The Old School Park Lane, Richmond Heritage Statement

September 2014





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1.0 Introduction

The Old School is a Victorian school building erected in 1870, with notable extensions in the Edwardian and post-war periods. It is not a listed building, but it is recorded as a Building of Townscape Merit by the London Borough of Richmond, and it makes a positive contribution to the character and appearance of the Central Richmond Conservation area.

For over 40 years the Old School has been used as an office and warehouse, but it is now proposed to develop the building and its rear car park for housing, in part to fund the structural and other repairs to the principal historic elements. As part of these proposals, the Built Heritage Consultancy have been commissioned to assess the potential heritage interest of the school building, and its role in the wider conservation area, in order to evaluate the suitability of the scheme in terms of the relevant national and local authority heritage policies.

The Building Appraisal (August 2012) by Thames Valley Archaeological Services has already set out the general history of the site, and described the evolution and fabric of the building. This Heritage Statement draws upon that research but does not reproduce it in detail. Instead the present report concentrates on defining the heritage significance of the Old School, and assessing the proposed scheme.

The statement has been written by James Weeks, based on a site visit and desk-based research in July 2014. The interior of the building was inspected by Richard Sanders of Sanders Laing and further information has been obtained from the Building Appraisal report.

2.0 Understanding

2.1 The history of the school building

This section provides a brief summary of the history of the building. It draws upon the sources in the Building Appraisal by Thames Valley Archaeological Services, which provides a fuller treatment including historic maps, plans, and photographs.

The first part of the present Old School was erected in 1870, on the site of gardens or fields that had previously stood behind the houses along Parkshot. The building apparently housed St Elizabeth's, a school set up by French Catholic émigrés who fled the Revolution in 1796, and had settled in Richmond. The original building comprised the range along the Park Lane frontage, consisting of a school room to the west (with a further class room behind it to the north) and a master's house to the east. Although contained within one building, the separate functional elements were expressed through different massing and elevational treatments: the school hall was a single storey with a tall pitched roof enlivened by hipped dormers; the rear class room had its own tall pitched roof; and the master's house had a bay window, two main storeys of brick and high pitched roofs above (as well as a single storey ancillary wing to the side and rear).

The original building was constructed of yellow stock brick with limestone dressings. It was built in a plain Gothic style commonly used in mid-Victorian institutional buildings, and particularly favoured by Catholic institutions.

Plans of 1894 show proposals for a large extension, which was carried out shortly afterwards. These included a large new hall to the north west, built in a plain version of the vernacular and Queen Anne style that was popularised by the London School Board from the 1870s onwards. Along the west side of this rear extension was a narrow and low ancillary range. Meanwhile to the north east a new series of WCs and ancillary rooms were built out from the main extension, projecting into the playground.

During the 1950s the rear WC extension was largely rebuilt and much extended with stock brick, flat roofed structures in a modern utilitarian architectural style. At the same time or later, the Building Appraisal records that the store room to the east of the master's house was rebuilt in stock brick. In addition, the larger school rooms were subdivided by brick partition walls to give smaller class rooms linked by corridors – though it is not known exactly when this was done and it may have occurred following the cessation of school use.

Permission was granted for a change of use to warehousing in 1973. Since then the building has been used partly as storage space and partly as associated offices. It has been occupied for a number of years by Richmond Film Services.



View from the south east, showing the master's house with its single storey ancillary wing to the right, and the dormer windows of the original school hall on the left.



View of the rear of the original master's house (left) and class room (centre), with the roof of the 1890s rear wing on the right, above the 1950s extension.



View from the north, showing the utilitarian 1950s extension which replaced the 1890s WC blocks. To the right is the upper part of the 1890s rear schoolroom extension.

2.2 The Conservation Area

Central Richmond Conservation Area covers the historic town centre, running north east from Hill Street to take in the buildings either side of George Street/The Quadrant/Kew Road and Red Lion Street/Paradise Road. The conservation area as originally designated in September 1969 covered only the area south of the railway line. However it was extended in July 1977 to take in the area to the north along Kew Road, Parkshot and Church Road - including The Old School. There have been four subsequent extensions, two of which took in the Magistrates Court north of the site (in January 2000) and the area south and west of the site including The Gateways and the terrace of modern houses opposite (November 2005).

The Conservation Area Appraisal explains that the core of the present conservation area was occupied by the historic village of Sheen during the medieval period. (The village became known as Richmond following Henry VII's renaming of Sheen Palace in honour of his Yorkshire dukedom.) The village prospered in the early centuries through its location by a river crossing and next to a major Tudor palace, but by the 18th century it was more notable as a country retreat for London businessmen and aristocrats. The medieval buildings were frequently replaced by Georgian houses during this time. In addition, suburban expansion was clearly occurring around the edges of the original village. Richardson's map of 1771 shows that there were already a number of houses along Parkshot, including Parkshot Cottage and the terrace of Nos. 3, 4, 5 and 6 Parkshot which still survive and are now listed buildings.

