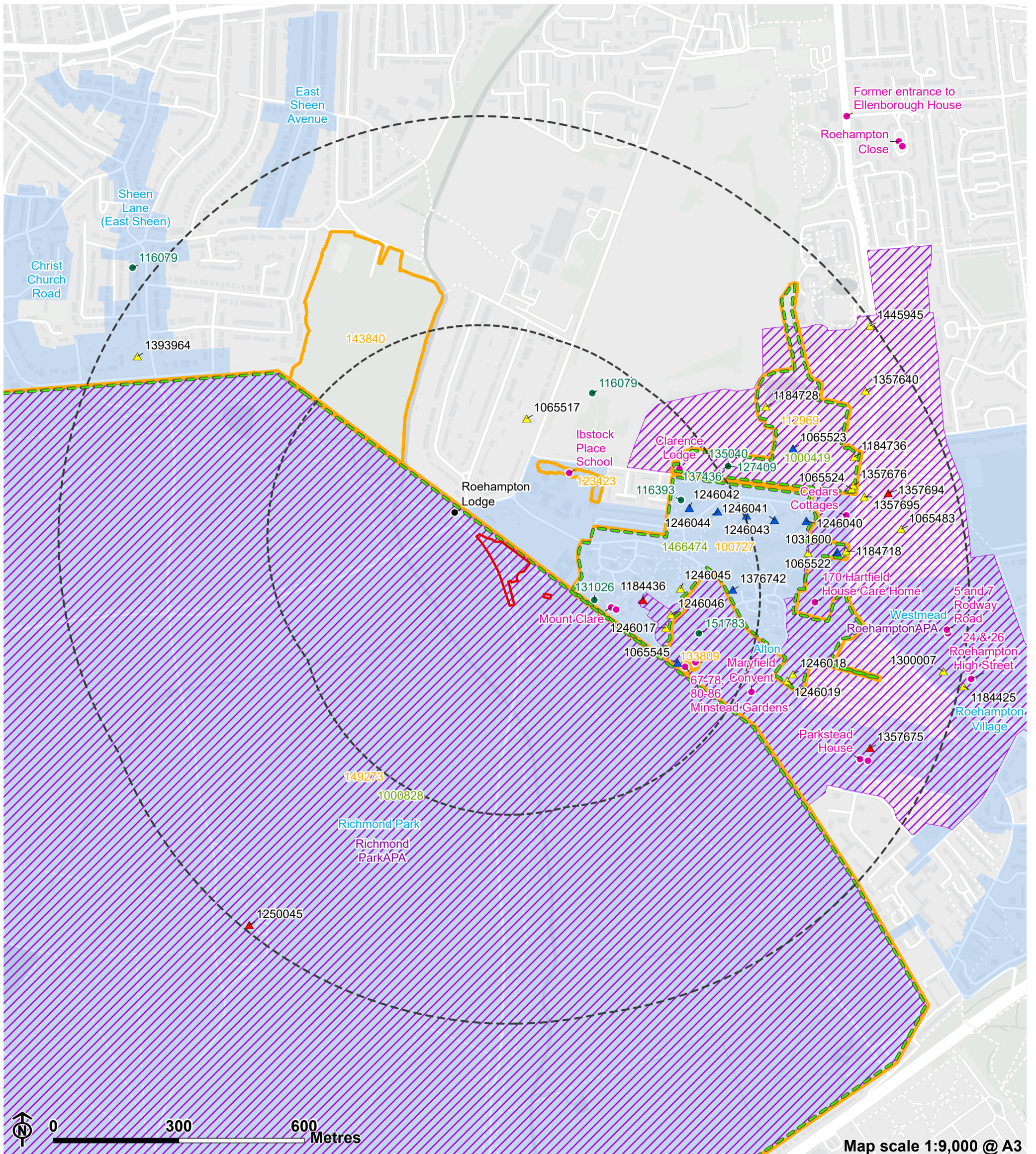


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Figure 1: Site location

- Site boundary
- Study area - 1km

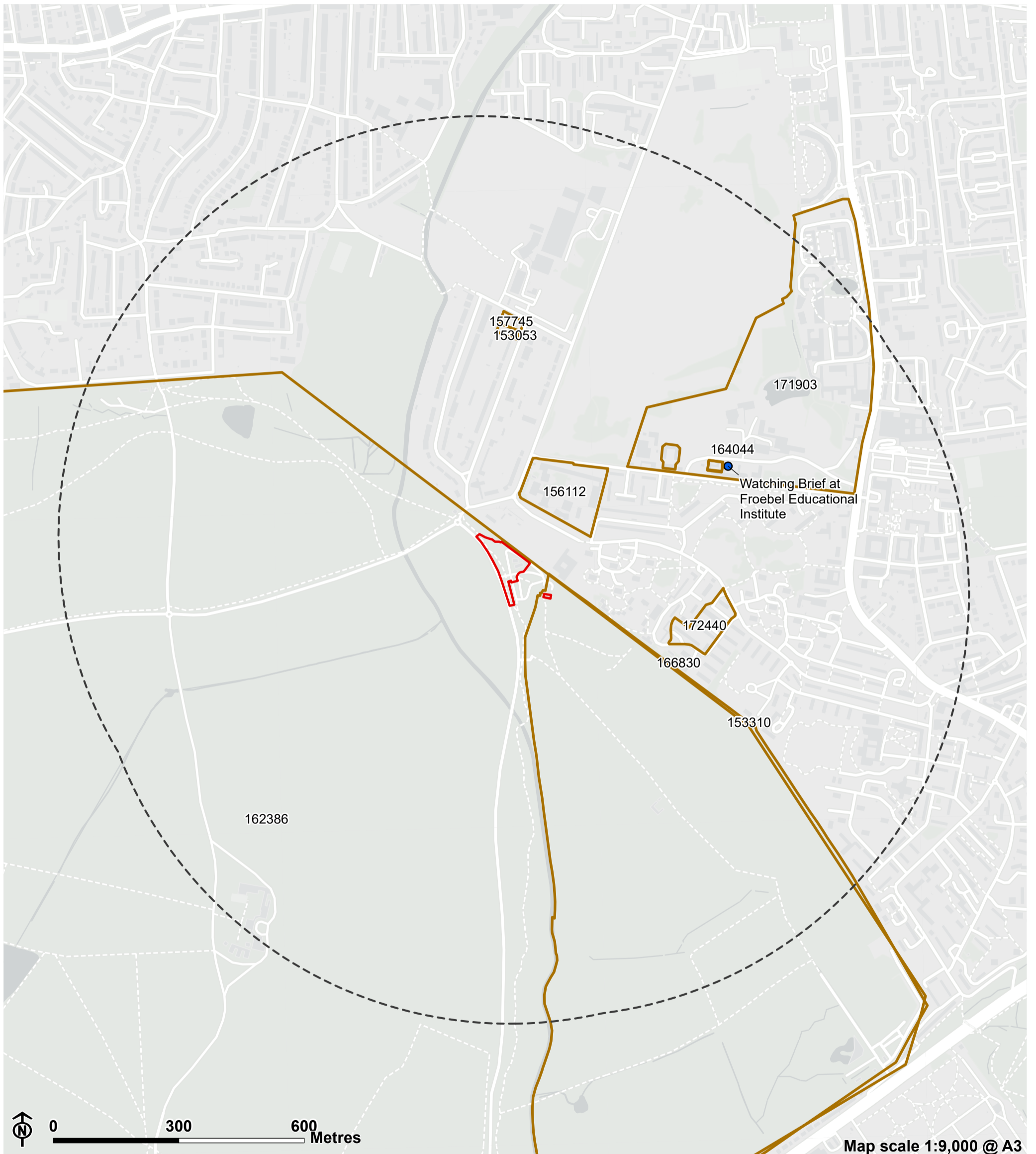




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Figure 2: Site boundary, archaeological investigations within 1km study area

