

**Ham Polo Club,
Twickenham**

**Archaeology Desk-
Based Assessment &
Heritage Statement**

Client: HAM POLO CLUB LTD

AB Heritage Project No: 63283

Date: 11/09/2024

GLHER Data Licence Number: 18691

Ham Polo Club, Twickenham

Archaeology Desk-Based Assessment & Heritage Statement

Client	HAM POLO CLUB LTD
Project Number	63283
Prepared By	Leanne Tindle
Illustrated By	Pighill Illustrations
Approved By	Elli Winterburn
GLHER Data Licence Number	18691

Rev Number	Description	Undertaken	Approved	Date
1.0	Final	LT	EW	11/09/2024

This document has been prepared in accordance with AB Heritage standard operating procedures. It remains confidential and the copyright of AB Heritage Limited. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited

Enquiries To:

AB Heritage Limited, North Office (Head Office)

102 Beach Road, South Shields

Tyne and Wear, NE33 2NE

Email: info@abheritage.co.uk

Tel: 03333 440 206



CONTENTS

1.	Introduction.....	6
1.1	Project Background	6
1.2	Site Location & Description.....	6
1.3	Geology & Topography	6
1.4	Overview of Proposed Development	7
1.5	Planning Background.....	7
1.6	Consultation.....	7
1.7	Project Qualifiers	7
2.	Aims & Methodology	9
2.1	Aims of Report.....	9
2.2	Methodology	9
3.	Planning & Legislative framework	14
3.1	Archaeological & Heritage Legislation	14
3.2	National Planning Policy Framework 2023	14
3.3	Local Planning Policy.....	15
4.	Archaeological & Historic Background	17
4.1	Previous Works in the Study Area	17
4.2	Archaeology & History Background	17
5.	Site Visit	20
6.	Known & Potential Archaeological Resource	23
6.1	Known Archaeological Resource	23
6.2	Past Impact Within the Site Boundary	23
6.3	Potential Archaeological Resource.....	23
7.	Heritage: Statement of Significance	24
7.1	Focus of Study.....	24
7.2	Ham House Conservation Area	24
8.	Combined Impact Assessment.....	26
8.1	Assessment of Change.....	26
8.2	Impact Assessment	26
9.	Recommendations & Conclusions.....	27
9.1	Outline Recommendations	27
9.2	Conclusion.....	27
10.	References.....	29

FIGURES

- Figure 1: Site Location Map
Figure 2: Cultural Heritage Features Map
Figure 3: Proposed Sand Arena Plan and Details

TABLES

- Table 1: Examination of Appropriate Sources
Table 2: Assessing the Significance of an Archaeological Receptor

PLATES

- Plate 1. Aerial Photograph of the Proposed Development Site (Google Earth, 2024)
Plate 2. John Roque's Map of 1746 (Layers of London, 2024)
Plate 3. 25-Inch OS Map of 1897 (National Library of Scotland, 2024)
Plate 4. 25-Inch OS Map of 1933 (National Library of Scotland, 2024)
Plate 5. View of the proposal site, looking north
Plate 6. View of the proposal site, looking south east
Plate 7. View from the west boundary of the proposal site looking west towards Ham House & Gardens
Plate 8. View from the Melancholy Walk eastwards towards the site

APPENDICES

- Appendix 1: Cultural Heritage Features Gazetteer

EXECUTIVE SUMMARY

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

The proposed development is for the creation of a sand arena (Figure 3). The foundations will be concrete and reach a depth of c. 1m below current ground level. The arena will be enclosed by a timber fence c. 1.5m tall.

This report has charted the historic development of the site and surrounding area where there is evidence to suggest activity along the River Thames since the Prehistoric period. In the Medieval period there was a nearby settlement at Petersham to the east of the site and later in the Post Medieval period Ham House was constructed alongside a designed landscape and gardens to the west and south of the site. Historic mapping suggests the site has remained undeveloped since at least the 18th century. It now forms part of Ham Polo Club.

Due to the quantity of Prehistoric findspots throughout the study area, the fact the site has not been subject to any known previous groundworks, and its proximity to the Thames foreshore, there is considered to be a Low – Medium potential for encountering archaeological remains of the Prehistoric period within the site boundary. If Prehistoric finds or features were encountered within the site boundary depending on their nature and age, they could range anywhere between Low to High Significance.

Based on the site visit and historic research, this report concluded that Ham House Conservation Area was the only heritage asset susceptible to impacts arising from the proposed development. In turn, the Ham House Conservation Area was assessed to be of Very High Heritage Significance. Other built heritage assets in the study area including Ham House & Gardens, Douglas House and the German School were carefully considered and concluded to not be susceptible to impacts due to distance, intervening development and substantial tree screening.

In relation to archaeology, the Impact Assessment concluded that the impacts to the potential archaeological resource would be Low due to the targeted nature of the groundworks. This report recommends further archaeological work to determine if archaeological deposits are present on the site. Until the date, condition and state of preservation of any deposits is known, it is not able to assess the harm, in line with the NPPF.

The Impact Assessment concerning built heritage concluded that despite the proposed development altering a small part of the Ham Polo Club from part playing field and an enclosed area for horses, to a sand arena, this would not alter the character of the site as a sports and leisure facility adjacent to the modern Club buildings and stables. There was concluded to be No Harm to Ham House Conservation Area, in line with local and national planning policy.

An archaeological evaluation of the proposal site is recommended to establish the presence of buried deposits within the redline boundary that could be disturbed during groundworks. This would establish the condition, state of preservation and age of the potential

archaeological resource. This could be attached as a post-determination condition if the proposed development scheme is approved.

All recommendations are subject to the approval of the Local Planning Authority.

1. INTRODUCTION

1.1 Project Background

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

1.1.2 This report includes a description of the baseline conditions, from an examination of readily available sources on the history of the site, identifying any known and potential heritage receptors subject to potential impact. It proposes a suitable mitigation strategy, where such works are deemed appropriate.

1.2 Site Location & Description

1.2.1 The proposed development site is located within Ham Polo Club, Petersham Road, Twickenham, Richmond, London, TW10 7AH. The site is situated at the eastern side of the upper polo field and comprises part of the field and part of the grazing area for horses. The proposal site occupies an area of c. 1 hectares and is centred on National Grid Reference (NGR): TQ 17628 73283 (Figure 1; Plate 1).



Plate 1. Aerial Photograph of the Proposed Development Site (Google Earth, 2024)

1.2.2 The site is located within the Ham House Conservation Area [AB 28] and the Tier 3 Archaeological Priority Area: Petersham Meadows and Richmond Hill [AB 33].