The advent of the railways in the 1840s led to the expansion of Richmond, and the redevelopment of much of the town centre with new commercial buildings. The 1866 Ordnance Survey shows several Victorian houses along Portland Terrace on the north east side of Richmond Green, while terraced housing was springing up along the main roads and new backstreets. Nevertheless, despite the physical impact of the railway cutting and station, and the considerable rebuilding that subsequently occurred, the historic street pattern of the centre remained largely intact, including the characteristic alleys running between the main streets and the Green. Parkshot similarly retained something of its character as a back lane as it did not become connected through to the Kew Road except by passageways.

As the Conservation Area Appraisal notes, the area is mainly a commercial shopping district, with a townscape that is 'noted for its variety, with a consistently high quality and many exuberant individual buildings. There are also residential areas of mainly terraced development.' The Appraisal goes on to note that while the 20th century commercial architecture frequently enhances the character of the conservation area, some modern office schemes do detract from the historic townscape – as at the west end of Paradise Road.

In addition to the predominant commercial character, the Appraisal does note the contribution of lesser lanes that lead into the historic centre, such as Brewer's Lane, Church Court and Market Passage. These are praised for providing 'a refuge from traffic' and offering 'spaces of a more intimate nature'. Meanwhile, Church Terrace and Parkshot are noted for containing 'important groups of early 18th century brick terraced houses providing a record of the scale and quality of detail previously seen throughout the area.'

The Appraisal sets out several 'Problems and Pressures' affecting the conservation of the area's special character. These include development pressure which would harm views, the skyline and landmarks; and the loss of traditional architectural features.

The Appraisal also notes a number of 'Opportunities for Enhancement'. One of these is the opportunity for future works to secure the preservation, enhancement and reinstatement of the conservation area's architectural quality and unity.

In summary, the character of the Central Richmond Conservation Area is very varied in terms of the materials, styles, uses and ages of the various buildings within it, and includes areas of markedly differing character. There are commercial high streets, narrow passages, areas of Victorian terraced housing and modern office and civic buildings. A number of historic frontages survive, and others have been rebuilt to follow the old building line, while some have been redeveloped in a more modern manner that has changed the townscape character in particular places. In addition, backland areas have been developed over time – either taken into expanded commercial premises or built over with offices, school buildings or car parks. Nevertheless, while there is great variety within the conservation area, these disparate elements are united by a largely surviving historic street pattern, and a generally similar scale of between 2 and 5 storeys.

2.3 The area around the site

The Old School site was previously fields or market gardens, as shown on Richardson's map of the Manor of Richmond from 1771, and the First Edition Ordnance Survey of 1866 (both of which are reproduced in the 2012 Building Appraisal, along with other OS maps). Parkshot, in contrast, had been developed with detached houses and short terraces since the early 18th century, and its western side was almost fully built up by 1771.

Despite the arrival of the railway in the 1840s, the site remained a backland garden area, accessed via a track passing by its north side, until both Park Lane and the school were created around 1870. At the time of the 1896 Ordnance Survey the Georgian houses along Parkshot were still in being, and the school was bordered to the east by the long garden of No. 1 Parkshot, and to the north east by a new chapel built on the gardens of 4 and 5 Parkshot. To the west was a detached house with a large church beyond. To the north were back gardens, with a long building housing Public Baths beyond them. Meanwhile the area on the south side of Park Lane was at that point largely undeveloped, aside from Parkshot Cottage.

The 1913 OS map shows little change apart from the demolition of the church at the west end of Park Lane, and the replacement of the Georgian houses north of 6 Parkshot with an institutional building ('Parkshot Rooms'). The remaining historic houses on the eastern side of Parkshot had also gone by this time, replaced with the rear portion of the large commercial premises opposite the train station. This left Parkshot Cottage and Nos. 1-6 as the only remaining Georgian houses on the street.

By the time of the 1959 OS the neighbourhood of the school had changed somewhat, with a short terrace of small dwellings built immediately to the east of the site, and a large flat development (The Gateways) to the west. At this point the north side of Park Lane has become fully developed, while the south side in contrast was still largely open land along the railway, with an access road leading west to what appears to have been a warehouse.

In recent decades there have been further changes to the character of the area immediately around the site. The long terrace of modern brick houses built along the south side of Park Lane was apparently erected in the 1980s. Meanwhile the Georgian dwellings at 1 and 2 Parkshot, together with their back gardens and most of the small 20th century dwellings east of the school, were demolished and replaced with a plain neo-Georgian office development of limited quality. This has 4 storeys along Parkshot and 3 storeys along Park Lane. Perhaps slightly earlier, the baths and institutional building north of 6 Parkshot were replaced with the concrete and blockwork Magistrates Court, a Brutalist building of two and three storeys with complex massing, which has now been painted white. It has a concrete wall to the main road, with a twolane access road to the rear car park on its south side. The east side of Parkshot north of the railway bridge has also been largely redeveloped with modern offices in recent decades, changing its character once again.