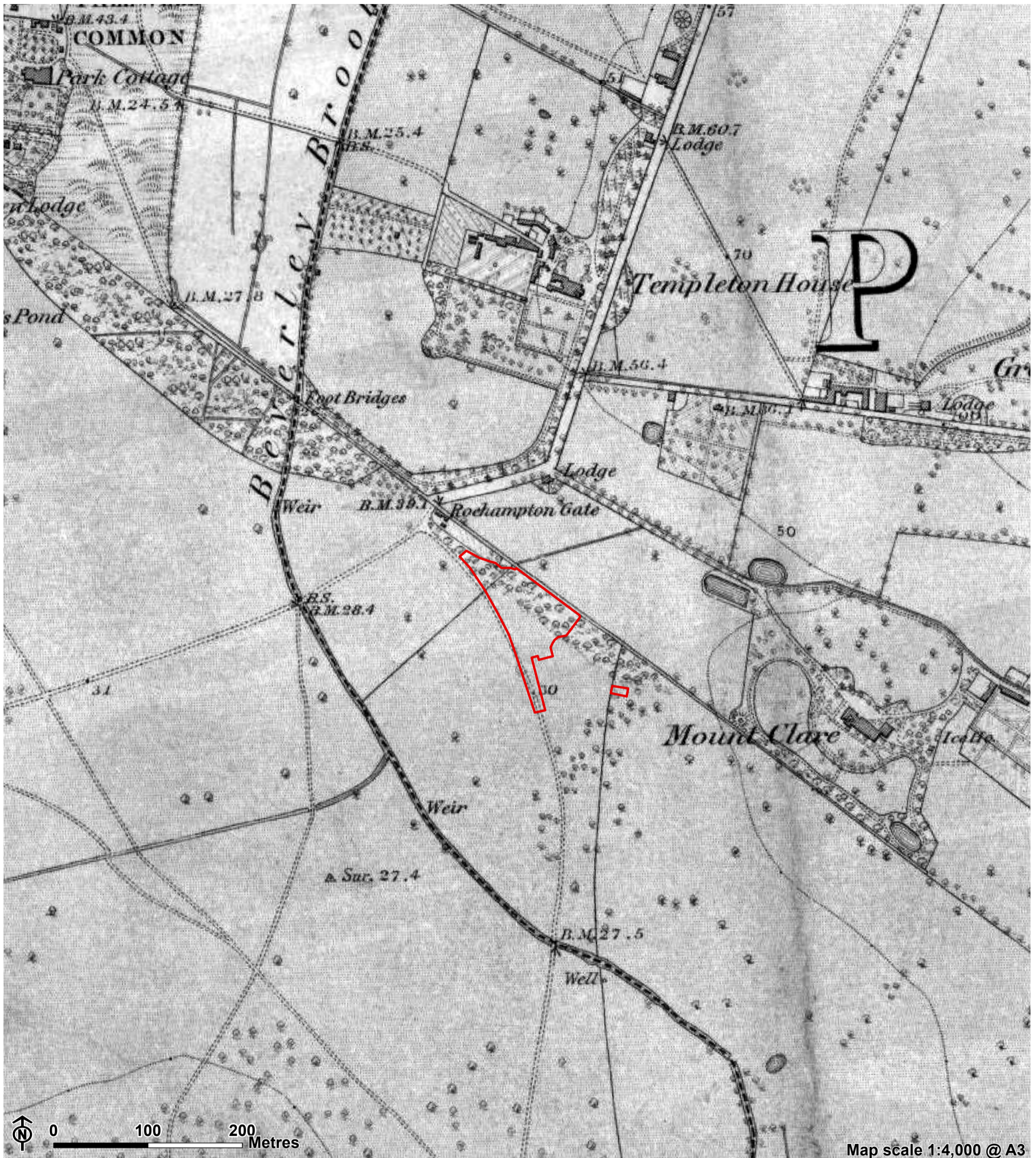
- | | | |
|---|--|---|
| <ul style="list-style-type: none"> Site boundary Study area - 500m Study area - 1km | <p>Designated Assets</p> <ul style="list-style-type: none"> Listed Building ▲ Grade I ▲ Grade II ▲ Grade II* Registered Parks and Gardens Conservation area | <p>Non-designated Assets and HER Entries</p> <ul style="list-style-type: none"> ● LUC assets GLHER entries ● Monument point Monument polygon Archaeological Priority Area ● Locally-listed asset |
|---|--|---|



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Figure 3: Site boundary, archaeological investigations within 1km study area

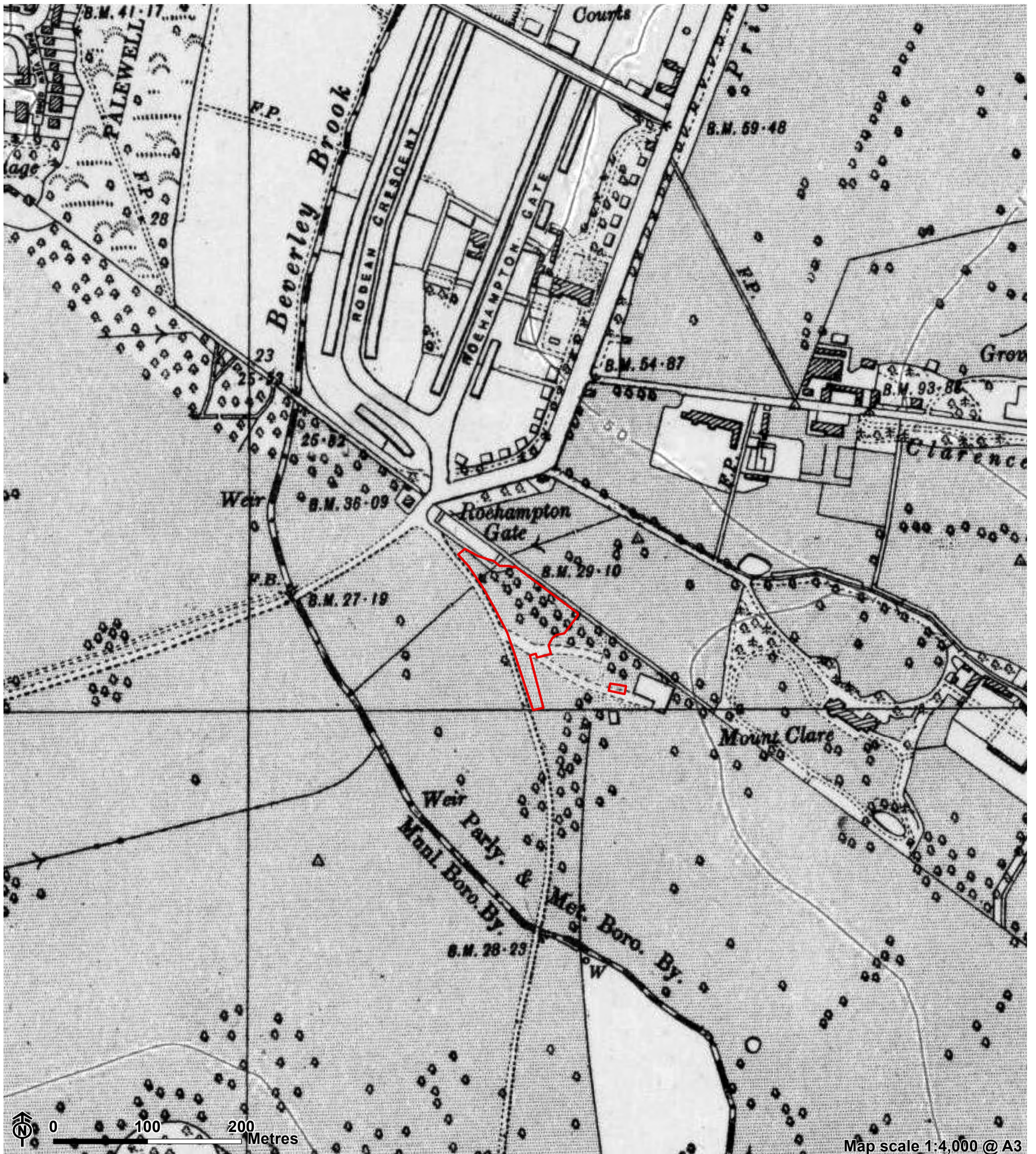
- Site boundary
- Study area - 1km
- Archaeological Investigations**
 - Activity point
 - Activity polygon



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Figure 4: 1865 OS historical map, Six-inch England and Wales, OS map revised: 1912 to 1913 and published 1920, London Sheet N

Site boundary



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Figure 5: 1938 OS historical map, Six-inch England and Wales, revised: 1938 and published 1944, Surrey Sheet VII.NW