1.3 Geology & Topography

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

deposits of clay and silt of the Langley Silt Member formed up to 2 million years ago (British Geological Survey, 2024).

- 1.3.2 The site lies at c. 6m above Ordnance Datum (aOD) on land which occupies a gradual northwards slope towards the River Thames.

1.4 Overview of Proposed Development

- 1.4.1 The proposed development is for the creation of a sand arena (Figure 3). The foundations will be concrete and reach a depth of c. 1m below current ground level. The arena will be enclosed by a timber fence c. 1.5m tall.

1.5 Planning Background

- 1.5.1 In February 2023, the client received a planning refusal for the extension of an existing sand arena at the western end of Ham Polo Club (Ref: 21/2454/FUL). An appeal was subsequently refused on the 3rd of May 2024 (Ref: APP/L5810/W/23/3327811). Both reasons for refusal were partly on heritage grounds and pertaining to perceived harm of the development to the Grade II* Registered Park and Garden [AB 19] and the Ham House Conservation Area [AB 28] partially by way of its siting.
- 1.5.2 Following the planning and appeal refusals, the client has carefully reconsidered the location of the proposed sand arena which is now proposed at the east side of the Polo Club c. 300m east of the Grade I Listed Ham House and Grade II* Registered Gardens [AB 16 & 19]. The new location is now at an imperceptible distance from both heritage assets, as well as being well screened from other heritage assets such as Douglas House and the German School [AB 26 & 27].

1.6 Consultation

- 1.6.1 On the 4th of September 2024, Leanne Tindle (Senior Heritage Consultant, AB Heritage) contacted Mr Mark Stevenson (Archaeological Advisor, Greater London Archaeological Advisory Service) via email. The purpose of the consultation was to inform Mr Stevenson of the production of the report and provide justification for our recommendation for further archaeological work. Miss Tindle invited comment on the assessment and recommendation. At the time of writing, no response had been received.
- 1.6.2 On the 5th of September 2024, Leanne Tindle (Senior Heritage Consultant, AB Heritage) contacted Ms Lauren Way (Conservation and Urban Design Officer, London Borough of Richmond and Wandsworth Council) via email in order to inform her of the production of the report, as well as to outline the scope of the assessment. Ms Way was invited to provide any additional information that should be considered as part of the assessment. At the time of writing, no response had been received.

1.7 Project Qualifiers

- 1.7.1 This report has been prepared under instruction and solely for the use of Ham Polo Club Ltd, and any associated parties they elect to share this information with.
- 1.7.2 Measurements and distances in this report are approximations only and should not be used for detailed design purposes.

- 1.7.3 All work undertaken is based upon the professional knowledge of AB Heritage and relevant standards, technology and legislation at the time of writing. Changes in these areas may occur in the future, causing changes to the conclusions, recommendations or advice given. AB Heritage is not responsible for advising any parties on the implications of such changes.
- 1.7.4 This report utilises information obtained from third party sources. AB Heritage takes no responsibility for the accuracy of such information.
- 1.7.5 Where recommendations are provided these need to be approved by the Local Planning Authority and do not themselves comprise mitigation of impacts.

2. AIMS & METHODOLOGY

2.1 Aims of Report

2.1.1 Early assessment of the implications of proposed development on the heritage resource is key to informing reasonable planning decisions. Indeed, NPPF 200 requires local planning authorities to request descriptions on the significance of any heritage assets affected by a proposal, including any contribution made by their setting. This states that:

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

2.1.2 This assessment therefore has the following objectives:

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

2.2 Methodology

Study Area

2.2.1 Based on advice available on the Greater London Historic Environment Record website and initial research of the site and surrounding area, a study area of 500m was deemed sufficient to capture the known archaeological resource in the surrounding area of the site to inform the assessment of this report. The study area also captured the built heritage assets in proximity to the site that had the potential to be affected by the proposed development.

Standards & Guidance Used

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

- *Standard and Guidance for Historic Environment Desk-Based Assessment* (ClfA, 2020).
- *Conservation Principles, Policies & Guidance for the Sustainable Management of the Historic Environment* (Historic England, 2008).
- *Understanding Historic Buildings* (Historic England, 2016).
- *The Setting of Heritage Assets* (Historic England, 2017).
- *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (Historic England, 2019).

Selection and Assessment of Sources

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

Table 1: Examination of Appropriate Sources

SOURCE	TYPE OF EVIDENCE	CONSULTED	COMMENT
Greater London Historic Environment Record	The primary source of information concerning the current state of archaeological, heritage and architectural knowledge in this area. Contains published and unpublished archaeological and historical sources, including any previous investigations undertaken within the study area.	02/09/2024	GLHER Data Licence Number: 15957. The HER data was supplemented by the collation of data from other sources detailed below.
Site Walkover	This task allows for development of a greater understanding of the on-site heritage resource, or any historic issues of the site, including information the general condition and setting of the area of proposed development and the site in which it stands.	28/08/2024	A site visit was undertaken by Leanne Tindle (Senior Heritage Consultant, AB Heritage) on the 28 th of September 2024.
National Heritage List for England (NHLE)	Information on statutory and non-statutory designated sites, including Listed Buildings and Scheduled Monuments.	27/08/2024	The NHLE was consulted for information relating to the Listed Buildings in proximity to the site including Ham House & Garden, Douglas House and the German School.
Richmond Local Studies Library and Archive	Readily accessible information on the site's history from readily available historic documentary sources, maps and photographs.	27/08/2024	The online catalogue for Richmond Local Studies Library and Archive was consulted and did not contain any extra information pertinent to this report.
Archaeology Data Service	The ADS is a digital repository for heritage records that supports the long-term digital preservation of such data to support future research, learning and teaching.	27/08/2024	
Heritage Gateway	An extensive database allowing for cross-search of over 60 resources on England's local and national historic sites, buildings and archaeology, including images of listed buildings.	27/08/2024	

SOURCE	TYPE OF EVIDENCE	CONSULTED	COMMENT
Local Historic Societies	Using the British Association for Local History (https://www.balh.org.uk/) list of local societies, checks were made with relevant organisations where there was a specific and obvious benefit to consulting local expertise on the history of the proposed development site.	03/09/2024	Richmond Local History Society have a website which details some publications and past talks. A brief history of Ham House was consulted as part of the background research to this report.

