

**Richmond Royal Hospital
Kew Foot Road, Richmond TW9 2TE**

Townscape, Heritage and Visual Impact Assessment

December 2018

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1 Introduction

- 1.1 This report has been prepared by KMHeritage on behalf of UKI Richmond Ltd., to support planning and listed building consent applications submitted to the London Borough of Richmond Upon Thames for the development of the site at Richmond Royal Hospital, Kew Foot Rd, Richmond TW9 2TE.
- 1.2 The application seeks planning permission for the conversion of the current healthcare facility to residential use to provide 68 apartments whilst also providing healthcare use on site.
- 1.3 Specifically, permission is sought for:
- Conversion of the listed building to provide residential dwellings;
 - Development of the southern hospital wing to provide residential dwellings;
 - Development of the northern hospital wing to provide residential dwellings and 500 sqm (5,380 ft²) of healthcare uses;
 - Develop a new block on the eastern edge to connect the north and south wings and form a central enclosed landscaped courtyard;
 - Restore and refurbish all three existing buildings respecting their character and architectural heritage;
 - Provide associated car park and ancillary services.

Purpose

- 1.4 The purpose of the report is to assess the proposed development against national and local policies and guidance relating to the historic built environment and for architectural and urban design.
- 1.5 This report should be read in conjunction with the drawings and Design & Access Statement prepared by Rolfe Judd along with other application material.

Nomenclature

- 1.6 Richmond Royal Hospital is referred to as ‘the site’ throughout this report’.
- 1.7 In 2015 English Heritage changed its name to ‘Historic England’ and a new charity, officially called the English Heritage Trust, took the name of English Heritage and responsibility for managing the National Heritage Collection of more than 400 state-owned historic sites and monuments across England. In this report reference is made both to 'English Heritage' and 'Historic England'.

Organisation

- 1.8 This introduction is followed by a description of the history of the site (Section 2). Section 3 analyses the heritage and townscape significance of the site and its context. Section 4 sets out the national and local policy and guidance relating to the built environment that is relevant to this matter. An analysis is provided in Section 5 of the proposed development and its effect in heritage terms. Section 6 contains a Visual Impact Assessment in respect of the proposed scheme. Section 7 examines the proposal in terms of policy and guidance, and Section 8 is a summary and conclusion.

Authorship and contributors

- 1.9 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. He was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Richmond Upon Thames and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect and has a specialist qualification in urban and building conservation.
- 1.10 Historical research was provided by Dr Ann Robey FSA, a conservation and heritage professional with over twenty

years' experience. She has worked for leading national bodies as well as smaller local organizations and charities. She is a researcher and writer specialising in architectural, social and economic history, with a publication record that includes books, articles, exhibitions and collaborative research.

- 1.11 Further research, analysis and drafting for this report was undertaken by Anne Roache M.A. Anne is a researcher with over 25 years' experience. She has worked for leading commercial organizations in the fields of property, planning and law. Alongside a specialisation in the archaeology, architectural and social history of London.

2 The site and its surroundings

2.1 This section of the report describes the history and development of the Site and its surroundings.

Location

2.2 Richmond Royal Hospital is located in the London Borough of Richmond upon Thames and is situated approximately 0.5km north of Richmond town centre (figs. 1 & 2).



Figure 1: The site (Source: Google Maps)



Figure 2: The Site – aerial view (Source: Google Maps)

- 2.3 The site is a complex of interconnecting buildings arranged around a hard landscaped courtyard area. Central to the Hospital is the Grade II Listed, former dwelling that was converted to hospital use in the 1860s. The site has been developed in a fragmentary fashion over the course of the 19th to 20th centuries.
- 2.4 Richmond Royal Hospital was until recently, the main outpatient provider of NHS mental health services to the London boroughs of Kingston, Merton, Richmond, Sutton and Wandsworth. To the east of the site is a community healthcare facility, owned and operated by Hounslow and Richmond Community Healthcare NHS Trust.
- 2.5 The setting of the site is predominantly residential with a mixture of early-late 19th century two and three storey terraced houses. To the north and west the open landscapes of Kew Gardens and the recreational facilities

of the Royal Mid-Surrey Golf Club and Richmond Rugby & Athletics ground provide a green and open aspect to the area.

The site and its surroundings

- 2.6 Kew Foot Road was originally known as West Sheen Lane. It was the main way leading to the horse ferry at Kew and is probably one of the oldest routes in the area.¹ It became a 'foot' road or path when George III ordered the construction of a new road - today's Kew Road - after the building of the first bridge over the river in 1759.
- 2.7 Due to its antiquity Kew Foot Road (or Lane as it was known until the 1870s²), contains an eclectic mix of buildings including an early inn, some good 18th century houses, 19th century cottages and the Richmond Royal Hospital. At the centre of the hospital is a Georgian house³ dating from c.1750, which was remodelled from the simple cottage of the poet James Thomson⁴ who lived there from 1739-1748⁵. The road was described in *The Gentleman's Magazine* of 1824 as '*a row of cottages, with occasionally a house of larger dimensions*'.⁶
- 2.8 Kew Foot Road lies adjacent to what was the Old Deer Park, with its 18th century brick wall and gate and the whole forms a charming streetscape with small and large houses, paths, courts and terraces interspersed with larger properties.⁷ Towards the end of the 19th century the first OS map (1871-1874) clearly shows Rosedale House which became the original hospital in 1867 (fig.1).