Today, the Old School site borders developments of very diverse ages, including the early 18th century houses along Parkshot; the post-war dwelling and offices adjacent to the east; the

modern houses to the south; the interwar flat development to the west; and the Brutalist Magistrates Court to the north. Interestingly, although the Magistrates Court is a large modern office and civic complex it is included within the conservation area – perhaps to enable future change to be guided in a way that is more sympathetic to the prevailing character. Meanwhile, the wider immediate area has seen considerable redevelopment over the last few decades, giving a great deal of variety which derives some shared character from the predominant (though not exclusive) use of brick and the maintenance of building heights between 2 and 4 storeys.

The Old School is relatively inconspicuous along Park Lane as it is partly screened by the trees in the front garden, and is lower than the buildings either side. This character is reinforced by the backward rake of the roof of the original school hall. These features set it apart from most of the buildings on the street which have predominantly hard and bluff frontages with darker brick and less varied massing.



View west along Park Lane, showing the flank wall of the modern office development at Nos. 1 & 2 Parkshot on the right, with the Old School visible in the centre behind its front garden with trees and shrubs.



View east along Park Lane, showing the interwar flats of The Gateways on the left, the Old School hidden behind trees in the centre, and the flank wall of the modern development at 1 & 2 Parkshot on the right.



View west along the south side of Park Lane opposite the Old School, showing the modern terrace housing.



View north from the Old School site, showing the Brutalist white-painted concrete Magistrates Court.



View east from the Old School site, showing the boundary wall and trees screening the the Georigan houses of 3-6 Parkshot (centre), and the taller modern office at 1 & 2 Parkshot on the right.



The listed early Georigan houses at 3, 4, 5 and 6 Parkshot. The modern office block at Nos. 1 & 2 can just be seen to the left, with the edge of the Magistrates Court on the right.

3.0 Significance

Introduction 3.1

The Old School is not listed, but it is recognised by the London Borough of Richmond as a Building of Townscape Merit and as a positive contributor to the character and appearance of the Central Richmond Conservation Area. In order to assess the potential impact of the proposed scheme upon the heritage interest of the site and the wider conservation area, it is necessary first to define in detail the significance of the building and of its role in the conservation area.

The following assessment of the building uses English Heritage's Conservation Principles (2008), which provides tools for understanding the significance of buildings and places in relation to the following values:

- Evidential (or archaeological) value the physical aspects of a building that yield evidence about its past.
- Historical value the extent to which the building is associated with or illustrative of historic events or people.
- Aesthetic (architectural / artistic) value includes the importance of buildings or places for their design, visual, landscape and architectural qualities.
- Communal value includes the importance of buildings or places to societies and communities, including for local identity.

The assessment of the conservation area and the Old School's role within it draws upon the methodology outlined in English Heritage's Understanding Place: Conservation Area Designation, Appraisal and Management (2011). This document provides guidance on the designation, appraisal and management of conservation areas, and is mostly intended as guidance to local authorities when designating conservation areas and producing conservation area appraisals and management plans. This document outlines a number of questions which English Heritage suggest should determine the interest of a potential heritage asset within a conservation area, and which are considered within the assessment below. These questions include:

- Is it the work of a particular architect or designer of regional or local note?
- Does it have landmark quality?
- Does it reflect a substantial number of other elements of the conservation area in age, style, materials, form or other characteristics?
- Does it relate to adjacent designated heritage assets in age, materials or any other historically significant way?
- Does it contribute positively to the setting of adjacent designated heritage assets?
- Does it contribute to the quality of recognisable spaces including exteriors or open spaces with a complex of public buildings?
- Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?
- Does it individually, or as part of a group, illustrate the development of the settlement in

which it stands?

- Does it have significant historic association with features such as the historic road layout, burgage plots, a town park or a landscape feature?
- Does it have historic associations with local people or past events?
- Does it reflect the traditional functional character or former uses in the area?
- Does its use contribute to the character or appearance of the area?

The significance of the Old School 3.2

Evidential value

The Desk-based Assessment (2012) identifies the local area as one of high archaeological potential, and suggests that mitigation of potential impacts upon sub-surface archaeology may be necessary, particularly in respect of works in the former playground. Nevertheless, before the development of the school, the site appears to have comprised fields or gardens which were outside the boundary of Sheen Manor and the grounds of the later royal palace, and were located some way from known roads.

In terms of the visible elements of the site, the oldest elements appear to be the 1870 school building and its boundary walls, but these and the later structures are likely to have very modest evidential value. The brick walls, roof structures and floors show a typical approach to construction of their time, and are not rare or distinctive. In fact, they contain mass-produced elements which still survive in great numbers within the local area and the wider country.

Historical value

The older parts of the school building have a moderate historical value, deriving from their role as a purpose-built home for St Elizabeth's Catholic School, which was set up by émigrés after the French Revolution. This historical value resides primarily in the external elevations and massing of the original 1870 building, most of all in the south elevation which largely retains its original architectural character although it is showing signs of decay.

The interiors of the older parts of the school building have a much reduced historical value, since they have been subdivided and have lost their original furniture and decorative treatment, as well as most of their fixtures and fittings, so that their original character is no longer readily appreciable.

The loss of the original and 1890s ancillary structures, and the conversion of the playground to a car park, has meant that the site does not possess as much historical value as it would have done were it a largely intact Victorian school.