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

Assessment of Archaeological Potential

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

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

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

Assessment of Archaeological Significance

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

Table 2: Assessing the Significance of an Archaeological Receptor

SCALE OF ARCHAEOLOGICAL SIGNIFICANCE	
VERY HIGH	The highest status of site, e.g., Scheduled Monuments (or non-designated assets of schedulable quality and importance), or other designated / non-designated assets that can be shown to have exceptional qualities in their fabric or historical associations. Receptors of known or likely clear national importance, including extremely well-preserved historic landscapes, whether inscribed or not, with exceptional coherence, time depth, or other critical factors.
HIGH	Other designated / non-designated archaeological sites or assets with strong and coherent survival of key factors, such as extent / condition / context associations, providing clear evidence of occupation / settlement, ritual, industrial activity, etc. Examples may include archaeological remains that contribute significantly to research priorities, burial sites, deserted medieval villages, Roman roads, dense finds scatters, etc.
MEDIUM	Evidence of human activity that retains clear archaeological value, albeit with lesser coherence and / or merit than listed above. Such features will have the potential to contribute to research objectives and may include more ephemeral and / or degraded settlement activity to that listed above, defined historic field systems, finds scatters more dispersed in nature, or deposits with the potential for the recovery of meaningful environmental data..
LOW	Assets with very little or no surviving archaeological interest. Examples include destroyed antiquities, structures of almost no architectural / historic merit, buildings of an intrusive character or relatively modern / common landscape features such as quarries, drains and ponds etc.
UNCERTAIN	Insufficient information exists to assess the importance of a feature (e.g. unidentified features on aerial photographs).

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

Assessment of Heritage Significance

2.2.9 Assessment of heritage significance is judged on various factors, including existing designation(s) and the perceived heritage interests or values of a feature and / or its setting in-line with criteria set out by English Heritage in '*Conservation Principles, Policies & Guidance for the Sustainable Management of the Historic Environment*' (2008) and Historic England's '*Advice Note 12*' (2019).

2.2.10 As a result, this report will assess significance against **Archaeological, Architectural, Artistic, Historic** and **Setting** interests. Each relevant category discussed will result in an overall level of significance being defined for the feature, in accordance with a five-point scale comprising Very High, High, Medium, Low and Uncertain.

Combined Impact Assessment

2.2.11 The degree of impact upon the heritage resource is determined based on professional judgement as to the level of effect from a proposed development on the baseline conditions of the site and the cultural heritage resource identified. The criteria for assessing the level of impact will be expressed against a five-point scale comprising Very High, High, Medium, Low and Uncertain.

2.2.12 Overall, the degree of change will be assessed in terms of NPPF (as harmful or beneficial) and, where appropriate, against relevant local planning policy.

3. PLANNING & LEGISLATIVE FRAMEWORK

3.1 Archaeological & Heritage Legislation

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

3.2 National Planning Policy Framework 2023

- 3.2.1 The NPPF sets out government policy on the historic environment, which covers all elements, whether designated or not, that are identified as 'having a degree of significance meriting consideration in planning decisions, because of its heritage interest'.
- 3.2.2 Paragraph 200 states that 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 required in the assessment should be 'proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.
- 3.2.3 Paragraph 207 explains that 'where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 3.2.4 Paragraph 208 advises that where a proposal involve less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In weighing applications that affect directly or indirectly non designated heritage assets, Paragraph 209 states that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

3.3 Local Planning Policy

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

Policy LP 3 – Designated Heritage Assets

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

1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.
2. Resist the demolition in whole, or in part, of listed building. Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II* and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset.
3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place.
4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.
5. Demolitions (in whole or in part), alterations, extensions, and any other modifications to listed buildings should be based on an accurate understanding of the significance of the heritage asset.
6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.
7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.
8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.

9. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.
- B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:
 1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;
 2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or
 3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.
 - C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.
 - D. Where there is evidence of intentional damage or deliberate neglect to a designated heritage asset, its current condition will not be taken into account in the decision-making process.
 - E. Outline planning applications will not be accepted in Conservation Areas. The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.

Policy LP 4 – Non-Designated Heritage Assets

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

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

Policy LP 7 – Archaeology

- 3.3.2 The Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found and refuse planning permission where proposals would adversely affect archaeological remains or their setting. Desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance.

4. ARCHAEOLOGICAL & HISTORIC BACKGROUND

4.1 Previous Works in the Study Area

- 4.1.1 There are no known, previous archaeological works recorded within the site boundary.
- 4.1.2 Within the study area there are 15 recorded archaeological events comprising six Watching Briefs, five Archaeology Desk-Based Assessments, two Geophysical Surveys and two programmes of Trial Trenching. Those closest and most pertinent to the site include:
- An Archaeology Desk-Based Assessment undertaken at the German School [AB 27] c. 35m south east of the site. The assessment concluded that there was a low potential for archaeological remains of all periods to be recovered within the boundary of the School grounds. This was concluded to be due to the likely truncation of any archaeological deposits during the construction of the School and associated Sports Hall.
 - A Watching Brief carried out c. 90m north west of the site along the Thames foreshore which revealed Medieval and Post Medieval timber structures, 18th - 19th century drains and reused lock gate timbers [AB 3 – 7].

4.2 Archaeology & History Background

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

- 4.2.1 As with many other water sources throughout the UK, the River Thames and its flood plains are well known to have been a source of resources and transportation throughout the Prehistoric period. This is well represented in the study area where Prehistoric find spots are recorded with a particular concentration along the foreshore of the Thames (See Figure 2). The closest Prehistoric findspots recorded in proximity to the site include a Mesolithic Axe recorded c. 100m north of the site. A Neolithic axe and two Bronze Age spearheads [AB 3 & 7] have been recorded c. 200m north east of the site, with another Neolithic axe [AB 2] recorded c. 200m south of the site.
- 4.2.2 There are no recorded Roman finds within the site or the study area. The nearest known Roman archaeology of any significance is to be found at Richmond c. 2km to the north east of the site and in Kingston upon Thames, c 3.5km to the south of the site.

The Medieval Period (AD 410 – AD 1536)

- 4.2.3 The villages of Ham and Petersham originate in the Saxon Period. The manor of Petersham was granted in the 7th century to the Abbey of St Peter in Chertsey and a church has stood on the site of St Peters Church since Saxon times. Petersham village was recorded in 1086, in the Domesday Book, as *Piterichesham* (London Borough of Richmond upon Thames, 2008). Petersham continued to develop into a small, nucleated settlement in the Medieval period [AB 9].

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

- 4.2.4 The Post Medieval period was a time of significant change within the area surrounding the site. Through the 17th and 18th centuries the villages of Ham and Petersham became fashionable as a rural retreat for wealthy aristocrats. It was during this period that in 1610 Ham House and gardens [AB 16 & 19] were constructed c. 300m west of the site for Sir Thomas Vavasour in 1610. Later in the 17th century Ham House [AB 16] and its estate passed to the Tollemache family with whom it remained until the mid-20th century.
- 4.2.5 John Roque's map of 1746 (Plate 2) shows the approximate location of the site in a field and overlapping the treelined walk radiating eastwards from Ham House [AB 16]. The village of Petersham is located to the east of the site and to the south east is the 17th century Douglas House [AB 26] with an adjoining garden and orchard.