¹ LB Richmond upon Thames, *Conservation Area Study, Kew Foot Road*, No. 26, p.1

² Surrey Record Centre Archives Catalogue CC913.

³ It was at various times known by the name of Rossdale, Rosedale and Shaftesbury House.

⁴ James Thomson (1700-1748) was best known for his poems *The Seasons* and *The Castle of Indolence*, and for the lyrics of *Rule, Britannia!* which was set to music by Thomas Arne.

⁵ During the 17th and 18th centuries the area attracted poets, artists, writers and thinkers who were inspired by the river's natural beauty and the sweeping views from places like Richmond Hill.

⁶ *The Gentleman's Magazine*, Nov. 1824, p.443.

⁷ Until 1925, it was also the home of the Royal Laundry.



Figure 1: OS Map of 1871-74 showing Rosedale House before any extensions were made for the hospital or grounds sold for development

The evolution of Shaftesbury House

- 2.9 The nucleus of the hospital is an 18th century brown brick house, two-storeys in height and five-bays wide. It is surrounded by buildings of a later date, constructed in different coloured brick (fig. 2).



Figure 2: The hospital buildings in 2018 showing the different phases of development

2.10 Within the original mid-18th century house is an older core which was occupied between 1739-48 by James Thomson⁸, the Scottish-born poet and playwright. When Thomson lived in the property it was a simple cottage of ‘seven rooms and a kitchen’.⁹ In front of the cottage were fine views looking down to the Thames and the Arcadian landscape beyond (fig. 3).

⁸ b. 1700 d.1748

⁹ Poetry Foundation, Online: <https://www.poetryfoundation.org/poets/james-thomson>



Figure 3: Undated 18th century engraving of the cottage

2.11 The garden was Thomson's pride and joy and he enlarged it during the time of his ownership. After Thomson died the cottage was purchased by his friend George Ross, Esq.¹⁰ who, 'out of veneration to his memory' did not pull it down but 'enlarged and improved it at the expense of £9,000'.¹¹ It seems likely that the property was extended by the addition of two wings and an extra storey and remodelled in the Georgian style. It is said that the old cottage became the entrance hall to the house.¹² The remodelled house became known as Rossdale House, but by the early 19th century this was often corrupted to Rosedale House.

¹⁰ George Ross was a wealthy army agent who became an MP from 1880.

¹¹ Lysons, D (1792), 'Richmond', in *The Environs of London: Volume 1, County of Surrey* (London), pp. 436-469. British History Online <http://www.british-history.ac.uk/london-environs/vol1/pp436-469>.

¹² Richmond Upon Thames Local Studies Library and Archive, *Kew Foot Road Cuttings*.

- 2.12 Ross who was extremely wealthy, seems to have further improved the property by employing the fashionable and sought-after designer Lancelot ‘Capability’ Brown (1716-1783) to refashion the gardens. Comprising of two acres of grounds; there were lawns, shady walks and specimen planting. Ross died in 1786 and the auction catalogue for the property described ‘*celebrated and much-admired pleasure grounds were laid out and planted by that celebrated Landscape Gardener ‘Capability Brown’ affording (on a modest scale) a most beautiful and interesting specimen of his genius and taste*’.¹³
- 2.13 The house next became the property of the Hon. Mrs Frances Boscowen, widow of the famous Admiral who probably used Rosedale as a summer retreat. Well known as a literary hostess, she preserved there her collection of relics of James Thomson and the house was open to members of the public who wished to see these. She died in 1805, and the house appears to have been purchased by the Hon. Cropley Ashley-Cooper (later 6th Earl of Shaftesbury), in 1802.¹⁴
- 2.14 In July 1822, one John Evans visited the house on a tour of the Richmond area: ‘a large handsome brick mansion, Rosedale House, the residence of the Earl of Shaftesbury’.¹⁵ The notes of his trip were published in *The Gentleman’s Magazine* in 1824;

‘On the entering into the house you are shown two small rooms on the ground-floor, connected by an archway, and thrown into a kind of hall. On the left is the room in which Thomson breathed his last, being his bed chamber; and on the right is his sitting room, where he passed the time, with brass hooks fixed round, upon which he hung his hat and cane; also, a table on which he wrote, and lastly, the very fireplace before which he no doubt sat in

¹³ Richmond Upon Thames Local Studies Library and Archive, LM/368.