Site boundary

Figure 6 Ground investigation plan

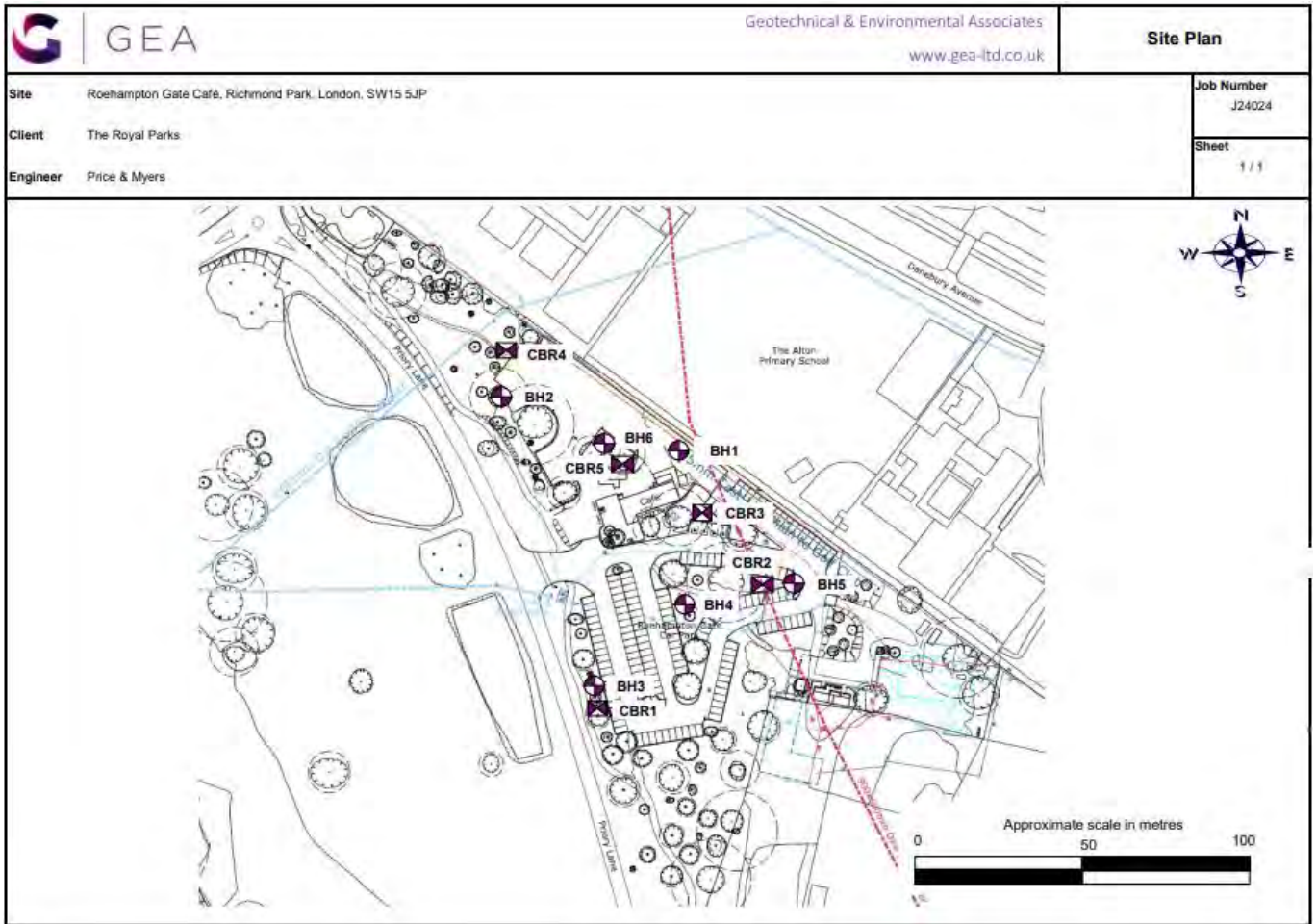
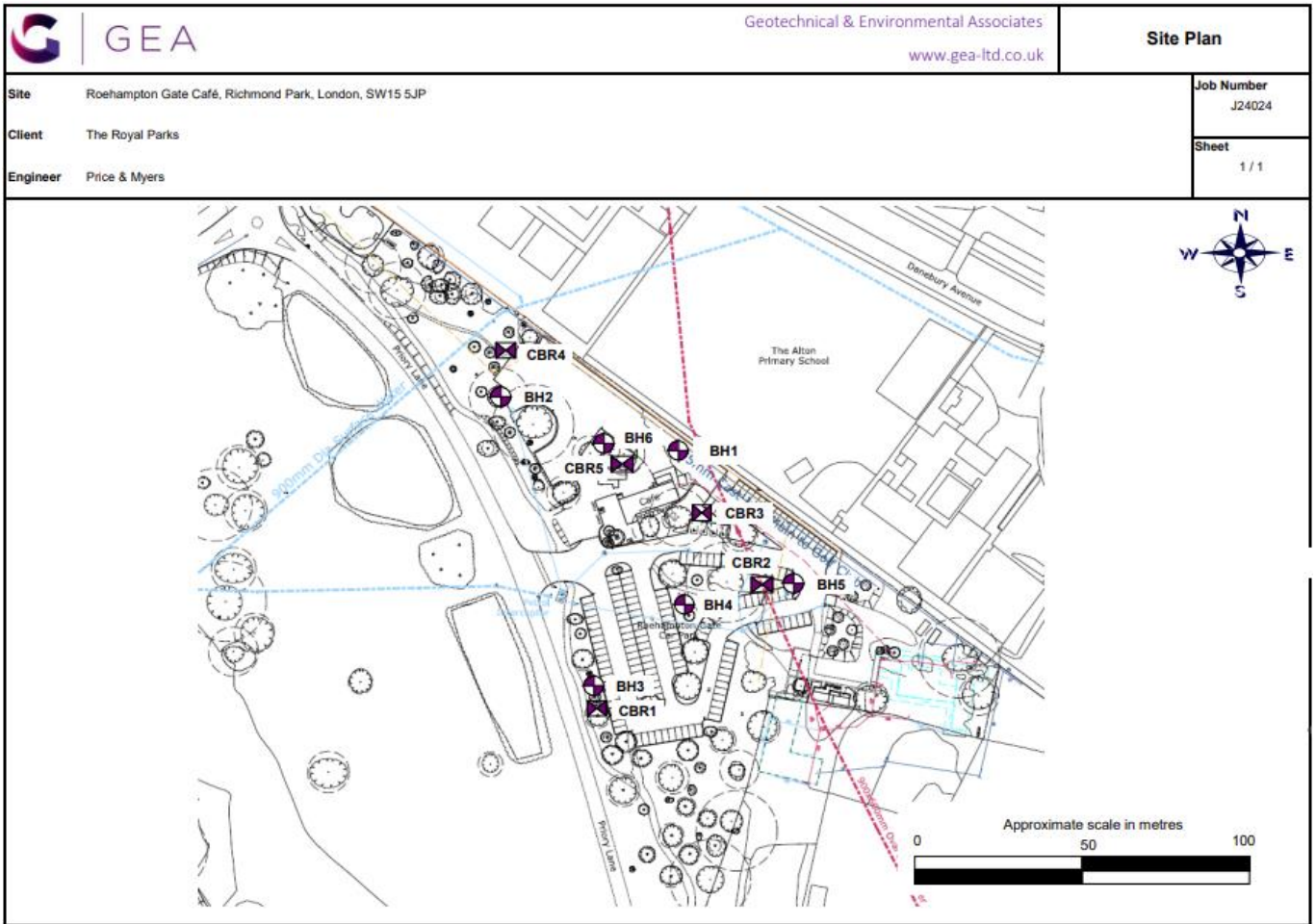


Figure 6 Ground investigation plan



Appendix A

Planning Policy

Table A.1 Relevant paragraphs of the NPPF (December 2023)

Paragraph	Context
196	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.
200	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.
201	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 conflict between the heritage asset's conservation and any aspect of the proposal.
203	In determining planning applications, local planning authorities should take account of: <ul style="list-style-type: none"> 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.
205	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.
206	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: <ul style="list-style-type: none"> a. Grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b. Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Paragraph	Context
207	<p>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:</p> <ul style="list-style-type: none"> a. The nature of the heritage asset prevents all reasonable uses of the site; b. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; d. The harm or loss is outweighed by the benefit of bringing the site back into use.
208	<p>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.</p>
209	<p>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.</p>
211	<p>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.</p>

Table A.2 Relevant local policies

Policy	Context
London Borough of Richmond Upon Thames – Policy LP 3	
Designated Heritage Assets	<p>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:</p> <ol style="list-style-type: none"> 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.

Policy	Context
	<p>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.</p> <p>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.</p> <p>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.</p> <p>9. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.</p> <p>B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:</p> <ol style="list-style-type: none"> 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. <p>C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.</p> <p>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.</p> <p>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.</p>
<p>London Borough of Richmond Upon Thames – Policy LP 4</p>	
<p>Non-Designated Assets</p>	<p>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.</p> <p>■ There will be a presumption against the demolition of Buildings of Townscape Merit.</p>
<p>London Borough of Richmond Upon Thames – Policy LP 5</p>	
<p>Views and Vistas</p>	<p>The Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:</p> <ol style="list-style-type: none"> 1. protect the quality of the views and vistas as identified on the Policies Map, and demonstrate such through computer-generated imagery (CGI) and visual impact assessments; 2. resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline; 3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced; 4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;

Policy	Context
	5. seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured; 6. seek improvements to views within Conservation Areas, which: <ul style="list-style-type: none"> a. are identified in Conservation Area Statements and Studies and Village Plans; b. are within, into, and out of Conservation Areas; c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings.
London Borough of Richmond Upon Thames – 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.
London Borough of Richmond Upon Thames – Policy LP 2	
Building Heights	The Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building heights, by the following means: <ul style="list-style-type: none"> 1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area; 2. preserve and enhance the borough's heritage assets, their significance and their setting; 3. respect the local context, and where possible enhance the character of an area, through appropriate: <ul style="list-style-type: none"> a. scale b. height c. mass d. urban pattern e. development grain f. materials g. streetscape h. Roofscape and i. wider townscape and landscape; 4. take account of climatic effects, including overshadowing, diversion of wind speeds, heat island and glare; 5. refrain from using height to express and create local landmarks; and 6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.
London Borough of Richmond Upon Thames – Policy LP 16	

Policy	Context
<p>Trees, Woodlands and Landscape</p>	<p>A. The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.</p> <p>B. To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will:</p> <p>Trees and Woodlands</p> <ol style="list-style-type: none"> 1. resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice; resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland; 2. resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees; 3. require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT); 4. require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species is encouraged where appropriate; 5. require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations). <p>The Council may serve Tree Preservation Orders or attach planning conditions to protect trees considered to be of value to the townscape and amenity and which are threatened by development.</p> <p>Landscape</p> <ol style="list-style-type: none"> 1. require the retention of important existing landscape features where practicable; 2. require landscape design and materials to be of high quality and compatible with the surrounding landscape and character; and 3. encourage planting, including new trees, shrubs and other significant vegetation where appropriate.