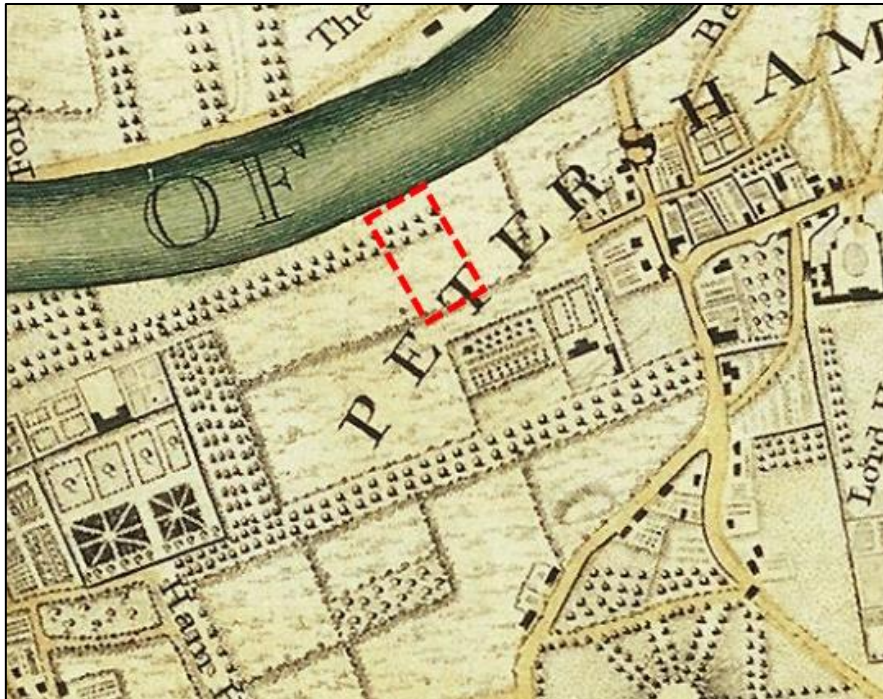


Plate 2. John Roque's Map of 1746 (Layers of London, 2024)

- 4.2.6 A survey along the Thames foreshore in 1996 revealed remains of a timber stair structure [AB 14] c. 90m north of the site. The structure is located c. 50m north of the site and there is no evidence of this structure on the map of 1746, it may predate the mid-18th century.
- 4.2.7 Plate 3 shows the proposal site and the surrounding area in 1897. The site is located in the centre of a field.



Plate 3. 25-Inch OS Map of 1897 (National Library of Scotland, 2024)

4.2.8 By 1933, the field in which the site was located had been turned into a sports ground (Plate 4). This may correspond with the establishment of Ham Common Polo Club in 1926 (Ham Polo Club, 2024).

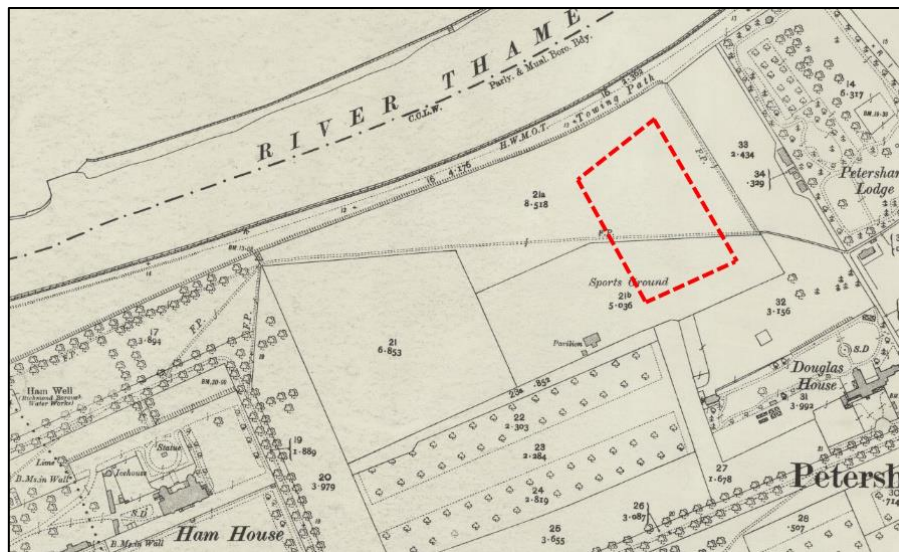


Plate 4. 25-Inch OS Map of 1933 (National Library of Scotland, 2024)

4.2.9 Since 1933, the proposal site has become incorporated into the northern polo pitch as well as land separated for the turning out of horses. It is located adjacent to the modern Club building to the south west and stabling to the south.

5. SITE VISIT

- 5.1.1 A site visit was undertaken by Leanne Tindle (Senior Heritage Consultant, AB Heritage) on the 28th of August 2024. The purpose of this visit was to gain a first-hand understanding of the existing land use and past impacts within the current site limits, along with an appreciation for the potential survival of archaeological deposits. The purpose of the site visit was also to understand the potential for built heritage assets in close proximity to the site to be affected by the proposed development.
- 5.1.2 The proposal site is located at the eastern end of the upper polo field within Ham Polo Club and c. 55m south of the River Thames foreshore. Plate 5 shows the view of the site from the southern redline boundary looking north towards the mature treeline along the south bank of the River Thames.
- 5.1.3 The site overlaps the eastern end of the field, part of the exercise track and a fenced off area to the east for turning out horses (Plate 5).



Plate 5. View of the proposal site, looking north

- 5.1.4 To the east and south of the site are stables and beyond this, large and mature trees which screen any views of the site from the Grade II* Douglas House [AB 26] located c. 200m south east of the site, as well as the Grade II Listed German School [AB 27] located c. 110m south east of the site.
- 5.1.5 As shown on Plate 6 both Douglas House [AB 26] and the German School [AB 27] are screened from site by mature trees.



Plate 6. View of the proposal site, looking south east

- 5.1.6 Located c. 300m of the site, beyond the polo field, is the Grade I Listed Ham House [AB 16] and Grade II* Registered Park and Garden [AB 19]. From the site, all that is visible of the heritage assets is a very obstructed view of the chimneys of the house rising just above the treelined walk known as Melancholy Walk (Plate 7).