¹⁴ Richmond Upon Thames Local Studies Library and Archive, SR333/5.

¹⁵ *The Gentleman’s Magazine*, Vol. 94, part 2 (1824), p.443.

musings deep. The woman that showed the house said that in Thomson's time 'these were the only apartments'.

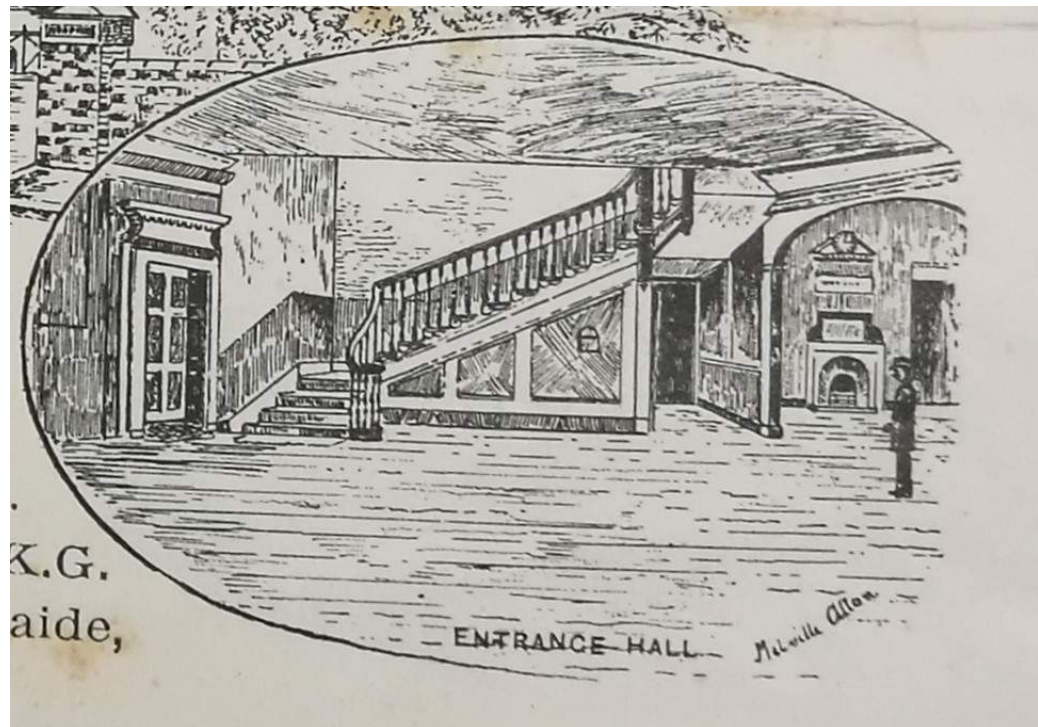


Figure 4: The hall when first occupied by the hospital but very much as described in 1824 when said to encompass the two rooms joined by an arch that had been James Thomson's in the original cottage [© Richmond Upon Thames Local Studies Library and Archive]

2.15 Evans continued:

'Since that period two wings had been added, as well as storeys, by George Rose (Ross) Esq. an Army Agent, so that it is the most handsom house in Kew Foot Lane. It is much to the praise of the present Noble Owner, that this position of the original cottage should have been thus sacredly preserved amidst a profusion of modern improvements'.¹⁶

2.16 It seems therefore that the two wings that are slightly set back from the central block were added by Ross, and that the house was enclosed in a Georgian brick shell of simple classical proportions. An additional storey was also added.

¹⁶ *Ibid.*

If George Ross could afford to employ Capability Brown to redesign the garden and spend the enormous sum of £9000 on rebuilding and modernising the property, then an architect of some merit was probably engaged on the work to the house, but who it was is not known.

2.17 It is likely that during the ownership of the Earl and Countess of Shaftesbury (1802 to 1865), alterations to the house were made. In fact, a 1901 photograph of a white marble mantelpiece which was by then at one end of the principle ward, states it dated from c.1805 (fig. 5).¹⁷ The classical motifs on the fireplace suggest that it may have been put in at the same time that the Ionic porch was added.



Figure 5: 1901 photo of white marble fireplace dating from c.1805 [© Richmond Upon Thames Local Studies Library and Archive]

2.18 A mid-19th century view of the house from the garden shows it c.1860, when the home of the Dowager Countess of Shaftesbury and commonly known as Shaftesbury House (fig. 6). Another undated view is probably from similar period (fig. 7). The Duchess died

¹⁷ Another hand-carved mantelpiece said to be the work of Grinling Gibbons was said to have been added during the time of the Shaftesbury's and this was later found in the House Surgeon's sitting room.

there in 1865 and soon after the house was put up for auction.