Appendix B

Pre-application Heritage appraisal

B.1 Pre application Heritage appraisal should be insert here as Appendix B.

The Royal Parks (TRP)

Roehampton Gate Café
Pre-Application Heritage
Appraisal

Final report
Prepared by LUC
July 2024



The Royal Parks (TRP)

Roehampton Gate Café Pre-Application Heritage Appraisal

Project Number
12130

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Land Use Consultants Ltd
Registered in England
Registered number 2549296
Registered office:
250 Waterloo Road
London SE1 8RD

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Chapter 1

Heritage Appraisal

Introduction

Site description

1.1 The Site is located within Roehampton Gate car park to the north-east of Richmond Park. It includes Roehampton Gate Café building, some vehicle parking spaces, a cycle hire shop, a path crossing the Site north/south and tarmac roadways. Trees and grass patches bound the Site and the café area. The Site is bounded by the Alton Primary School complex to the north and north-east, Richmond Park Golf Course to the south and sports fields to the west.

1.2 The geology of the Site includes clay, silt, sand and gravel head deposits formed between 2.588 million years ago and the present, overlying London Clay Formation of marine origin.¹

1.3 The Site is located on the north-east boundary of Richmond Park, adjacent to the Roehampton Gate entrance and 1km north-east of the White Lodge (NHLE ref: 1250045). It is fairly flat, with the highest level approximately 10m AOD. The closest watercourse is Beverley Brook which runs parallel to the Site approximately 160m to the west/south-west/south.

Proposed development

1.4 The proposed development will consist of the demolition of existing buildings, revisions to site entrances and layout, construction of new permanent café, public toilets, cycle hub within enhanced hard and soft landscaping.

Purpose of the appraisal

1.5 This appraisal provides a summary of the potential key risks to heritage arising from the proposed development. The report intends to inform The Royal Parks (TRP) at this pre-application stage of possible heritage constraints and options to minimise negative effects on the historic environment.

Sources

1.6 The following information has been reviewed in the preparation of this historic environment appraisal:

¹ <https://geologyviewer.bgs.ac.uk/> (accessed 13/02/2023).

- Designated heritage assets from the National Heritage List for England (NHLE) illustrated in Figure A;
- Conservation Area appraisals;²
- Greater London Archaeological Advisory Service (GLAAS) Archaeological Priority Area (APA) reports for London Borough of Richmond APA Appraisal and London Borough of Wandsworth APA Appraisal;³
- Non-designated asset records held by Greater London Historic Environment Records (GLHER) for a 500m study area illustrated in Figure A;⁴
- British Geological Survey (BGS) geological mapping;⁵ and
- Historical and modern mapping and aerial photography and LiDAR imagery to identify any other substantial historical features not recorded in other sources.⁶

Methodology and study area

1.7 A buffer area of 500m around the Site (hereafter called ‘the study area’) has been used to identify assets with potential to be affected by the proposed development. Assets at a greater distance have also been included where they are considered to have potential to experience effects.

1.8 The report sets out:

- Summary of the baseline;
- Potential constraints; and
- Options to avoid or minimise harm to the historic environment.

1.9 A ‘traffic light’ approach has been used to categorise the heritage risks, as follows:

Table 1.1: Feasibility Risk Category

	Major risk - Likely to be a significant constraint to successful development of the project.
	Moderate risk - Issue may require detailed investigation which may result in an irresolvable constraint.

	Major risk - Likely to be a significant constraint to successful development of the project.
	Minor risk - Unlikely to be a significant barrier to development.

Summary of Baseline

Heritage assets within the Site boundary

1.10 The Site lies within the Richmond Park Register Park and Garden (hereafter called ‘RPG’, grade I; NHLE ref: 209715) and Richmond Park Conservation Area. There are no listed buildings within the Site boundary.

1.11 While not an asset in itself, the Richmond Park APA (GLHER ref: 209715) represents the only identified and potentially significant source of previously unrecognised archaeological assets within the Site. No other hitherto recorded non-designated assets are located within the Site.

1.12 The assets contained within the Richmond Park Conservation Area and RPG are mainly related to the 17th century royal deer park and its medieval and post-medieval hunting use, as part of the Manor of Sheen, and recreational use by the public dating from the later 18th century. (A right of way had been maintained for most of the park’s history since its emparkment by Charles I, and was confirmed by a celebrated court case in 1758. Full public access was confirmed by Act of Parliament in 1872.)

Designated heritage assets within the study area

1.13 Apart from the designated assets listed above, the following designated assets are within the 500m study area surrounding the Site, all in the London Borough of Wandsworth:

- 10 listed buildings of various grades mostly part of the Alton Conservation Area;
- Grove House RPG (grade II listed; NHLE ref: 1000419); and
- Landscaping to Alton Western Estate RPG (grade II listed; NHLE ref: 1466474).

² https://www.wandsworth.gov.uk/media/1575/alton_caaandms.pdf and <https://www.richmond.gov.uk/media/4074/richmondhillstudy5.pdf> (accessed 13/02/2023).

³ <https://historicengland.org.uk/content/docs/planning/apa-richmond-upon-thames-2022-pdf/> <https://historicengland.org.uk/content/docs/planning/apa-wandsworth/> (accessed 13/02/2023).

⁵ <https://www.bgs.ac.uk/> (accessed 13/02/2023).

⁶ Held by National Library of Scotland <https://maps.nls.uk/> and Old Maps Online https://britishlibrary.oldmapsonline.org/compare_LiDAR <https://www.lidarfinder.com/>, and Historic England Aerial Photo Explorer <https://historicengland.org.uk/images-books/archive/collections/aerial-photos/> (accessed 13/02/2023).

1.14 These heritage assets are located to the north and the north-east of the Site, outside of Richmond Park RPG.

1.15 The assets above mentioned mainly relate to the 18th century development of high-status weekend villas and associated gardens and landscaping that developed around the boundary of the Richmond Park. In the case of the Alton RPG, the designed landscapes of Downshire House, Upper Grove House, and Mount Clare were subsumed within the landscaping for Alton West (designed 1952-3; built 1955-58), arguably London County Council's most ambitious and successful post-war development scheme, drawing direct inspiration from Le Corbusier's Unite d'Habitation in Marseilles.

1.16 The assets identified are discussed singularly or in groups in **Table 1.2** below.

Non-designated assets

1.17 Apart from the designated assets mentioned above, within the 500m study area, there are 13 GLHER entries. The study area comprises part of Roehampton APA (GLHER ref: 77413), prehistoric finds (GLHER ref: 131026, 116079) and features (GLHER ref: 127409, 134665, 128125), a medieval settlement (GLHER ref: 116393) and common land (GLHER ref: 143840), post-medieval features (GLHER ref: 151783, 137436) and locally listed buildings (GLHER ref: 133809, 141038, 123423). These entries are discussed together below (**Table 1.2**, also illustrated in **Figure A**, in the legend grouped as monument and point) and as part of the Site's archaeological potential.

Ground disturbance

1.18 Within the Site, limited ground disturbance has occurred. This relates to the construction of the former golf club house café and Pro Shop which occupied the site until 2011, and the current Roehampton Gate Café and related car and bike park, facilities and landscaping features. These developments are likely to have truncated or disturbed below ground archaeological remains. It is, however, unlikely that foundation levels extend much below the current ground surface. An archaeological Desk-Based Assessment (DBA) will help clarify the extent of ground disturbance through historic map regression/aerial photos and recent ground investigation results.

Archaeological potential

1.19 The Richmond Park APA (GLHER ref: 209715) in which the Site is located is a Tier 1. This is because it lies within a nationally important grade I RPG and has high archaeological sensitivity and potential of preserving prehistoric, medieval and post-medieval archaeological remains.

1.20 The proximity of water sources (specifically Beverley Brook), topography and geology make the Site and its environs a fertile area, likely exploited since the prehistoric period, and, in general, suitable for permanent occupation.

1.21 This assumption is corroborated by the collection of prehistoric finds (GLHER ref: 131026, 116079) and the recording of late prehistoric features (GLHER ref: 127409, 134665, 128125) within the study area.

1.22 Furthermore, within Richmond Park, outside of the study area, ritual and funerary scheduled monuments (NHLE ref: 1457267, 1457269) attest the human occupation of the area during the Neolithic and Bronze Age period.