Plate 7. View from the west boundary of the proposal site looking west towards Ham House & Gardens

- 5.1.7 The treelined walk along the western edge of Ham Polo Club (as shown in the distance on Plate 7) forms part of the Ham House Grade II* Registered Park and Garden [AB 19]. Plate 8 shows the obstructed view towards the site c. 300m east of Melancholy Walk. This photograph demonstrates that the site is barely perceivable from the Registered Park and Garden, as well as from Ham House [AB 16].



Plate 8. View from the Melancholy Walk eastwards towards the site

6. KNOWN & POTENTIAL ARCHAEOLOGICAL RESOURCE

6.1 Known Archaeological Resource

- 6.1.1 There is no known archaeological resource within the proposed development site.
- 6.1.2 Within the 500m study area, the predominant archaeological resource is Prehistoric findspots [AB 1 – 8], the Medieval settlement of Petersham [AB 9], and Post Medieval Ham House & Gardens [AB 19]. The settlement of Petersham and Ham House and Gardens have well-defined boundaries whereas the Prehistoric resource is dispersed throughout the study area with a particular prominence along the foreshore of the Thames.

6.2 Past Impact Within the Site Boundary

- 6.2.1 Aside from impacts associated with the laying of the exercise track (as shown on Plate 5 and Figure 3) as well as small, localised and shallow impacts associated with the installation of fences, there is no evidence that the site has been formerly developed or been subject to substantial groundworks.

6.3 Potential Archaeological Resource

- 6.3.1 The proposal site is located within the Tier 3 Archaeological Priority Area: Petersham Meadows and Richmond Hill [AB 33]. This covers the south side of the River Thames between Ham House and the undeveloped west-facing slope of Richmond Park and is designated due to the presence of undeveloped land with potential to yield information about the past, mainly from the Prehistoric period. Despite the potential impacts to the site amounting to c. 1m deep holes for the Arena, given the quantity of Prehistoric findspots throughout the study area, the site's proximity to the Thames foreshore and that the site has not been subject to any known groundworks, there is considered to be a Low – Medium potential for encountering archaeological remains of the Prehistoric period within the site boundary.
- 6.3.2 If Prehistoric finds or features were encountered within the site boundary depending on their nature and age, they could range anywhere between Low to High Significance.

7. HERITAGE: STATEMENT OF SIGNIFICANCE

7.1 Focus of Study

- 7.1.1 In accordance with English Heritage guidance *Conservation Principles, Policies & Guidance for the Sustainable Management of the Historic Environment* (2008), and Historic England's Advice Note 12 (2019), Heritage Assets derive their significance from a defined range of interests or values. These are **Archaeological**, **Architectural** or **Artistic**, **Historic** and **Setting** Interest. This report will assess those factors relevant to the overall understanding of the importance of the feature under consideration.
- 7.1.2 The site is in proximity to several heritage assets (see Fig. 1 & 2 and Appendix 1). However, based on the site visit and historic research, this report will focus on providing an understanding of the potential impacts to the Ham House Conservation Area [AB 28] only.
- 7.1.3 This has been concluded due to the information shared in Section 5 which demonstrates that due to intervening development, distance and substantial, mature tree screening, the site is currently and will continue to be imperceptible from nearby heritage assets including:
- Grade I Listed Ham House & Grade II* Registered Park & Garden [AB 16 & 19]
 - Grade II* Listed Douglas House [AB 26]
 - Grade II Listed German School [AB 27]
 - Petersham Conservation Area [AB 29]

7.2 Ham House Conservation Area

Description & General Condition

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

Assessment of Heritage Interest

Architectural & Artistic Interest

- 7.2.2 The architectural and artistic interest of the Ham House Conservation Area [AB 28] is largely rooted in the aesthetic quality of Ham House [AB 16] which is of an exceptionally high architectural value, with its designed ornamental gardens [AB 19] and associated features [AB 17 – 24]. The Conservation Area encompasses the 18th – 20th century development along Ham Street to the south including a number of fine 18th century buildings that add to the overall architectural and artistic interest of the area. The discreet areas of development within the Conservation Area are linked by carriage drives, footpaths and bridleways further reinforcing the impression of a designed landscape.

Historic Interest

- 7.2.3 The historic interest of Ham House Conservation Area is derived from its illustrative value with Ham House and Gardens being an example of a grand Jacobean country house set within an extensive designed landscape and gardens.

Archaeological Interest

- 7.2.4 The archaeological interest of Ham House Conservation Area is derived from its potential to yield information relating to the historic development of Ham House and Gardens that could enhance our current understanding of the heritage assets.
- 7.2.5 There are also a number of Prehistoric findspots [**AB 1 – 8**] within the Conservation Area . This would suggest there is a potential for further archaeological information to exist within the Conservation Area which affords a degree of archaeological interest to the area.

Setting

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

Overview of Significance

- 7.2.7 Based on the historic buildings particularly Ham House and Gardens which are of exceptional architectural and historic interest, the Conservation Area is considered to be of Very High Significance.

8. COMBINED IMPACT ASSESSMENT

8.1 Assessment of Change

Archaeology

- 8.1.1 The proposed development would involve the construction of a timber fence around the arena boundary, with a concrete base excavated down to c. 1m in depth. This has the potential to impact archaeological deposits in this area of the site. The impacts are considered to be Low due to the targeted nature of the works.

Heritage

- 8.1.2 The proposed development would change an existing part of the Ham Polo Club from part playing field and an enclosed area for horses, to a sand arena. This will not alter the character of the site as a sports and leisure facility adjacent to the modern Club buildings and stables.
- 8.1.3 There is considered to be No Impact the Ham House Conservation Area.

8.2 Impact Assessment

Archaeology

- 8.2.1 The impacts to the potential archaeological resource would be Low due to the targeted nature of the works. This report recommends further archaeological work to determine if archaeological deposit are present on the site. Until the date, condition and state of preservation of any deposits is known, it is not able to assess the harm, in line with the NPPF.

Heritage

- 8.2.2 This assessment concludes that there would be No Harm to the Ham House Conservation Area. The proposed scheme, therefore, is assessed to be compatible with national and local planning policy.

9. RECOMMENDATIONS & CONCLUSIONS

9.1 Outline Recommendations

Archaeology

- 9.1.1 An archaeological evaluation of the proposal site is recommended to establish the presence of buried deposits within the redline boundary that could be disturbed during groundworks. This would establish the condition, state of preservation and age of the potential archaeological resource. This could be attached as a post-determination condition if the proposed development scheme is approved.
- 9.1.2 All recommendations are subject to the approval of the Local Planning Authority.

Heritage

- 9.1.3 There are no recommendations to make in relation to built heritage.