Figure 6: View from the grounds, c. 1860



Figure 7: View of the house from Kew Foot Road (undated)

2.19 The 1865 sales catalogue¹⁸ described the freehold property and included a block plan (fig. 8). It stated that:
'The Residence is a plain moderate-sized building, and containing:

ON THE UPPER STORIES,

Three Servants' Bed Rooms, and a Box Room: five Principal Bed Chambers and a Dressing Room, and two water closets;

ON THE GROUND FLOOR,

A spacious Entrance Hall and Vestibule with fire-place: principal and secondary¹⁹ Staircases: a cheerful Drawing Room of good proportions, with embayed and other windows overlooking the Pleasure Grounds: a Breakfast Room and a Library, each with French windows opening to a balcony: from which a flight of stone steps leads down to the Lawn; a Dining Room with arched recess and Closet; and conveniently near is a large and lofty Kitchen and Scullery with sink and pump.

IN THE BASEMENT,

A Larder, Housekeeper's Room, Still Room, Servants' Hall with two Closets, Store Room with two Closets, a small room adjoining with a sink, pump and closet, Knife Room, Butler's Pantry with two closets, two Wine Cellars, an Ale Cellar, Area with four Cellars for Coals, &c, a Paved Yard in which is a capacious cistern and ash pit'

¹⁸ Richmond Upon Thames Local Studies Library and Archive, LM/368.

¹⁹ sic

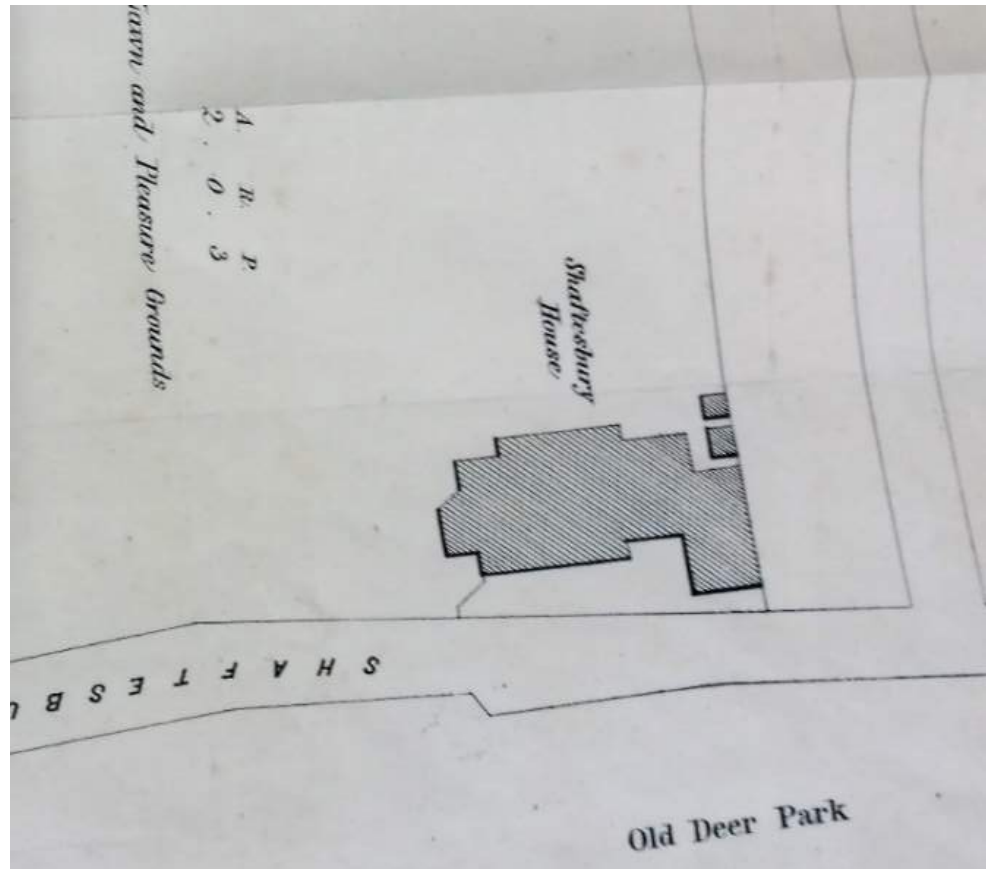


Figure 8: Block plan of Shaftesbury House in 1866

- 2.20 It appears that the house failed to sell however it was destined for a new use.

The establishment of the Richmond Infirmary

- 2.21 In 1863, it had been decided that an infirmary for the poor was needed in the Richmond area and a committee was set up to raise funds and find a suitable site. In 1867, the unsold Shaftesbury House was offered to the Infirmary Committee on favourable rental terms of £100 per annum per from 1866, with an option to purchase it for £2,100 after three years.
- 2.22 Shaftesbury House reopened as Richmond Infirmary²⁰ in February 1868. It had 12 beds – 6 for the poor and 6 for

²⁰ The hospital was called Richmond Infirmary between 1868 and 1878; the Richmond Hospital between 1879 and 1893 and the Royal Hospital, Richmond from 1895.

servants. A photograph of 1868 shows it soon after opening (fig. 9²¹). The works to establish the hospital appear to have involved a two-storey extension of the northern wing towards the road, and a single-storey building added adjacent to the southern wing.