1.23 Therefore, the Site has the potential to preserve archaeological remains of prehistoric date. Its topographic position (at lower level compared to the White Lodge NHLE ref: 1250045) and a possible stratigraphic sequence of geological head deposits might preserve remains *in situ* or finds in secondary deposition at greater depth. Therefore, they may have been less disturbed by superficial activity and possibly in a state of better preservation.

1.24 Scarce evidence of Roman and early medieval activity within the wider area suggests limited occupation and activity for these periods.

1.25 The study area includes a medieval settlement (GLHER ref: 116393), and an area of common land (GLHER ref: 143840), while the Site, as part of Richmond Park RPG (grade I listed; NHLE ref: 1000828), became part of a vast royal deer park during the early modern period.

1.26 The topography and the relative proximity to water sources make the Site a suitable area for agricultural activity. The short distance from the medieval settlement and common land exploited during the medieval period, as well as the substantial quantity of agricultural and land management features extant within Richmond Park, suggest a possible use of the Site for agriculture. Therefore, medieval archaeological remains related to agricultural and park management activity may be preserved within the Site.

1.27 In the early post-medieval period, Richmond Park continued to be used as a royal hunting park. Henry the VIII and Elizabeth I hunted in the park, while King Charles I introduced several changes. One of the most important changes was enclosing the park. Roehampton Gate, now a toponym, is likely to be the result of the King Charles I enclosure and denotes one of the entrances to the park.

1.28 The 1764 Roche map⁸ illustrates the gate and the enclosure (the latter bounded the north of the Site); while the Site itself is illustrated as grassland with a few trees.

1.29 Further archaeological features are attested within the study area and include a post-medieval pond (GLHER ref: 151783) and waste disposal site (GLHER ref: 137436), probably related to the alterations to Roehampton/Grove House (NHLE ref: 457267,1457269). The 1st edition of the OS 25-inch map⁹ shows the Site as open parkland, with a belt of trees to the park boundary. The Roehampton Gate lodge is depicted on the southern side of the entrance, but appears to have been demolished by the 1911 revision, replaced by the

extant lodge to the north of the drive, built in 1900. The later OS maps illustrate that the Site remained almost the same, with minor later alterations, until the second half of the 20th century, when the Roehampton gate café was built.

1.30 Above ground parkland features, for the medieval and post-medieval period, include field boundaries, trackways, hedgerows, wood pasture and ridge and furrow, as well as evidence of pollarding on older trees.

1.31 Post-medieval agricultural and park management features related to the RPG and similar to those listed in the previous paragraph might be preserved within the Site.

Potential constraints

Table 1.1: Summary of potential historic environment constraints

Heritage receptor	Entry Number	Description/commentary	Feasibility risk category
Richmond Park RPG Grade I	NHLE ref: 209715	<p>Royal deer park with late medieval origins, imparked by King Charles I and improved by subsequent monarchs. It includes plantations, woodlands, avenues, routes, ponds and water courses, listed buildings related to the use of the park and scheduled monuments of prehistoric dates.</p> <p>Key elements of the asset within the study area are:</p> <ul style="list-style-type: none"> ■ Roehampton Gate entrance located to the north-west of the Site; ■ The road to the west of the Site which soon after the gate branches in two, carrying on to the south and west of the park; ■ Pond and brook to the west and west/south-east of the Site. <p>Listed buildings and scheduled monuments within the Richmond Park are located at a greater distance from the Site and outside the study area, except for White Lodge (NHLE ref: 1250045).</p>	<p>The construction of a new, taller café building might change the perception of the building in relation to the park due to the new elevation and layout. The design and the singular structural elements could distract from the appreciation of the RPG, which might lead to adverse effects.</p> <p>The location and the height of the building are not predicted to affect RPGs, listed buildings and scheduled monuments which are located outside of the study area (at the east and south of the RPG). However, there might be some intervisibility between White Lodge (NHLE ref: 1250045) and the Site. This will require further assessment.</p> <p>The potential for the development to result in visual intrusion within the RPG, and how this might affect the sequential experience of travelling through the park, and the site's relationships with key features, will require testing to identify potential effects and recommend appropriate measures for avoidance/minimisation.</p> <p>In conclusion, the revisions of the site entrances and layout, construction of public toilets, cycle hub and associated</p>

⁸ <https://britishlibrary.oldmapsonline.org/compare> (accessed 15/02/2023).

⁹ London first edition OS map, LXXII, surveyed in 1867 and published in 1871 [View map: Ordnance Survey, London \(First Editions c1850s\)](#)

[LXXII \(Mortlake: Wandsworth Borough\) - Ordnance Survey 25 inch England and Wales, 1841-1952 \(nls.uk\)](#) (accessed 15/02/2023).

Heritage receptor	Entry Number	Description/commentary	Feasibility risk category
			<p>hard and soft landscaping are not predicted to substantially affect the significance of the asset (archaeological remains excluded). However, the larger scale and mass of development, increased visibility and footprint - along with the current materiality of the proposal – suggests that it may be more intrusive than the existing suite of buildings. Proposals will require careful testing to ensure that the design remains subservient to the historic features of the park, and sits comfortably with the character of this part of the RPG. Careful handling of design iterations and engagement with the Borough and Historic England will be necessary.</p>
<p>Grove House RPG Grade II</p>	<p>NHLE ref: 1000419</p>	<p>Mid-18th century gardens and pleasure grounds of a villa, with 19th century alterations and laid out within a wider setting dating from the late 18th to early 19th century.</p>	<p>There is no predicted intervisibility between the asset and the Site due to intervening development and vegetation. It bears no notable relationship with the site beyond proximity. Therefore, the Site does not contribute to the significance of the asset nor is redevelopment of it predicted to affect the asset.</p>
<p>Landscaping to Alton West Estate RPG Grade II</p>	<p>NHLE ref: 1466474</p>	<p>Landscaping to Alton West Estate was carried out between 1954-1961 by the LCC Architect's Department. The site incorporates two adapted 18th century landscapes, including the remnants of one by Capability Brown (1774-1775) and includes one of the most important examples of low-cost mass housing built in brutalist style.</p> <p>The landscaping is the result of juxtaposition of innovative post-war housing integrated with the 18th century landscape. The 18th century landscape associated with Mount Clare and other high-status buildings (Downshire House located outside of the study area) was preserved with the design and the layout of post-war housing development. Specifically, the buildings were placed considering, views, approaches, trees and</p>	<p>There might be some intervisibility between the Site and the asset, although quite limited by intervening vegetation and development.</p> <p>Part of the significance of the asset lies in the visual relationship between Richmond Park and the 18th century landscape part of the asset. This visual connection would not be substantially altered by the proposed development.</p> <p>As part of Richmond Park, the Site makes minimal contribution to the significance of the asset, therefore the proposed development is not predicted to substantially affect the asset significance.</p>

Heritage receptor	Entry Number	Description/commentary	Feasibility risk category
		topography, making them an integral part of the 18 th century landscape without altering its setting.	
Alton Conservation Area		<p>The Alton Conservation Area part which lies within the study area includes several listed buildings of different grades which can be grouped as 18th century smart weekend villas (Mount Clare, grade I listed; NHLE ref: 1065545) and post-war low-cost housings (bungalow terraces – grade II listed; NHLE ref: 1246017, 1246045, 1246046 – and maisonettes blocks – Grade II* listed; NHLE ref: 1246017, 1246045, 1246046).</p> <p>The two building groups – despite different dates, style and character and thanks to the 20th century design – interact harmoniously, preserving the setting of the previous 18th century landscape and enhancing historic layout and the architectural quality of buildings.</p>	<p>There might be some intervisibility between the Site and the asset, although quite limited by intervening vegetation and development.</p> <p>The significance of the conservation area lies, in part, in the visual relationship between Richmond Park and the 18th century landscape part of the asset. The 18th century houses were built in that location to have a privileged view and connection with Richmond Park. This visual connection would not be substantially altered by the proposed development.</p> <p>As part of Richmond Park, the Site makes minimal contribution to the significance of the asset, therefore the proposed development is not predicted to substantially affect the asset significance.</p>
Richmond Park Conservation Area		This includes listed buildings within Richmond Hill built between the 18 th and 19 th century. However, no listed buildings belonging to the Conservation Area are comprised within the study area, and they are located at a great distance from the Site.	<p>The Site lies within the asset's extent; however, the majority of the listed buildings that form part of the Conservation Area are not intervisible with the Site. Furthermore, the tree coverage and the location of the Site, topographically situated at the base of the north-east slope, grant a limited visibility of the Site from the listed buildings and from the main viewpoints, avenues, edge of the woodland and ponds and routes.</p> <p>The White Lodge (NHLE ref: 1250045) listed building might have some intervisibility with the Site. A field walk would help to determine visual effects on the asset significance.</p> <p>Therefore, the Site might contribute to the significance of the asset although it is not predicted to substantially affect it.</p>
Templeton House Listed building Grade II	NHLE ref: 1065517	Mansion house built in the 18 th century, comprising three-storeys with later alterations. It is located to the north of the Site, outside the Alton Conservation Area. Although not part of the Conservation	There is no predicted intervisibility between the asset and the Site due to intervening development and vegetation. It bears no notable relationship with the site beyond proximity. Therefore, the Site does not