9.2 Conclusion

- 9.2.1 AB Heritage Limited has been commissioned by Ham Polo Club Ltd to produce a Combined Archaeology Desk Based Assessment & Heritage Statement covering proposed works at Ham Polo Club, Twickenham. It was requested as part of forthcoming planning application.
- 9.2.2 The proposed development is for the creation of a sand arena (Figure 3). The foundations will be concrete and reach a depth of c. 1m below current ground level. The arena will be enclosed by a timber fence c. 1.5m tall.
- 9.2.3 This report has charted the historic development of the site and surrounding area where there is evidence to suggest activity along the River Thames since the Prehistoric period. In the Medieval period there was a nearby settlement at Petersham to the east of the site and later in the Post Medieval period Ham House was constructed alongside a designed landscape and gardens to the west and south of the site. Historic mapping suggests the site has remained undeveloped since at least the 18th century. It now forms part of Ham Polo Club.
- 9.2.4 Due to the quantity of Prehistoric findspots throughout the study area, the fact the site has not been subject to any known previous groundworks, and its proximity to the Thames foreshore, there is considered to be a Low – Medium potential for encountering archaeological remains of the Prehistoric period within the site boundary. If Prehistoric finds or features were encountered within the site boundary depending on their nature and age, they could range anywhere between Low to High Significance.
- 9.2.5 Based on the site visit and historic research, this report concluded that Ham House Conservation Area was the only heritage asset susceptible to impacts arising from the proposed development. In turn, the Ham House Conservation Area was assessed to be of Very High Heritage Significance. Other built heritage assets in the study area including Ham House & Gardens, Douglas House and the German School were carefully considered and concluded to not be susceptible to impacts due to distance, intervening development and substantial tree screening.

- 9.2.6 In relation to archaeology, the Impact Assessment concluded that the impacts to the potential archaeological resource would be Low due to the targeted nature of the groundworks. This report recommends further archaeological work to determine if archaeological deposit are present on the site. Until the date, condition and state of preservation of any deposits is known, it is not able to assess the harm, in line with the NPPF.
- 9.2.7 The Impact Assessment concerning built heritage concluded that despite the proposed development altering a small part of the Ham Polo Club from part playing field and an enclosed area for horses, to a sand arena, this would not alter the character of the site as a sports and leisure facility adjacent to the modern Club buildings and stables. There was concluded to be No Harm to Ham House Conservation Area, in line with local and national planning policy.
- 9.2.8 An archaeological evaluation of the proposal site is recommended to establish the presence of buried deposits within the redline boundary that could be disturbed during groundworks. This would establish the condition, state of preservation and age of the potential archaeological resource. This could be attached as a post-determination condition if the proposed development scheme is approved.
- 9.2.9 All recommendations are subject to the approval of the Local Planning Authority.

10. REFERENCES

Cartographic Sources

- National Library of Scotland Maps, 2024. <https://maps.nls.uk/>
- Layers of London, 2024. <https://www.layersoflondon.org/>

Documentation & Online Sources

- AB Heritage, 2020. Ham Polo Club Ball Stop Fence, Twickenham, Combined Archaeology Desk Based Assessment & Heritage Statement.
- AB Heritage, 2021. Ham Polo Club San Arena, Twickenham , Combined Archaeology Desk Based Assessment & Heritage Statement.
- Ancient Monuments and Archaeological Areas Act 1979.
<http://www.legislation.gov.uk/ukpga/1979/46/contents>
- Archaeology Data Service, 2024. <https://archaeologydataservice.ac.uk/>
- Chartered Institute for Archaeologists, 2020. Standard and Guidance for Historic Environment Desk-Based Assessment.
https://www.archaeologists.net/sites/default/files/CIfAS%26GDBA_4.pdf
- Chartered Institute for Archaeologists, 2020. Standard and Guidance for the Archaeological Investigation and Recording of Standing Buildings and Structures.
https://www.archaeologists.net/sites/default/files/CIfAS%26GBuildings_3.pdf
- Heritage Gateway, 2024. <http://www.heritagegateway.org.uk/Gateway/>
- Historic England, 2008. Conservation Principles, Policies & Guidance.
<https://content.historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/conservationprinciplespoliciesguidanceapr08web.pdf/>.
- Historic England, 2015, Photographing Historic Buildings Notes 2015
- Historic England, 2016. Understanding Historic Buildings, A Guide to Good Recording Practice. <https://content.historicengland.org.uk/images-books/publications/understanding-historic-buildings/heag099-understanding-historic-buildings.pdf/>
- Historic England, 2017. The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3. <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>
- Historic England, 2019. Statements of Heritage Significance: Analysing Significance in Heritage Assets. Historic England Advice Note 12. <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/>
- Historic England, 2024. National Heritage List for England.
<https://historicengland.org.uk/listing/the-list/>

- London Borough of Richmond upon Thames Council, 2007. Ham House Conservation Area Character Appraisal & Management Plan. https://www.richmond.gov.uk/media/4068/ca_studies_6_7_23_67.pdf
- London Borough of Richmond upon Thames Council, 2021. Pre-application Advice issued to the client REF: 21/P0009/PREAPP.
- Ministry of Housing, Communities & Local Government, 2023. National Planning Policy Framework. <https://www.gov.uk/guidance/national-planning-policy-framework>
- Natural England, 2024. Multi-Agency Geographic Information for the Countryside (MAGIC) map application. <https://magic.defra.gov.uk/MagicMap.aspx>
- Planning (Listed Buildings and Conservation Areas) Act 1990. http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf
- Richmond Local History Society, 2024. Talk by Gordon Elsdon on the Royal Manor House of Ham. <https://www.richmondhistory.org.uk/wordpress/events/gordon-elsden-manor-house-of-ham/>

Correspondence

- On the 4th of September 2024, Leanne Tindle (Senior Heritage Consultant, AB Heritage) contacted Mr Mark Stevenson (Archaeological Advisor, Greater London Archaeological Advisory Service) via email.
- On the 5th of September 2024, Leanne Tindle (Senior Heritage Consultant, AB Heritage) contacted Ms Lauren Way (Conservation and Urban Design Officer, London Borough of Richmond and Wandsworth Council) via email.

Appendices

Appendix 1 Cultural Heritage Features Gazetteer

This gazetteer incorporates relevant archaeological, heritage and historic environment assets identified during a search of sources listed in Table 1 within 500m of the site.