Aesthetic value

The mid-Victorian plain stock brick Gothic style of the Old School is competently composed and executed, in a way that was common to various institutional buildings during this period. This kind of architecture relied upon the use of simple materials and mouldings to give the effect of an honest building that evoked the religious piety of the medieval period. The design of the Old School is not particularly innovative for its date, and could have been made at any time over the preceding 20 years. Indeed it was built in the same year as the London School Board was set up, setting in motion a programme of school-building that gave rise to much more practical and well-lit school buildings. In the wider context of Victorian schools and 19th century buildings more generally, the Old School has at most a moderate aesthetic value which derives first and foremost from its principal elevations.

The south elevation of the Old School is the most important, and was designed to present a composed face to the street. Overall, and in comparison to other school buildings of the period, it has a moderate aesthetic value, deriving from its honest use of materials and the careful change in treatment between the gabled master's house and the buttressed school hall with its hipped dormers and long roof ridge. The mouldings are modest or non-existent rather than rich, and there is little attempt at the vigour and verticality of the more expressive Victorian Gothic buildings; instead the elevation relies principally upon the modulation provided by its windows and roofline.

The east elevation has only a minor aesthetic value as it was intended as a utilitarian flank wall, with plain window openings. The rebuilding of the single storey store room is unfortunate, while the painting of that structure's east wall detracts from the view of the building from the street.

The west elevation is mostly hidden from view. It comprises the gable end of the original school hall and the flank wall of the 1890s extension. The former has a high pitched gable with stone banding and a two-centred arch filled with broad plate tracery. As with the south elevation this is a competent essay in an established style but is generic rather than inspired by any particular desire for expression. The latter exhibits the sash windows and hipped dormers characteristic of London School Board buildings of the period, but in a comparatively simple manner. Overall this elevation has a moderate aesthetic value, particularly in that it is seen in conjunction with the south elevation from Park Lane.

The north elevation is complex and made up of various disparate elements, as follows:

- The 1870 portion is relatively plain, with little architectural expression save for the low pointed arches to the east part of the ground floor, and the tall pitched roof above what was originally the rear classroom. This part of the elevation has a minor aesthetic value.
- The 1890s extension has a flank wall and roof facing eastwards which has negligible aesthetic interest and has been altered by the insertion of warehouse doors in the postwar period. The northern gable end of this elevation has plain windows set beneath concrete rendered lintels, with diagonal patterning above in plain brick to add modest relief – it is of minor aesthetic value.
- The flat roofed 1950s extension is entirely utilitarian and has negligible aesthetic value. It does not contribute to the aesthetic interest of the site as a whole.

In terms of the building's interiors, these were originally very plain, with simple or non-existent mouldings throughout. The removal of most furniture, fixtures and fittings, and the subdivision of the rooms, has rendered even the best of the interiors as of only minor aesthetic value.

Communal value

The Old School has moderate communal value as a reminder of the French émigré community in Richmond. It is also more generally of interest as an example of a Catholic school that was built in the mid Victorian period after restrictions on such buildings were lifted. This communal value is essentially expressed in the school's appearance from Park Lane, including its sculptural relief of the Virgin and Child.

Townscape value and setting

The Old School plays a role within the wider townscape through its southern elevation's appearance along Park Lane, in concert with the southern parts of the east and west elevations. For this reason the Old School has been recognised by the London Borough of Richmond as a Building of Townscape Merit, marking it as one that 'contributes positively and significantly to the character and appearance of an area' (Local Plan Core Strategy, 2009). The value of this contribution is described in more detail as part of the conservation area assessment below. The rest of the site and the other parts of the building are not visible from the surrounding townscape, and so may be said not to possess notable townscape value.

The setting of the Old School has changed almost entirely from the time when it was first built. The playground walls may largely survive, and Nos. 3-6 Parkshot can just be glimpsed beyond the trees and wall to the east, but in all other directions the fields and gardens of the Victorian era have all been developed for housing and other uses. None of these buildings establish a deliberate visual or architectural relationship with the Old School, save that some of them occupy the same street.

Summary of significance

The Old School's primary significance resides in its historical and communal value as a Catholic school building from the mid Victorian period, and its aesthetic value as an example of plain Victorian Gothic architecture that derives primarily from its southern elevation and appearance from Park Lane. The flank elevations and the rear of the building, as well as the interiors, have a lesser significance resulting from their more modest character and history of alteration. The 1950s building to the rear is at best neutral, and in aesthetic terms detracts from the setting of the older parts of the site.

3.3 The site's contribution to the Central Richmond Conservation Area

The conservation area as a whole is a highly diverse commercial and residential area, with medieval streets in the centre and 18th and 19th century areas further north. Throughout many parts of the conservation area there has been considerable rebuilding, which has included the replacement of most Georgian buildings along Parkshot with neo-Georgian, Brutalist and

modern office buildings. In many parts of the area backland sites have been developed with housing, commercial units, and car parking.

Park Lane has much in common with the wider area, since although it was only created around 1870 it has been developed with buildings over a long period of time, and has also experienced some redevelopment along most of its northern side. The street therefore has a very varied visual character, including buildings of several styles and colours of brick; some with pitched roofs and others with roofs hidden behind parapets.