Heritage receptor	Entry Number	Description/commentary	Feasibility risk category
		Area, it still represents one of the high-status houses built in the Georgian period by the upper-class individuals in the surrounding of Richmond Park.	contribute to the significance of the asset nor is predicted to affect it.
Temple in Grounds of Mount Clare Listed building Grade II*	NHLE ref: 1065545	Mid-18 th century Temple in grounds of Mount Clare in Greek Doric style, modelled on illustration from Stuart and Revett, with sculptured panels in portico and interior and coved frescoed ceiling. Not built <i>in loco</i> but brought to the current location in the early 20 th century and possibly designed by Sir William Chambers.	There is no predicted intervisibility between the asset and the Site due to intervening golf course and vegetation. It bears no notable relationship with the site beyond proximity. Therefore, the Site does not contribute to the significance of the asset nor is predicted to affect it.
Mount Clare Listed Building Grade I	NHLE ref: 1184436	18 th century high status two-storey house with basement decorated with stucco and in Doric style. Garden and landscaping are attributed to Capability Brown. The building is part of a group of smart weekend villas built in the early 18 th century, near Richmond Park.	There is no predicted intervisibility between the asset and the Site due to intervening golf course and vegetation. It bears no notable relationship with the site beyond proximity. Therefore, the Site does not contribute to the significance of the asset nor is predicted to affect it.
15-33, Minstead Gardens, Numbers 2-26 with retaining Walls, 1-13 Minstead Gardens Listed buildings Grade II and Locally listed building.	NHLE ref: 1246017, 1246045, 1246046; GLHER ref:133809, 141038	Several mid-20 th century blocks of staggered bungalow terraces initially built for old-age pensioners. They represent mixed development low-cost houses built to suit all ages and needs of the Alton community. They also form a strong group to the east of the 18 th century Mount Clare building, preserving its character and setting.	There is no predicted intervisibility between the assets and the Site due to intervening development and vegetation. It bears no notable relationship with the site beyond proximity. Therefore, the Site does not contribute to the significance of the assets nor is predicted to affect it.
Dunbridge House, Charcot House, Denmead House Listed buildings Grade II*	NHLE ref: 1246042, 1246043, 1246044	Three mid-20 th century brutalist style blocks of maisonettes. Reinforced concrete in-situ frame of board-marked concrete now painted, with storey-height prefabricated concrete panels with Dorset shingle and Derbyshire spar exposed aggregate and flat roof. The proportions are based on his 'Modulor' and the Fibonacci number sequence. The expression of each maisonette as an individual element in the facade. The relationship of the blocks to each other and the landscape has been considered a 'majestic' piece of town planning.	There is no intervisibility between the assets and the Site due to intervening development and vegetation. It bears no notable relationship with the site beyond proximity. Therefore, the Site does not contribute to the significance of the assets nor is predicted to affect it.

Heritage receptor	Entry Number	Description/commentary	Feasibility risk category
<p>The bull at foot of Downshire Field Alton Estate</p> <p>Listed building GII*</p>	<p>NHLE ref: 1376742</p>	<p>1961 bronze shaggy expressionistic decorative sculpture of a bull. It was cast by Robert Clatworthy and located in the garden to the north of Danebury Avenue as a part of Tangley grove estate.</p>	<p>There is no intervisibility between the assets and the Site due to intervening development and vegetation. The sculpture is contained within the surrounding garden and appreciable only within it. Therefore, the Site does not contribute to the significance of the assets nor is predicted to affect it.</p>
<p>Ibstock Place School</p> <p>Locally listed</p>	<p>GLHER ref:123423</p>	<p>School built in a Georgian style between 1898 and 1916. It is a two-storey building of red brick and extended to the west and south in the mid-late 20th century with later alterations.</p>	<p>There is no intervisibility between the assets and the Site due to intervening development and vegetation. It bears no notable relationship with the site beyond proximity. Therefore, the Site does not contribute to the significance of the assets nor is predicted to affect it.</p>
<p>Richmond Park APA and Archaeological Potential</p>	<p>GLHER ref:209715</p>	<p>Richmond Park APA represents a nationally important historic landscape likely to preserve features from the prehistoric period to the modern day.</p> <p>The primary significance of the APA lies in its remarkable extensive survival of a 17th century royal deer park.</p> <p>Prehistoric archaeological remains have been recorded within the asset extent and in its immediate surroundings; whereas ritual & funerary scheduled monuments (NHLE ref: 457267,1457269) are partly preserved and appreciable above ground. Potential for early prehistoric occupation is also represented by concentrations of lithic scatters.</p> <p>Medieval human occupation within the asset's extent is attested by archaeological data related to agricultural and domestic land use, as well as records of the construction/use of the hunting park from the 14th century.</p> <p>Parkland features, for the medieval and post-medieval period, include field boundaries, trackways, hedgerows, wood pasture and ridge and furrow, as well as evidence of pollarding on older trees.</p>	<p>Potential archaeological remains related to the RPG human occupation and hitherto unknown non-designated assets might be disturbed or destroyed by the proposed development construction.</p> <p>Archaeological desk-based assessment and potential pre-development investigations will be required to establish the likelihood of encountering significant features and set out mitigation measures to avoid/minimise harm and loss.</p>

Heritage receptor	Entry Number	Description/commentary	Feasibility risk category
		Some of them are still visible above ground, some others might preserved below ground together with hitherto unknown human occupation remains of previous periods.	

Options for avoiding or minimising harm to heritage assets

1.32 The majority of the above assets are not in the immediate vicinity of the Site, and their intervisibility with the Site is often screened by intervening development and tree coverage.

1.33 No major risk deriving from the proposed development has been identified for any of the assets located within the study area.

1.34 A moderate level of risk has been identified in relation to:

- Richmond Park RPG (grade I listed; NHLE ref: 209715) and Conservation Area;
- Richmond Park APA (GLHER ref: 209715);
- Landscaping to Alton West Estate RPG (Grade II listed; NHLE ref: 1466474); and
- Alton Conservation Area.

1.35 The Richmond Park RPG, Conservation Area and APA would experience direct physical effects as well as setting changes. The remaining RPG and Conservation Area would experience setting changes. The setting changes predicted are not identified as substantially harmful to the assets' significance. The height of the café' building is considered to be the principal element potentially affecting the character of the RPG and CA, and influencing the setting of assets.

1.36 This harm can be minimised through careful siting and design of the building and associated landscaping, but it is unlikely to be avoidable. Careful choice of materials will be paramount to minimising any visual impact, whilst high-quality design will be needed to help justify and offset this larger intervention into the Richmond Park RPG.

1.37 A Heritage Statement would be necessary to assess the proposed development effects on the RPGs, Conservation Areas and listed buildings significance and to advise on how to minimise any harmful effects.

1.38 Physical effects are predicted for the archaeological potential of the Site represented by the APA. Therefore, early engagement with Greater London Archaeology Advisors and

Historic England is recommended. A full, ClfA-compliant archaeological DBA will be necessary to inform understanding of the Site's archaeological interest and potential. The DBA will also inform how to possibly avoid or mitigate harm or loss of below-ground heritage assets present within the Site.

1.39 The heritage assessments mentioned would assist in targeting development in less sensitive areas and forming recommendations on layout and detailing of footings, etc, to avoid or minimise harm (i.e. managing the café building height). A Historic Environment Assessment would fulfil the purpose of both Heritage Statement and DBA.