Abbreviations

GI LB – Grade I Listed Building

GII LB – Grade II Listed Building

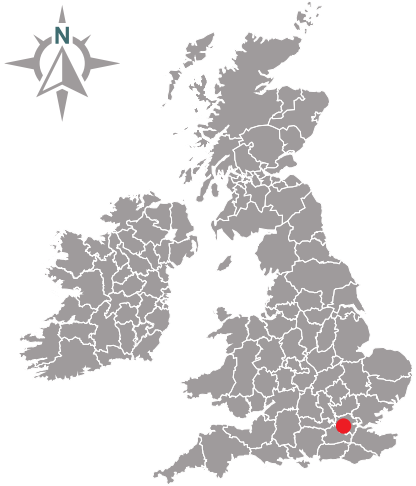
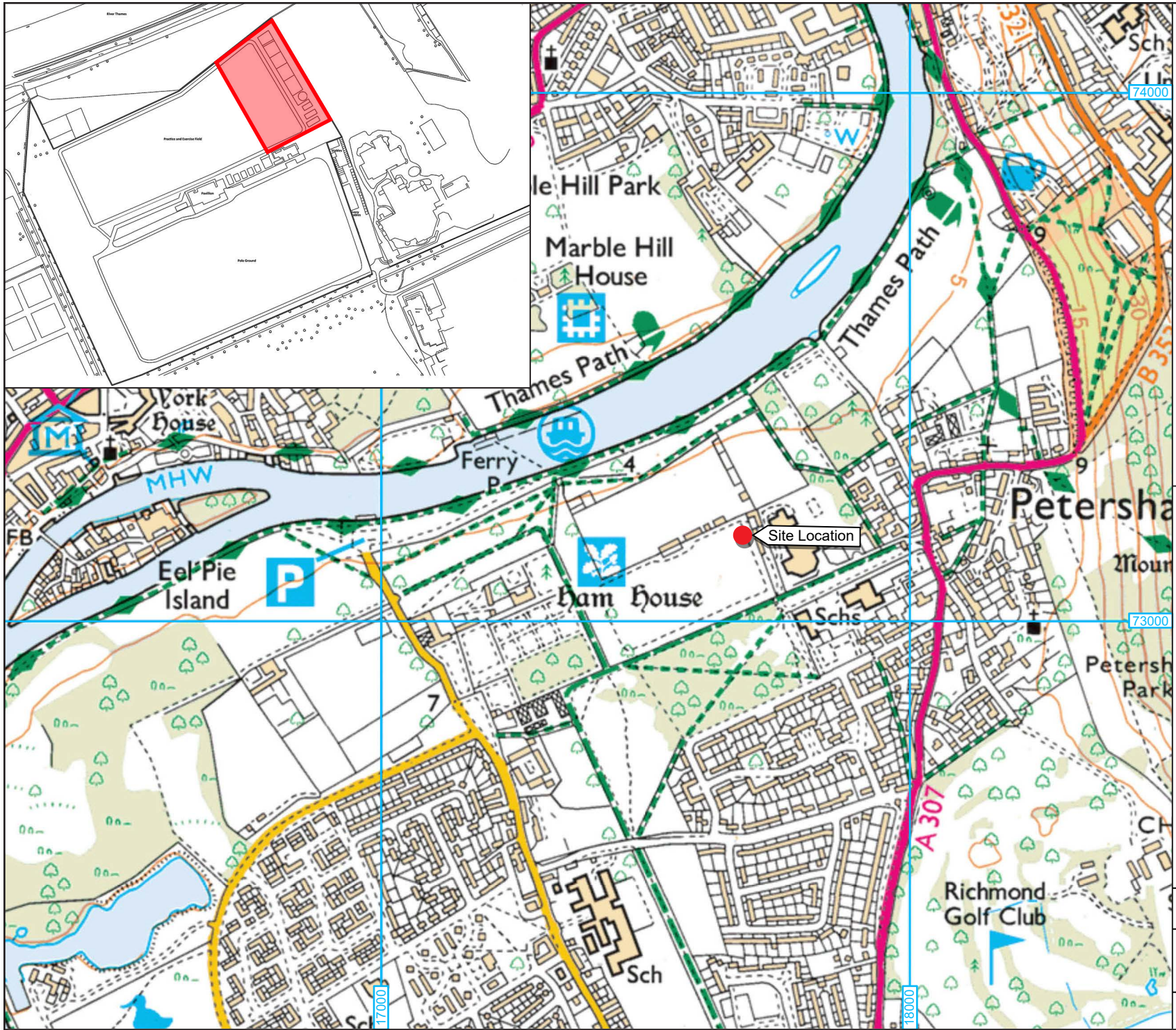
SM – Scheduled Monument

MLO: GLHER Monument Prefix and UID

AB No.	Period	Description	Status	NGR	Ref. No.
1	Prehistoric	Mesolithic tranchet axe or adze from the Thames river at Petersham	-	TQ 1750 7340	MLO180
2	Prehistoric	Neolithic Axe from Petersham Meadow	-	TQ 17704 73004	MLO190
3	Prehistoric	Findspot of a Neolithic Axe at River Lane		TQ 17704 73505	MLO3115
4	Prehistoric	Findspots of a Neolithic Axehead and Flint Flakes at Petersham		TQ 18005 73004	MLO23448 & MLO19008
5	Prehistoric	Prehistoric Layer recorded by Thames Foreshore survey		TQ 17784 73545	MLO69685
6	Prehistoric	Prehistoric Structure along the north side of the River Thames		TQ 17265 73364	MLO69678
7	Prehistoric	Findspot of Two Bronze Age Socketed Looped Spearheads recorded at Petersham Lane		TQ 17704 73505	MLO3116
8	Prehistoric	Bronze Age Findspot (socketed Looped Spearhead) at Glovers Island		TQ 17804 73605	MLO3122
9	Medieval	Petersham Road (Tudor Settlement)		TQ 18064 73305	MLO73268
10	Post Medieval	Timber Structure, Thames Foreshore survey, Marble Hill Park	-	TQ 1737 7341	MLO696
11	Post Medieval	Steps/structure, recorded by Thames Foreshore survey	-	TQ 1751 7348	MLO696 MLO696