The site's role along Park Lane is characterised by its set-back from the street behind a low boundary wall, the restless massing of the gables over the old master's house, and the trees and shrubs which form a notable element in views from the junction with Parkshot. The presence of trees, and the Old School's lower height than most of its neighbours, ensures that it adds some visual relief to the views in both directions. The trees do, however, obscure most of the old school hall and much of the western flank elevation.

In terms of the issues set out in English Heritage's guidance Understanding Place, discussed above, it is clear that the building makes a positive contribution to the character and appearance of the conservation area. Although the architect is not known, and is unlikely to be anyone of particular note, the building's set-back and massing give it a modest landmark quality. It is not part of a wider group of mid Victorian buildings, nor does it form a coherent complex with other stock brick buildings, and it does not relate to any designated heritage assets nearby or contribute significantly to their settings. Furthermore the Old School does not relate to any open space or significant landscape feature; and it is not typical of former uses within the area. Nevertheless, the Old School plays an important visual role as a reminder of the historic development of Park Lane around 1870, and also evokes the history of French Catholics in Richmond. The Old School contributes to the eclectic built character of the conservation area, forming part of the patchwork of different building ages, materials and styles which make up part of its special interest.

The role of the site within the conservation area essentially derives from its street facade, and the parts of the east and west facades that are visible in concert with it. The rear parts of the building are essentially not visible from the rest of the conservation area, and do not contribute meaningfully to its special interest. The former playground, now used as a car park, is also not easily appreciated from the surrounding streets, and aside from its historic boundary wall it plays no visual role in the wider conservation area.

4.0 Legislation and Policies

Statutory Control 4.1

Conservation areas are subject to the Planning (Listed Buildings and Conservation Areas) Act 1990, together with parts of the Enterprise and Regulatory Reform Act 2013. Conservation area designation introduces a general control over the demolition of unlisted buildings and provides the basis for policies designed to preserve or enhance those aspects of the area's character or appearance that define its special interest. Section 72 of the 1990 Act requires that:

in considering whether to grant planning permission with respect to any buildings or other land in a conservation area, the local planning authority shall pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

4.2 National Heritage Policies

National heritage policy governing the application of the primary legislation is contained within section 12 of the National Planning Policy Framework (NPPF, March 2012). Paragraph 128 of the NPPF requires applicants 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.

This Heritage Statement meets these requirements at an appropriate level of detail.

Other relevant sections of the NPPF are as follows:

- 17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:
 - proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. ...;
 - always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - take account of the different roles and character of different areas, promoting the vitality of our main urban areas...;
 - encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value:

- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; [...]
- 126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:
 - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - the desirability of new development making a positive contribution to local character and distinctiveness; and
 - opportunities to draw on the contribution made by the historic environment to the character of a place.
- 128. 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.
- 129. 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 assessment 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.
- 131. In determining planning applications, local planning authorities should take account of:
 - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.

- 134. 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 securing its optimum viable use.
- 135. 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 affect directly or indirectly 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.
- 137. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 138. Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

On deciding whether a building should be considered as a non-designated heritage asset, paragraph 39 of the Planning Practice Guidance, which accompanies the NPPF, states the following (as at 12 June 2014):

Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'.

4.3 Regional Heritage Policies

The Greater London Authority's London Plan (July 2011) contains heritage guidance in Policy 7.8, the relevant parts of which are as follows:

C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

Development affecting heritage assets and their settings should conserve their D. significance, by being sympathetic to their form, scale, materials and architectural detail.

4.4 Local Heritage Policies

The London Borough of Richmond's heritage planning policies are contained within the planning documents set out in this section. It should be noted that as these policies were adopted before the publication of the NPPF in March 2012, they are given weight in decision-making only insofar as they are consistent with the policies of the NPPF (as noted in paragraph 215 of Annex 1).

Local Plan Core Strategy (April 2009)

Policy CP7 Maintaining and Improving the Local Environment is set out in section 8.2.1 of the Core Strategy, and includes the following:

7.A Existing buildings and areas in the Borough of recognised high quality and historic interest will be protected from inappropriate development and enhanced sensitively, and opportunities will be taken to improve areas of poorer environmental quality, including within the areas of relative disadvantage of Castlenau, Ham, Hampton Nurserylands, Heathfield and Mortlake.

7.B All new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Proposals will have to illustrate that they:

(i) are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity;

(ii) connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance and orientation, and sustainable construction.

8.2.1.1 Justification

8.2.1.2 The Borough is locally distinctive by virtue of its a very high environmental quality and historic environment which can be defined by: the River Thames which bisects the Borough, numerous conservation areas, listed buildings and buildings of townscape merit (locally listed buildings), scheduled ancient monuments and sites of archaeological interest including Hampton Court Palace, registered parks and gardens of special historic interest and other designated parkland and open space including the Royal Parks, the World Heritage Site at Kew Gardens and important strategic and local views, including the protected vista from Richmond Park towards St Pauls Cathedral. Views and landmarks that are particular important to the Borough's local architectural character

will be identified on the Proposals Map and in supplementary planning documents, where appropriate. Areas of poorer environmental quality also exist in the areas of relative disadvantage and a public realm improvement programme is under way.