2.23 By 1872, the number of beds had increased to 15. The Infirmary treated acute medical and surgical cases and was 'free to every case of accident or emergency'. The Duke of Cambridge became its first Royal Patron in 1873 and by 1874, demand for beds had led to a building fund being established 'to enlarge the present establishment and to provide a resident Surgeon'.²² The Infirmary was renamed the Richmond Hospital in 1879.²³



Figure 9: View in 1868

²¹ Richmond Upon Thames Local Studies Library and Archive ©, *The Royal Hospital Richmond Surrey, Souvenir Album*.

²² Richmond Upon Thames Local Studies Library and Archive, *7th Annual Report of the Richmond Infirmary (1874)*.

²³ Richmond Upon Thames Local Studies Library and Archive, *Richmond Infirmary pamphlets and cuttings*.

- 2.24 In 1880, the Hospital Governors agreed to proceed with the building of two new wards for 48 beds. By 1882 works were completed at a cost of £4,380. Princess Mary Adelaide opened the wards (named 'Mary Adelaide' for women, and 'Cambridge', after the Duke of Cambridge, for men). In 1895 Queen Victoria became patron and directed that the hospital be known as the Royal Hospital, Richmond.²⁴
- 2.25 Improvement and expansion works continued and in 1896, a children's ward (Princess May Ward), isolation ward, new boardroom, nurses' accommodation²⁵, and domestic and ancillary accommodation were opened by the Duke and Duchess of York.²⁶ By this time very little remained of the original Rosedale House beyond the façade except for the panelled halls and wide oak staircase as well as the panelled chamber supposed to have been the study of the poet James Thomson.²⁷ The latter became the Matron's sitting room.
- 2.26 The extensions made to the hospital in 1882 and 1896 account for the additions made to each side of the original building. The north extension was built on to the northern wing of the original building and was constructed over two floors with a pitched roof. This extension is made with yellow stock brick and red brick dressings above the window openings. To the south of the main part of the house, the south wing and adjacent single-storey structure were replaced by a new four storey building, including a dormer level in the mansard has since been added. This wing is stylistically very similar to the north wing and is constructed in yellow stock brick

²⁴ *Ibid.*

²⁵ Unusually, each nurse had her own spacious room overlooking Richmond Park.

²⁶ Later King George V and Queen Mary. The Duchess of York had led fundraising efforts for the children's ward. Richmond Upon Thames Local Studies Library and Archive, *The Royal Hospital Richmond Surrey Souvenir Album*.

²⁷ Lost Hospitals of London <https://ezitis.myzen.co.uk/royalrichmond.html>

and red brick detailing, with two bay windows at ground floor.

- 2.27 The OS Map of 1896 shows how much of the garden had by now been sold off by the Shaftesbury Estate to be developed for housing. The new hospital extension is clearly shown to the north of the original house (fig. 10).



Figure 10: OS Map of 1896 showing the first extensions dating from 1880-82 and 1996

- 2.28 A photograph of 1898 shows that the name of the hospital has appeared on the façade and a small pediment to the roofline of the main block (fig. 11²⁸). The original but altered north wing of Shaftesbury House had seen the addition of a chimney and projecting Oriel window on the first floor of the 1860s frontal extension, topped with another small pediment. This was altered in the early part of the 20th century by the addition of a mansard roof and two dormers either side of a reconstructed and more

²⁸ © Richmond Upon Thames Local Studies Library and Archive.

elaborate chimney. The 1860s frontal extension was removed in 1990. A large three bay porch was added to the front in the 20th century and was still present in 1990, and has since been removed.²⁹



Figure 11: The view of the hospital from the front in 1898

2.29 In 1897 an appeal for funds was organised to coincide with Queen Victoria's Jubilee. By now the hospital had garnered a solid reputation for the treatment of a wide range of medical conditions. Two cottages in Kew Foot Road and two in Shaftesbury Road were purchased and on their sites was built a new out-patients department, designed by Frank Brewer, which opened in 1904 (fig. 12³⁰). The new wing contained consulting and examination rooms, special rooms for eye, ear and throat examinations, and an X-ray room, as well as a Dispensary. The waiting hall had an open-timbered roof, with enriched plaster panels between the roof trusses, and a large glazed lantern light. The floors were of polished

²⁹ Montagu Evans, Richmond Hospital Historic Building Report, (2015), p. 4.