AB No.	Period	Description	Status	NGR	Ref. No.
12	Post Medieval	Gate, recorded by Thames Foreshore Survey	-	TQ 1750 7349	MLO696
13	Post Medieval	Drain, recorded by Thames Foreshore Survey	-	TQ 1739 7343	MLO696
14	Post Medieval	Structure, recorded by Thames Foreshore survey	-	TQ 1759 7341	MLO697
15	Post Medieval	Statue 1775 AD – Forecourt of Ham House	GII LB	TQ 17245 73082	MLO91098 NHLE 1192685
16	Post Medieval	Ham House 1610 and 1672-1675. Important Jacobean Mansion	GI LB	TQ 17262 73046	MLO90902 NHLE 1080832
17	Post Medieval	Garden Wall and Gate piers to East of Ham House	GII LB	TQ 17355 73038	NHLE 1080833
18	Post Medieval	Entrance gates to Ham House with 17th century ironwork and railings	GII LB	TQ 17238 73102	MLO91648 NHLE 1358078
19	Post Medieval	17 th century Garden at Ham House	GII* RPG	TQ 1738 7253	MLO59328 NHLE 1000282
20	Post Medieval	Ham House – Ice House	GII LB	TQ 1719 7306	NHLE 1358079
21	Post Medieval	Service Yard Entrance to the west of Ham House	GII LB	TQ 1720 7301	NHLE 1358096
22	Post Medieval	Ham House Tea Room (Former Orangery)	GII LB	TQ 1715 7299	NHLE 1192746
23	Post Medieval	Ham House Stables	GII LB	TQ 1708 7301	NHLE 1080790
24	Post Medieval	Boundary Wall on the east side of Ham Street between Ham House Stables and The Manor House	GII LB	TQ 1709 7293	NHLE 1358098
25	Post Medieval	Marble Hill Park - The grounds of Marble Hill is the last complete survivor of the elegant 18th century villa and gardens along the river between Richmond and Hampton Court. Located c. 400m to the north west of the site	GII* RPG	TQ 17353 73671	MLO592 NHLE 1000400
26	Post Medieval	17 th Century Douglas House	GII* LB	TQ 17887 73162	MLO91436
27	Modern	The German School, Douglas House, 20th century secondary school building.	GII LB	TQ 1778 7312	MLO108716

AB No.	Period	Description	Status	NGR	Ref. No.
28	-	Ham House Conservation Area	CA	-	-
29	-	Petersham Conservation Area	CA	-	-
30	-	Ham APA	APA	-	-
31	-	Petersham APA	APA	-	-
32	-	Thames Foreshore APA	APA	-	-
33	-	Petersham Meadows and Richmond Hill APA	APA	-	-



KEY

- Site Location
- Site Boundary (inset)

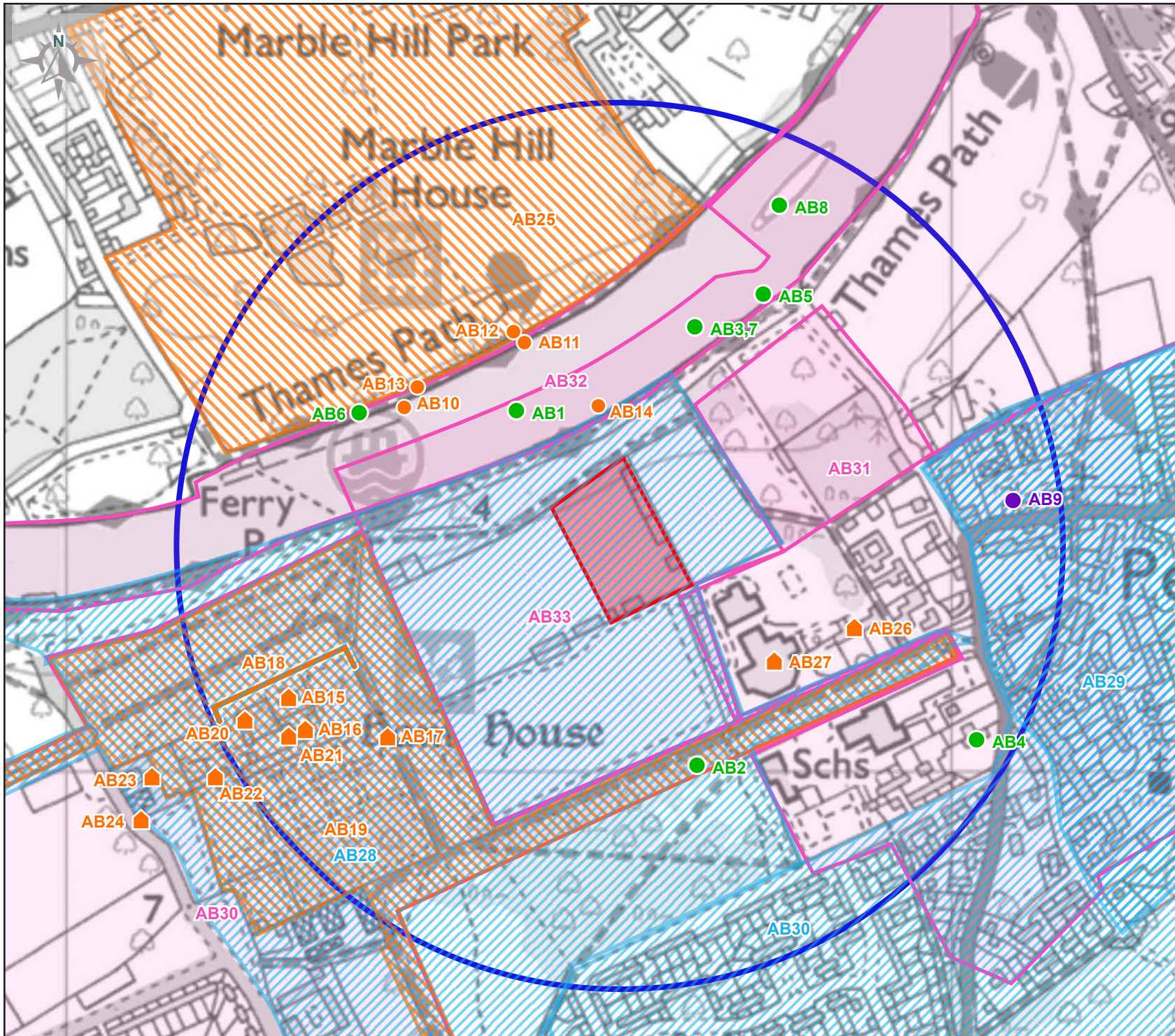
0 500m

1:10,000

Figure 1: Site Location

Project:
Ham Polo Club, Twickenham

Date: 05/09/24 Job No: 63283



KEY

- Site Boundary
- Search Area (500m)
- Listed Building
- Archaeological Features
- Registered Parks & Gardens
- Conservation Areas
- Archaeological Priority Areas

PERIOD

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

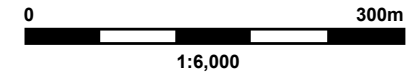


Figure 2: Cultural Heritage Features Map

Project:
Ham Polo Club, Twickenham

Date: 05/09/24 | Job No: 63283



AB Heritage Limited
North Office (Head Office)
102 Beach Road, South Shields
Tyne and Wear, NE33 2NE
Tel: 03333 440 206
e-mail: info@abheritage.co.uk