8.2.1.3 The Council will support new development, including extensions and refurbishment, that has evolved from an understanding of the site, the impact on its surroundings, and its role within the wider neighbourhood; and that is based on high quality sustainable design which results in improvements to the area in which it takes place. Considering more than the buildings themselves the design of the spaces between, both private and public, are key to the quality of the environment as a whole and the experience of those who use them.

Local Plan Development Management Plan (November 2011)

Section 4.3 includes the DMP policies on heritage, of which DM HD1 and DM HD3 are relevant to the proposed scheme.

Policy DM HD1 Conservation Areas – designation, protection and enhancement states:

The Council will continue to protect areas of special significance by designating Conservation Areas and extensions to existing Conservation Areas using the criteria as set out in PPS 5 and as advised by English Heritage.

The Council will prepare a Conservation Area Appraisal and Management Plan for each Conservation area, these will be used as a basis when determining proposals within or where it would affect the setting of, Conservation Areas together with other policy guidance.

Buildings or parts of buildings, street furniture, trees and other features which make a positive contribution to the character, appearance or significance of the area should be retained. New development (or redevelopment) or other proposals should conserve and enhance the character and appearance of the area.

The accompanying notes include the following:

4.3.4 It is particularly important that any scheme not only preserves but positively enhances the Conservation Area. Article 4(2) Directions will be used to withdraw permitted development rights where appropriate. These would be used to protect elements which make a key contribution to the character and appearance of a conservation area, local support for a Direction will be an important consideration.

4.3.5 High quality new development and exceptional design which responds to local and historic context can make a very positive contribution. The mis-use of metal, glass, wood cladding and non-traditional materials, where inappropriate, will not be permitted on, or in proximity to Listed Buildings, Buildings of Townscape Merit or in Conservation Areas. Proposals for any schemes within Conservation Areas must include an historical and architectural evaluation of the historic environment within the Design and Access Statement accompanying the planning application. Within this the applicant should provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance. The information that has been considered and the expertise that has been consulted should be set out. As a minimum, the relevant historic environment record should have been consulted and the assets themselves should have been assessed. Outline applications will not be acceptable in Conservation Areas. The level of detail provided should be proportionate to the importance of the heritage asset.

Policy DM HD3 Buildings of Townscape Merit states:

The Council will seek to ensure and encourage the preservation and enhancement of Buildings of Townscape Merit and will use its powers where possible to protect their significance, character and setting, by the following means:

- 1. consent will not normally be granted for the demolition of Buildings of Townscape Merit;
- 2. alterations and extensions should be based on an accurate understanding of the significance of the asset including the structure, and respect the architectural character, and detailing of the original building. The structure, features, and materials of the building which contribute to its architectural and historic interest should be retained or restored with appropriate traditional materials and techniques;
- 3. any proposals should protect and enhance the setting of Buildings of Townscape Merit;
- 4. taking a practical approach towards the alteration of Buildings of Townscape Merit to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that the building's special interest is not harmed, using English Heritage advice as a basis.

The accompanying notes include the following:

- 4.3.13 These are buildings, groups of buildings or structures of historic or architectural interest which have been identified as contributing significantly to the townscape but are not on the statutory list. However, these buildings are of considerable local importance.
- 4.3.14 The list of Buildings of Townscape Merit (BTMs) is maintained by the Council. An appraisal of the architectural or historic interest of a building, followed by a process of public consultation, should be undertaken before the designation of a new building of townscape merit. The following criteria will be used for designation of BTMs:
- 1. Any building or structure which dates from before 1840;
- 2. Later buildings or structures which are considered to be of definite quality and character, including the work of important architects or builders. Particular attention will be paid to buildings which:

- Have important historic associations, in terms of famous people or events;
- Illustrates an important aspect of social or economic history or use;
- Represent an exceptionally good example of a specific and distinctive architectural style;
- Demonstrate excellence in building craftsmanship, use of materials, technical innovation, architectural features and detailing;
- Form part of a distinctive and cohesive group of buildings;
- Retain its original architectural interest and integrity, and not subject to insensitive alterations;
- Have landmark quality or make a unique and positive contribution to the quality of the townscape or an open space.

4.3.15 The Council has control over the demolition of those Buildings of Townscape Merit which are in conservation areas, but elsewhere its powers are more limited. There will be a presumption against demolition of Buildings of Townscape Merit; both for townscape and sustainability reasons. However, should demolition prove necessary, a high standard of design, complementing the surrounding area, will be required in any replacement building.

4.3.16 Development proposals for alteration, extension or change of use to a Building of Townscape Merit or within its setting should protect the architectural integrity of the building, the existing balance between the building and its setting and be proportionate in scale to that of the original building. Architectural features, materials or detailing which contribute positively to the character of a Building of Townscape Merit, should be kept.

4.3.17 The Council will endeavour to protect the character and setting of Buildings of Townscape Merit by as far as possible treating proposals for works to or close to them, which would be visible from the street or any other place used by the public, as if they were Listed Buildings.