³⁰ © Richmond Upon Thames Local Studies Library and Archive.

wood, and the walls and chimney pieces of glazed ceramic ware. The new building was connected to the main hospital by a covered corridor



Figure 12: The Out-patients department opened in 1904

The early 20th century

- 2.30 In 1908, the Swan Memorial Ophthalmic wing, comprising two wards, was added by way of a corner extension executed in yellow stock brick with red brick detailing (to match the 1904 out-patients building) (figs. 13 & 14³¹).

³¹ © Richmond Upon Thames Local Studies Library and Archive.



Figure 13: A drawing of the Ophthalmic ward together with the Out-patients building



Figure 14: A photograph of the corner extension in the early 20th century

- 2.31 By 1910, the hospital could accommodate 66 in-patients and that year treated 9,000 out-patients.³² The new extension buildings are clearly shown on the OS Map of 1913 (fig. 15).



Figure 15: OS Map ,1913

- 2.32 During the First World War, the hospital was affiliated with the Third London General Hospital and 50 of its beds were reserved for sick and wounded servicemen. In 1914, a Mortuary Chapel to the designs of H. Percy Adams, FRIBA, was added to the hospital and in 1923, an X-ray department was built to the north, Evelyn Road, side of the site. At the same time electric lights and central heating were added throughout. In 1924 the floors of the two main wards were re-laid with composition flooring.
- 2.33 By 1926, the hospital functioned as a Nurses' Training College, necessitating accommodation to be added above the out-patients department and the wards were enlarged. In 1931, the hospital has 88 beds and a new

³² Richmond Upon Thames Local Studies Library and Archive, *Richmond Infirmary pamphlets and cuttings*.

operating theatre was opened. In 1936, an additional storey was added to the Nurses' Home, new offices, kitchens and a laundry were provided and verandas were added to the Women's and Children's Wards.³³ Later, 1960s infill joined together the out-patients wing and ophthalmic ward along Shaftesbury Road.

The later 20th century and early 21st century

- 2.34 The hospital continued to expand and by 1948 when it joined the NHS there were 121 beds. It became part of the Kingston Group of hospitals and its management taken over by the Kingston Group Hospital Management Committee (1948-1967), and thereafter by the Kingston and Long Grove Group HMC (1967-1974). After 1974 it fell within Kingston and Richmond District. In 1977 it lost its in-patient wards and operating suite and ceased operating as a general hospital. The rehabilitation unit on Evelyn Road, behind the main building, was built in 1980 to designs by architects Hutchinson, Locke and Monk.³⁴ In 1986, the building became a night hostel for the homeless.³⁵
- 2.35 A serious arson attack occurred in 1992. *The Richmond and Twickenham Times* reported that the 'glass dome exploded' and that 'the core of the building which is listed and dates back to the 18th century was worse hit'.³⁶ By 1995, plans were made to return it to medical use and refurbishment and redevelopment of the hospital were undertaken at a cost of £4.5m.³⁷ A large three bay porch which had been added to the front in the 20th century and was still present was removed. These alterations can be identified in the brickwork of the north projecting wing

³³ Richmond Upon Thames Local Studies Library and Archive, *Richmond Infirmary pamphlets and cuttings*.

³⁴ Cherry, B. & Pevsner, N. (1983) *The Buildings of England: London 2: South*, p 521.

³⁵ Richmond Upon Thames Local Studies Library and Archive, *Kew Foot Road cuttings*.

³⁶ *Richmond and Twickenham Times*, 21 Feb 1992.

³⁷ *Richmond and Twickenham Times*, 10 Mar 1995.

had been altered by the 1990s and has now been completely removed. The Oriel window too had been removed and the fenestration changed.

- 2.36 In 2005 English Heritage installed a Blue Plaque on the original block of the hospital which states 'John Thomson (1700-1748), Poet, Author of Rule Britannia, lived and died here'.
- 2.37 The building was, until recently, the Richmond Community Mental Health Resource Centre.

3 The heritage and townscape significance of the site and its context

- 3.1 This section of the report describes the heritage and townscape significance of the site and its surroundings.

The heritage context of the site

Conservation area

- 3.2 The site is located within the Kew Foot Road Conservation Area (36) which was designated in 1982.³⁸ A map of the conservation area is included as Appendix A. It is bounded on its western edge by the Old Deer Park Conservation Area (57) and adjoins Central Richmond (17) to the south and Kew Road (55) to its north east.

Listed buildings

- 3.3 Part of the Richmond Royal Hospital is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest. The listing description reads:

Name: Original Block of Richmond Royal Hospital, Kew Foot Road

List entry No. 1193875 Grade: II

Date first listed: 25-Jun-1983

Formerly a house, later incorporated into a hospital. Mid C18, formerly comprising 5-bay centre and 2-bay wings set back, the south wing demolished c1882, when an extra storey was added to the north wing and a projecting 2-storey wing obscured it.