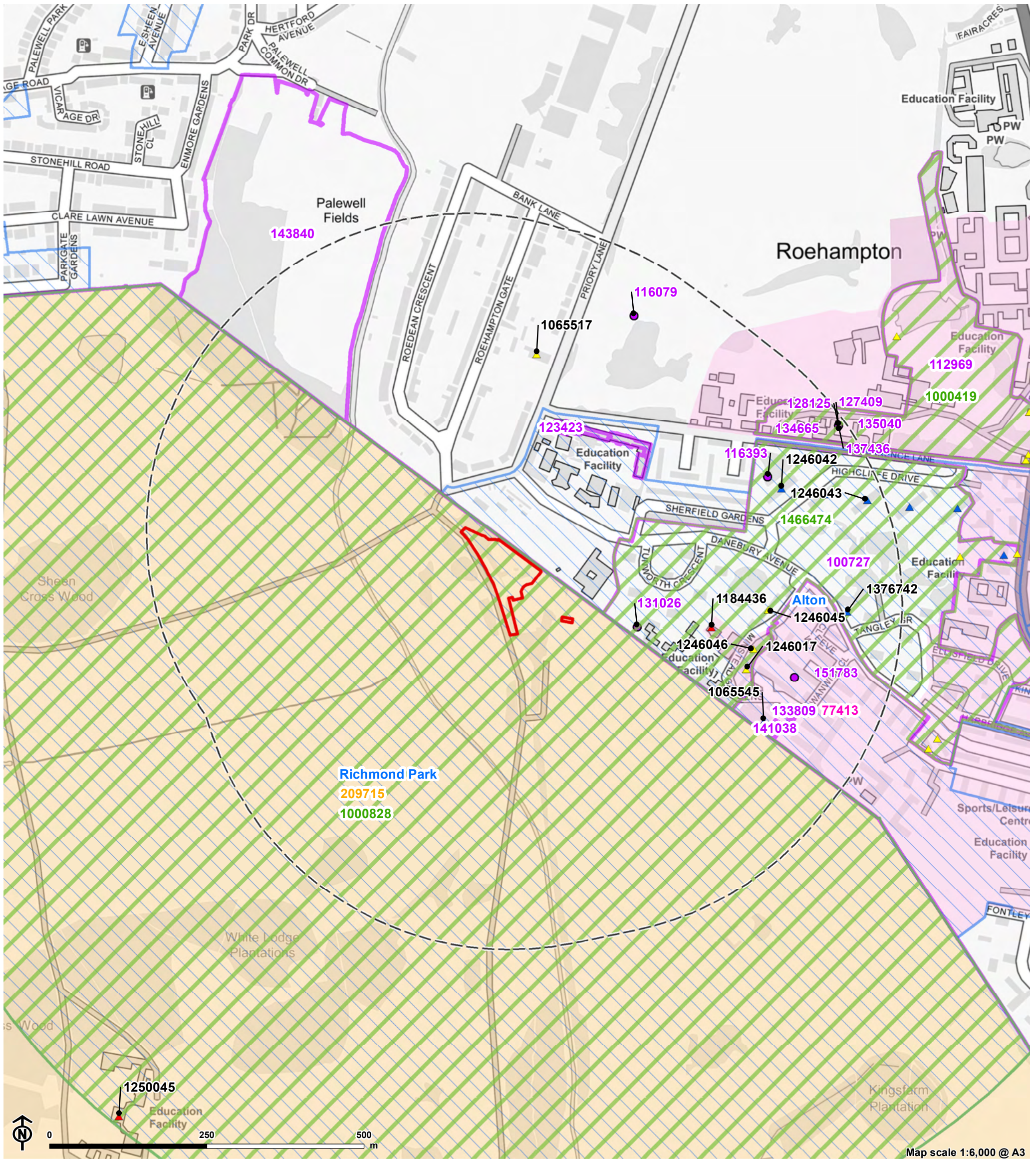
1.40 Finally, in all cases above, some level of harm to the significance of heritage assets may be considered acceptable by decision-makers if:

- it is demonstrated that options have been considered which avoid or reduce harm as far as possible, so that any resulting harm is the lowest necessary to achieve the required outcome;
- the public benefits arising from the proposed development are outlined in full to counterbalance any harm caused to the historic environment; and
- the proposed building is of outstanding / innovative design.

Potential opportunities

1.41 Opportunities might arise from replacing buildings of little architectural merit with new ones of greater design quality. It could also represent an opportunity to consolidate the public realm and street furniture that has developed piecemeal around the café (signage, bins, information boards, bollards, fencing, benches etc.) in favour of a more coherent and cohesive scheme.

1.42 These opportunities, if realised, may be considered benefits as part of the planning balance, but they would not negate any harm that would also result from the development. It would still be necessary to demonstrate that harm has been avoided or minimised where possible through design – with clear and convincing justification for any residual harm – regardless of what public benefits there may be.



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CB:LT EB:Tembo_L LUC 12130_001_r0_TRP_RoehamptonGateCafe_A3P 24/02/2023
Source:LUC,HE

Figure A: Site, Designated Heritage Assets and GLHER

- | | |
|------------------------------|----------------------|
| Site boundary | GLHER entries |
| Study area | Point |
| Listed Building: Grade I | Richmond APA |
| Listed Building: Grade II* | Roehampton APA |
| Listed Building: Grade II | Monument |
| Conservation Area | |
| Registered Parks and Gardens | |

Notes:

White Lodge Listed building at South West base of map

Appendix C

Ground investigation stratigraphic sequence

Table C.1: Borehole stratigraphic sequence

Deposits	Borehole 1	Borehole 2	Borehole 3	Borehole 4	Borehole 5	Borehole 6
Made ground	0.00m – 0.60m	0.00m – 0.30m	0.00m – 0.20m	0.00m – 0.30m	0.00m – 0.60m	0.00m – 0.30m
Made ground	–	–	0.20m – 0.60m Dark grey to black gravelly sand with clinker and ash	0.30m – 0.50m Dark brown sandy gravelly clay with angular flint, brick clinker, coal and ash	0.60m – 0.70m Light grey gravelly sand with sub rounded flint, brick and concrete	–
Clay	–	0.30m – 1.1m Light brown silty gravelly clay	0.60m – 1.60m Light brown silty gravelly clay	0.50m – 1.00m Light brown silty gravelly clay	0.70m – 1.00m Light grey brown silty gravelly clay	0.30m – 1.20m Light brown gravelly sandy clay
Sand	–	1.1m – 1.50m Light brown clayey silty sand	1.60 – 2.00m Light brown gravelly silty sand	1.00m – 1.60m Light brown gravelly silty sand	–	1.20m – 1.80m Light brown silty gravelly sand
Silt	–	–	–	–	–	1.80m – 2.00m Light brown 7 grey sandy silt
Clay	–	–	–	–	1.00m – 1.60m orange brown gravelly silty clay	–
Clay	–	–	–	–	1.60m – 2.20m brown gravelly silty clay with flint	–
Sand	–	1.50m – 3m Light brown silty gravelly sand	2.00m – 2.10m Medium brown gravelly silty sand	1.60m – 3.00m Medium brown gravelly silty sand	–	2.00m – 3.00m Light brown silty gravelly sand
Silt	–	–	2.10m – 2.20m Brown sandy silt.	–	–	–

Appendix C
Ground investigation stratigraphic sequence

TRP Roehampton Gate Café
July 2024

Deposits	Borehole 1	Borehole 2	Borehole 3	Borehole 4	Borehole 5	Borehole 6
Clay	–	–	–	–	2.20m – 3.00m Brown mottled blue grey clay	–
Sand	–	–	2.20m – 3m Brown gravelly silty sand .	–	–	–

Appendix D

Scoping table and site visit review

Section 1: Scoping table

Table D.1 Designated and non-designated heritage assets within the inner study area

Heritage Asset	Entry Number	Description	Significance and reasoning	Assessment inclusion/exclusion
Richmond Park RPG Grade I	NHLE ref: 209715	Royal deer park with late medieval origins, improved by King Charles I and improved by subsequent monarchs. It includes plantations, woodlands, avenues, routes, ponds and water courses, listed buildings related to the use of the park and scheduled monuments of prehistoric dates.	The asset retains evidential, historical illustrative, aesthetic and communal values. The significance is fully described in Chapter 3 .	In The Site is part of the heritage asset. The introduction of new developments, even if they replace existing ones, might establish elements of distraction for the appreciation of the rural character, drawing the attention towards them.
Richmond Park Conservation Area		17 th century deer park and designed landscape park. This includes listed buildings within Richmond Hill built between the 18th and 19th century.	Post-medieval character and appearance of a unique royal deer and landscape park. The significance is fully described in Chapter 3 .	In The Site is part of the heritage asset. The introduction of new developments, even if they replace existing ones, might establish elements of distraction for the appreciation of the rural

Heritage Asset	Entry Number	Description	Significance and reasoning	Assessment inclusion/exclusion
				character, drawing the attention towards them.
Grove House RPG Grade II	NHLE ref: 1000419	Mid-18th century gardens and pleasure grounds of a villa, with 19th century alterations and laid out within a wider setting dating from the late 18th to early 19th century.	The asset retains primarily evidential, historical illustrative and aesthetic values as example of 18 th century landscape park. There is no intervisibility between the asset and the Site due to intervening development and vegetation. Furthermore, the Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development
Landscaping to Alton West Estate RPG Grade II	NHLE ref: 1466474	Landscaping to Alton West Estate incorporates two adapted 18th century landscapes, including the remnants of one by Capability Brown (1774-1775) and includes well preserved examples of low-cost mass housing built in brutalist style.	The asset retains historical illustrative There is no intervisibility between the asset and the Site due to intervening development and vegetation. Furthermore, the Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development See Appendix D Section 2.
Alton Conservation Area		The Alton Conservation Area part which lies within the study area includes several listed buildings of different grades which can be grouped as 18th century smart weekend villas (Mount Clare, grade I listed; NHLE ref: 1065545) and post-war low-cost housings (bungalow terraces – grade II listed; NHLE ref: 1246017, 1246045, 1246046 – and maisonettes blocks – Grade II* listed; NHLE ref: 1246017, 1246045, 1246046).	The asset retains historical illustrative and aesthetic values as it preserve the 20 th century appearance and character deriving mostly by brutalists and modernist buildings designed as contained harmoniously within 18 th century Landscaping to Alton West Estate park's setting.	Out Its significance will not be affected by the proposed development See Appendix D section 2.
Templeton House Listed building Grade II	NHLE ref: 1065517	Mansion house built in the 18 th century, comprising three-storeys with later alterations. Although not part of the conservation area, it still represents one of the high-status houses built in the Georgian period by the upper-class individuals in the surrounding of Richmond Park.	The asset retains historical illustrative and aesthetic values, as well preserved example of 18 th century mansion house. There is no intervisibility between the asset and the Site due to intervening development and vegetation. Furthermore, the Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development