Buildings of Townscape Merit SPD (consultation draft, February 2011)

This document sets out designation criteria alongside the London Borough of Richmond's approach to considering proposals for alteration, extension or replacement of Buildings of Townscape Merit. It forms an updated version of the original guidance which originated in the early 1980s. It should be noted that this document remains in draft form, and also that it predates the National Planning Policy Framework, and so should be afforded weight in decisionmaking only insofar as it accords with the NPPF.

The contents of the draft SPD appear to have been largely incorporated into the Local Plan Development Management Plan, as quoted above.

5.0 Assessment of Proposals

5.1 The proposed scheme

The existing warehouse use of the building is inefficient, and is not sustainable over the long term if sufficient income is to be generated to pay for the upkeep and renovation of the building. The structural engineer's report sets out the problems which the building is presently suffering from, and recommends solutions which extend to dismantling and rebuilding the existing historic elevations in order to enable adaptation to new uses which could secure the economic future of the building in the long term.

In order to address the issues facing the site while respecting (as far as practicable) the heritage value of the building, the proposed scheme provides for retaining and repairing the front and flank elevations, which express its principal historical and communal value and form the essence of the building's visual contribution to the character and appearance of the conservation area. The altered interior spaces would be re-planned to accommodate apartments, while the less significant rear part of the building would be rebuilt using reclaimed bricks where possible. This partial rebuilding is intended to enable a workable scheme to go ahead, that would provide the necessary accommodation to allow the building to be productively reused, while safeguarding the most important historic elements.

The 1950s structure to the rear, which detracts from the setting of the main school building, would be removed. To the rear of the school building it is proposed to construct a group of town houses, to enable the scheme as a whole, including the renovations to the more significant parts of the Old School, to be funded.

In addition to the renovation works and new build elements, it is proposed to install photovoltaic slates in the roof valleys, where they will not be visible from street level. These slates are designed to be almost indistinguishable from real slates.

For further information on the reasoning behind the scheme, and the layout and character of the proposals, please see the drawings and other documents submitted elsewhere in the Application.

5.2 Assessment

Effect upon the significance of the Old School

The Old School is a Building of Townscape Merit, and will also be considered as a 'nondesignated heritage asset' under the terms of the NPPF. As noted in chapter 3 above, the building's primary significance resides in its historical and communal value as a Catholic school building from the mid Victorian period, and from the architecture of its southern facade. Subsidiary contributions are made by its flank elevations, and then by the rear of the building and the interiors, which have a lesser significance resulting from their more modest character

and history of alteration. The 1950s building to the rear is at best neutral, and in aesthetic terms detracts from the older parts of the site.

Since the proposals will retain the south elevation and its flanking facades, the main special interest of the building would be conserved, and its historical and communal value would remain highly visible to the local community through the conservation of the Park Lane frontage. The interventions would be targeted at the areas of lesser significance to the rear, and there would be a re-planning of the already-altered interiors to accommodate flats. The removal of some historic fabric would cause some harm to the non-designated heritage asset, but the structural engineer has noted that this is necessary in order to secure the renovation of the building without creating an unacceptably hazardous build process, which would arise if all elements were to be kept in situ throughout. This harm would be offset by the benefits of securing a major renovation of the more significant historic parts of the building and obtaining a beneficial longterm use which will ensure its upkeep in future. The installation of photovoltaic slates in the roof valleys, where they will be invisible from street level, will enhance the energy performance of the building without affecting its public visual character.

In national policy terms, the proposals will satisfy the wish expressed in paragraph 131 of the NPPF by putting the building to a viable use that is consistent with its conservation, and which makes a positive contribution to the economic vitality of the local community. In terms of deciding whether the heritage impact of the scheme is acceptable, the Council is required by paragraph 135 of the NPPF to make a balanced judgement, weighing the losses against the public benefits of the scheme. In this instance the losses comprise some areas of lesser significance, while the public benefits as outlined above are much more considerable.

The regional policy in the London Plan (7.8) requires development to value, conserve, re-use and incorporate heritage assets where appropriate, and to be sympathetic to their form, scale, materials and architectural detail. By retaining as much of the Old School as possible within the development, the proposals would satisfy this policy.

The Local Plan Core Strategy requires in Policy CP7 that development should be appropriate and sensitive to the historic interest of the site, and respect local character. As the foregoing assessment has demonstrated, the proposals develop out of an understanding of the site's heritage value and role within the conservation area, and ensure the retention of the more significant elements of the building so that it can continue to perform its historic townscape role. The design and materials of the proposed new build elements have been carefully chosen so as to respond to their surroundings, and constitute high quality, sustainable design that will improve the character of the Old School's setting.

The Development Management Plan Policy DM HD3 seeks to ensure the preservation and enhancement of Buildings of Townscape Merit. The scheme responds to the detailed points of this policy by avoiding the demolition of the building, and providing for alterations and extensions which reflect an understanding of the building's architectural character and significance, conserve its townscape role and more significant features, and seek to repair the evident structural movement and fabric decay. The new build elements to the rear may also be said to enhance the setting of the asset through their high quality design and layout.