The poet James Thomson lived here from 1736 until his death in 1748 and wrote his most famous works here, the

³⁸ London Borough of Richmond upon Thames, Kew Foot Road (36) Conservation Area Statement

masque "Alfred", which includes the anthem "Rule Britannia" (1740), "The Castle of Indolence" (1748) and "The Seasons" (1738). After Thomson's death the house was bought by a friend, George Ross, who enlarged it, and in 1786 it was bought by Mrs Boscawen, widow of the famous admiral. On her death in 1805 it was bought by the 6th Earl of Shaftesbury, who changed the name to Shaftesbury House.

Built of stock brick with roof partially concealed by parapet, the other part tiled. Two sections. The right-hand part of three storeys, five bays. Stone coping ramped up in centre to form a pediment. Cambered sashes, 9-pane to second floor, 12-pane to first floor. Four bays of ground floor obscured by late C19 or early C20 projection but original Ionic portico incorporated in end. Cornice has mutule frieze and 4-leaved paterae. To left side is a further 2-bay C18 wing with early C20 mansard roof. Second-floor windows are early C20 in original architraves but the other floors are obscured by the later extension. Rear elevation has mainly 12-pane sashes to the main part and C20 windows to the north wing. Mansard tiled roof and C19 chimneystacks. C19 attached hospital buildings not of special interest.

INTERIOR has entrance hall with mid C18 staircase with scrolled tread ends and two turned balusters to each step, doorcase with bolection moulding, 6-panelled door and panelling with dado rail. Other features this floor include large room to wing with ovolo-moulded cornice and dado rail and fireplaces with eared architraves. First floor has mid-C18 panelled room and fireplace with brackets, Vitruvian scroll and C19 tiled surround. Moulded cornice to rear room. Second floor retains old floorboards.

3.4 There are a number of statutorily listed buildings in the vicinity of the site³⁹ Those most relevant to consideration of development at the site include:

Grade II*:

- Kew Foot Road, Nos. 19, 21, 23;

Grade II:

- Kew Foot Road Nos. 12, 14 (Magnolia Cottage), 39 and the Pavilion at Richmond Athletics Ground.

Locally Listed buildings

3.5 The southern wing of the hospital (31 Shaftesbury Road), is identified as a Building of Townscape Merit (locally listed) as is the northern wing, adjacent to the original hospital building.

3.6 In addition, locally listed buildings in the vicinity of the site⁴⁰ include:

- Evelyn Road: Nos. 1-43 (inclusive);
- Joycelyn Road: Nos. 2-12 (even), 11-17 (odd), 23 & 25;
- Kew Foot Road: 3-7, 15, 27-35 (odd), 18 & 20 and the Wall to the Old Deer Park;
- Kew Road: No. 100-110, 114, 162, 170-82 (even), 115-117, 151 (odd);
- Shaftesbury Road: Nos. 1-34 (inclusive).

3.7 These buildings are shown in Figure 16.

³⁹ London Borough of Richmond upon Thames, *Listed Buildings Register*, October 2017.

⁴⁰ London Borough of Richmond upon Thames, *Buildings of Townscape Merit*.