Heritage Asset	Entry Number	Description	Significance and reasoning	Assessment inclusion/exclusion
Temple in Grounds of Mount Clare Listed building Grade II*	NHLE ref: 106545 GLHER ref: 147708	Mid-18 th century building constructed in Greek Doric style, modelled on illustration from Stuart and Revett, with sculptured panels in portico and interior and coved frescoed ceiling. Not built in loco but brought to the current location in the early 20th century and possibly designed by Sir William Chambers.	The asset retains historical illustrative and aesthetic values, as example of 18 th century decorative temple. There is no intervisibility between the asset and the Site due to intervening development and vegetation. Furthermore, the Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development
Mount Clare Listed Building Grade I	NHLE ref: 1184436	18 th century high status two-storey house with basement decorated with stucco and in Doric style. Garden and landscaping are attributed to Capability Brown. The building is part of a group of smart weekend villas built in the early 18th century, near Richmond Park.	The asset retains historical illustrative and aesthetic values, as well preserved example of 18 th century country house. There is no intervisibility between the asset and the Site due to intervening development and vegetation. Furthermore, the Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development
15-33, Minstead Gardens, Numbers 2-26 with retaining Walls, 1-13 Minstead Gardens Listed buildings Grade II and Locally listed buildings	NHLE ref: 1246017, 1246045, 1246046; GLHER ref: 133809, 141038	Several mid-20th century blocks of staggered terraces initially built for old-age pensioners. They represent mixed development low-cost houses built to suit the needs of the Alton community. They also form a strong group to the east of the 18th century Mount Clare building, preserving the Landscaping to Alton West Estate RPG character and setting.	The assets retain historical illustrative and communal values, as example of modernist low-cost houses built within an 18 th century landscape park. There is no intervisibility between the assets and the Site due to intervening development and vegetation. Furthermore, the Site does not contribute to the significance of the assets.	Out Its significance will not be affected by the proposed development
Dunbridge House, Charcot House, Denmead House Listed buildings Grade II*	NHLE ref: 1246042, 1246043, 1246044	Three mid-20th century brutalist style blocks of maisonettes. Reinforced concrete in-situ frame of board-marked concrete now painted, with storey-height prefabricated concrete panels with Dorset shingle and Derbyshire spar exposed aggregate and flat roof.	The assets retain historical illustrative, communal and aesthetic values, as good examples of brutalist style residential blocks. There is scarce intervisibility between the assets and the Site due to intervening development and vegetation. Furthermore, the Site does	Out Its significance will not be affected by the proposed development

Heritage Asset	Entry Number	Description	Significance and reasoning	Assessment inclusion/exclusion
		The proportions are based on his 'Modulor' and the Fibonacci number sequence. The expression of each maisonette as an individual element in the facade. The relationship of the blocks to each other and the landscape has been considered a 'majestic' piece of town planning.	not contribute to the significance of the assets.	
The bull at foot of Downshire Field Alton Estate Listed building G II*	NHLE ref: 1376742	1961 bronze shaggy expressionistic decorative sculpture of a bull, cast by Robert Clatworthy and located in the garden to the north of Danebury Avenue as a part of Tangleby grove estate.	The significance of the asset lies in the visual connection with the park surrounding it, in which it can be appreciated. There is no intervisibility between the asset and the Site due to intervening development and vegetation. Furthermore, the Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development
Danebury School & Alton Education Centre(Former) (Post Medieval Pond)	GLHER ref: 151783	Late post-medieval period land drain and a large feature, possibly a pond or water channel unearthed during archaeological investigations.	The asset retains primarily an evidential value. The Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development
Roehampton Village (Medieval Village)	GLHER ref: 116393	Medieval village location	The asset retains primarily an evidential value.	Roehampton Village (Medieval Village)
Ibstock Place School Locally Listed	GLHER ref: 123423	Late 19 th early 20 th century two-storey school and one storey lodge built in Georgian style and designed with contrasting London stock red and yellow brick. Later redevelopment	The asset retains primarily an evidential value. The Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development
Palewell Common	GLHER ref: 143840	Palewell Common is a remnant of the common lands that existed before Richmond Park was enclosed. The Common is now separated from Richmond Park by a brick wall. Within the park are tennis courts, playing fields and woodland.	The asset retains primarily evidential and historical illustrative value. The Site connects to the asset as previously likely part as Richmond Park to the large common. However, the intervisibility is scarce due to intervening developments, walls and vegetation.	Out Its significance will not be affected by the proposed development

Heritage Asset	Entry Number	Description	Significance and reasoning	Assessment inclusion/exclusion
			Therefore, the Site is not considered to affect the asset's significance.	
Clearance Lodge Locally listed		19 th century single storey brick lodge located within the RPG Grove House.	The asset retains primarily a historical illustrative value, as a well preserved 19 th century lodge serve the landscape park Grove House. There is no intervisibility between the asset and the Site due to intervening development and vegetation. Furthermore, the Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development
Danebury School & Alton Education Centre(Former) (Post Medieval Pond)	GLHER ref: 151783	Late post-medieval period land drain and a large feature, possibly a pond or water channel unearthed during archaeological investigations.	The asset retains primarily an evidential value. The Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development
Roehampton Village (Medieval Village)	GLHER ref: 116393	Medieval village location	The asset retains primarily an evidential value. The Site does not contribute to the significance of the asset.	Out Its significance will not be affected by the proposed development
Roehampton Lodge	-	20 th century brick lodge located at the entrance of the park, to the north of the Site.	The asset retains historical illustrative value The significance is fully described in Chapter 3 .	In Depending on the appearance of the proposed development, the Site might distract from the appreciation and understanding of the asset.

Section 2

D.2 The exclusion of the following assets from the assessment is consequent to the observation of their significance carried out during a site visit.

Landscaping to Alton West Estate Registered Park and Garden

D.3 The Landscaping to Alton West Estate Registered Park and Garden (grade II listed; NHE ref: 1466474) shares a very limited intervisibility with the Site, due to intervening buildings and vegetation. Furthermore, the 18th century parkland elements are appreciable within the asset. The brutalist buildings were placed considering buildings (Mount Clare grade I listed; NHLE ref: 1184436), views, approaches and tree's location of the original Capability Brown's design elements. At the same time, they contribute to make the park a secluded location screened from the external developments and parks (Richmond Park and Grove House NHLE ref: 1000419).

Figure D.2 Monte Clare listed building within the Landscaping to Alton West Estate Registered Park and Garden



View from the south of the registered park and garden looking north

The Alton Conservation Area

D.4 The Alton Conservation Area groups elements of the 18th century smart weekend villa (Mount Clare, grade I listed; NHLE ref: 1065545) and post-war low-cost housings (bungalow terraces – grade II listed; NHLE ref: 1246017, 1246045, 1246046 – and maisonettes blocks – Grade II* listed; NHLE ref: 1246017, 1246045, 1246046). The two building groups – despite different dates, style and character and thanks to the 20th century design – interact harmoniously, preserving the setting of the previous 18th century landscape and enhancing historic layout and the architectural quality of buildings.

Figure D.3 Brutalist blocks from the centre of the Alton Conservation Area



Photo taken from the south of the asset looking north

Exclusion

D.5 The historic illustrative value of the registered park and garden and the appearance and character of the Conservation Area are not considered to be affected by the proposed development as the Site does not contribute to their significance. Part of the registered park and garden significance lied in the location of the asset near Richmond Park and in its visual relationship. However, this view is currently limited by intervening vegetation and developments.

D.6 Therefore, the proposed development location and appearance will not further affect this element of the asset's significance.

Non-designated heritage assets

D.7 The following locally listed assets are located within the inner study area:

- Ibstock Place School, Clarence Lane, London, Greater London, SW15 5PY (Locally listed);
- 67-78, 80-86 Minstead Gardens, London, Greater London, SW15 4EW (Locally listed);
- Clarence Lodge, Clarence Lane, London, Wandsworth, SW15 5JW (19th century locally listed building);
- Maryfield Convent, Mount Angelus Road, London, Greater London, SW15 4JA

D.8 These assets represent late post-medieval early 20th century gentry residential buildings and modernist/brutalist buildings. The first group was later converted into institutional buildings (convent and schools); whereas the bungalows appeared to have preserved their original residence purpose.

D.9 No other non-designated heritage assets have been assessed as potentially affected by the proposed development.

Exclusion

D.10 The Site does not contribute to the significance of the locally listed assets. Furthermore, there is no intervisibility between the locally listed assets and the Site due to intervening vegetation and development.