Policy DM HD3 also notes that the Council will assess proposed alterations to Buildings of Townscape Merit as if they concern listed buildings. However this policy has only limited effect since it predates the publication of the NPPF, which now takes precedence and requires works to non-designated heritage assets, such as the Old School, to be evaluated in appropriate to their particular degree of significance (see paragraph 135).

Effect upon the conservation area and nearby heritage assets

The Old School makes a positive contribution to the Central Richmond Conservation Area, which means that the total loss of the building might constitute 'substantial harm' in the context of paragraph 138 of the NPPF. The proposed scheme has been developed to avoid this by ensuring that the parts of the building which are central to this positive contribution are conserved and enhanced, maintaining and improving their contribution to the character and appearance of the conservation area and the streetscape of Park Lane. The removal of the 1950s addition to the rear and the erection of the townhouses would have a minor effect upon the wider conservation area due to their location on a largely unseen backland site. Nonetheless this would improve the appearance of the site and could thus be considered an enhancement. The photovoltaic slates proposed to the roof valleys would not be visible from the wider conservation area and would thus conserve its character and appearance.

The design quality of the proposed townhouses and the careful restoration of the main facades of the Old School would meet the wish expressed in paragraph 131 of the NPPF that new development should 'make a positive contribution to local character and distinctiveness'. The loss of some of the less significant parts of the existing building would form 'less than substantial harm' to the significance of the conservation area, and in line with paragraph 134 of the NPPF this harm should be weighed against the public benefits of the proposal. In this instance the restoration works and establishment of a secure and sustainable long-term beneficial use for the building would constitute clear public benefits that can be held to outweigh the relatively modest harm caused to the conservation area.

In terms of the setting of the listed buildings at Nos. 3-6 Parkshot, the site makes up a minor part of their setting, as it is located beyond their rear garden boundaries and screened by trees. In addition, the primary significance of these buildings lies in their Georgian front facades and surviving historic interior features, while their rear elevations are of more modest interest. The proposals would therefore have a minor effect upon the significance of these designated assets, which would be greatly outweighed by the public benefits of the scheme, as is required by paragraph 134 of the NPPF.

From the analysis of the conservation area and the proposed scheme above, it is clear that the requirements of Core Strategy Policy CP7 will be met by this scheme. In particular the need for areas of historic interest to be protected from inappropriate development and enhanced sensitively.

The proposed scheme would also satisfy the requirement of Development Management Plan Policy DM HD1 that buildings making positive contributions to conservation areas are retained, through keeping and restoring the more significant parts of the Old School and thus the building's publicly visible facades. The policy's stipulation that new development should conserve and enhance the character and appearance of the area is likewise satisfied, through the proposed scheme's use of suitable materials, massing, architectural style and details.

6.0 Conclusion

The National Planning Policy Framework (paragraph 129) requires local authorities to ensure that the particular significance of any heritage asset, whether designated or non-designated, is properly assessed. This assessment has described the significance of the Old School and analysed its role within the Central Richmond Conservation Area: the prime value of the building lies in its historic interest as Catholic school of 1870, and in its street frontage which plays an important role in the townscape of Park Lane. The interiors have been subdivided and, together with the altered rear elevations, are of lesser significance.

The proposed scheme for conversion of the building into a residential use, combined with the removal of the detracting 1950s rear block and the creation of a group of townhouses on the existing car park, would satisfy the requirements of the relevant national, regional and local authority heritage policies. The proposals would ensure the retention of the most significant parts of the historic building, and would conserve its existing contribution to the character and appearance of the conservation area. In addition the scheme would allow for the substantial works of structural repair and fabric conservation which will be necessary in order for the building to survive over the long term. The rebuilding of some areas of lesser significance in salvaged or matching materials would strike an acceptable balance between the hazardous implications of leaving all the walls in situ during the renovations, and removing too much historic fabric.

The proposed scheme would deliver considerable public benefits, through realising a sustainable development in a central location well served by public transport and amenities. It would therefore be in accordance with the core planning principles set out in paragraph 17 of the NPPF. In the light of these public benefits, the loss of areas of neutral or relatively low significance would be entirely acceptable in heritage policy terms.

7.0 Sources

The sources below have been used in the preparation of this report.

Bing Maps

David Carr Consulting Engineers Ltd, Structural Appraisal of The Old School, July 2012

Department for Communities & Local Government, National Planning Policy Framework, March 2012

English Heritage Conservation Principles, Policies and Guidance, 2008

English Heritage, Heritage List

Google Maps

London Borough of Richmond, Central Richmond Conservation Area Appraisal and Map

London Borough of Richmond, Local Plan Core Strategy

London Borough of Richmond, Local Plan Development Management Plan

London Metropolitan Archives (for street photographs from 1971 and 1973)

Ordnance Survey maps

Richmond Local Studies Library

Thames Valley Archaeological Services, Building Appraisal, August 2012

Thames Valley Archaeological Services, Desk-based Heritage Assessment, July 2012

Victoria County History (ed. H.E. Malden), A History of the County of Surrey: Volume 3, 1911

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