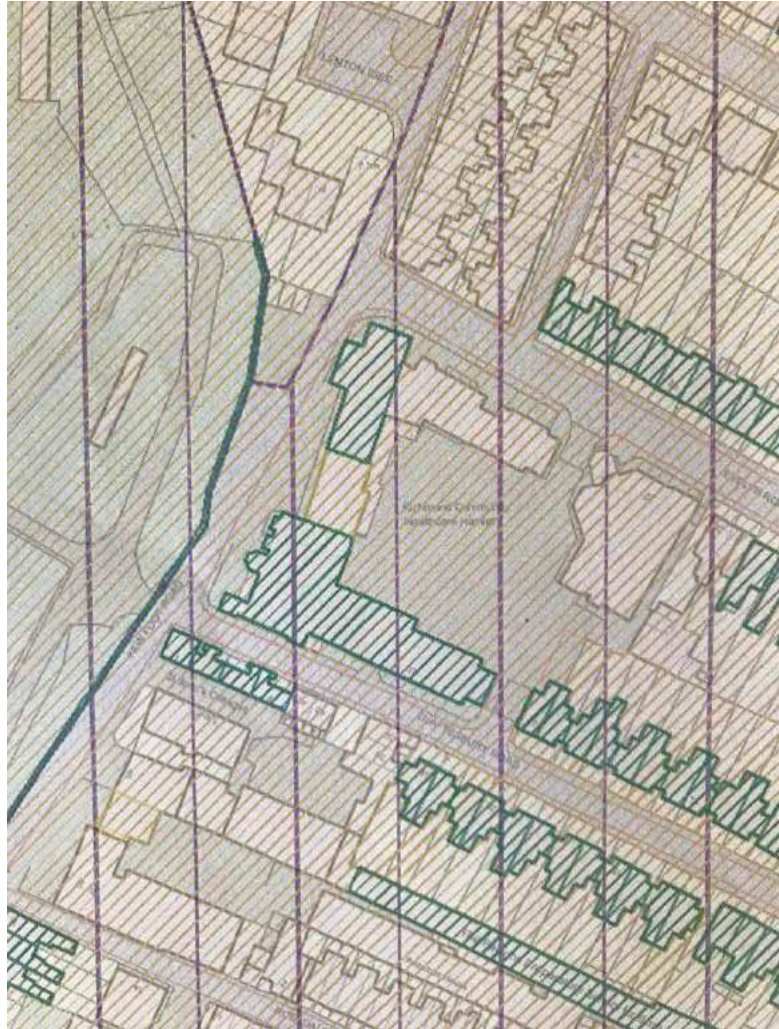


Figure 16: Locally listed buildings on the hospital site and in its vicinity, shown in green hatching (© London Borough of Richmond Upon Thames)

Other designations

- 3.8 The site is located close to the UNESCO World Heritage Site of the Royal Botanic Gardens. The Old Deer Park Conservation Area also forms part of the Grade I Royal Botanic Gardens registered landscape⁴¹, and both conservation areas are within the Royal Botanic Gardens World Heritage Site Buffer Zone. The Old Deer Park is designated as Metropolitan Open Land.

⁴¹ A 'garden or other land is registered under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks and Gardens by English Heritage for its special historic interest'.

Assessing heritage and townscape significance: concepts and terminology

- 3.9 The listed buildings, conservation areas, World Heritage Site and registered landscape are ‘designated heritage assets’, as defined by the National Planning Policy Framework (NPPF). Locally listed buildings can be considered as ‘non-designated heritage assets’.
- 3.10 ‘Significance’ is defined in the NPPF as ‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’ The English Heritage publication ‘Planning for the Historic Environment Practice Guide’ defines significance as ‘the sum of its architectural, historic, artistic or archaeological interest’.
- 3.11 ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ (English Heritage, April 2008) describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value.
- 3.12 The conservation area, World Heritage Site, registered landscape, listed buildings and locally listed buildings have evident special architectural and historic interest (or in the case of the World Heritage Site, ‘Outstanding Universal Value’). Any proposals for the site must have regard for the preservation of that special interest.

The significance of the Richmond Royal Hospital and its context

‘Evidential value’

- 3.13 The listed and unlisted structures of merit in the vicinity of the site, and their relationship to one another and the conservation areas, collectively illustrate the development of this part of London. They tell how Richmond evolved during the 19th and 20th centuries and in particular about

the transformation of the area from the mid-late 19th century onwards. The recent history of the site provides evidence of the structural changes in health care in the late 20th century and the early 21st century. The area and its buildings are a record of social and economic change and lifestyles in various periods, and illustrate the effect these things had on the historic building stock and urban grain.

- 3.14 In terms of Historic England's 'Conservation Principles' the site and its surroundings provide us with 'evidence about past human activity' and, by means of the fabric, design and appearance of the site and surrounding built form, communicates information about its past. Alteration, demolition and redevelopment has not entirely removed the ability of the site and other historic buildings in the vicinity to do this, and the site and the conservation area retains sufficient historic character and appearance to convey historical ethos.

'Historic interest' or 'Historical value'

- 3.15 The Richmond Royal Hospital clearly has historical significance, for the reasons set out in the account of the site's evolution above. This significance is not just to do with the fabric of the building, but also with its use as an early public hospital.
- 3.16 The early history of the site reveals associations with James Thomson, George Ross and the 6th Earl of Shaftesbury. From the 1860s, the site provides extensive interest as an example of how 19th century health care facilities were established and developed, and the subsequent story of the hospital is illustrative of how health care has since changed.

'Architectural interest', 'artistic interest' or 'aesthetic value'

- 3.17 The buildings of Richmond Royal Hospital have 'architectural' and 'artistic interest' (NPPF) or 'aesthetic value' ('Conservation Principles') in varying degrees. In respect of design, 'Conservation Principles' says that 'design value... embraces composition (form, proportions,

massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship'. The listed and locally buildings retain the features of the original external design that contribute to each of these qualities.

- 3.18 However, significant changes have occurred that has reduced aesthetic significance at the site. The site has been very altered through institutional health care use over a very long period. This means that the interior of the unlisted buildings that make up the site have little or no merit, with only minor and very localized exceptions. Similarly, there have been extensive external additions and alterations of modest or no significance in themselves – this is particularly the case in respect of the 1904 building. The listed building has only modest heritage significance or special interest behind the façade; this and the 1904 building are discussed further in the next subsection. Nonetheless, the external appearance of the listed building and the older buildings facing Kew Foot Road and Shaftesbury Road make a positive contribution to the conservation area (as well as the site having two Buildings of Townscape Merit). The portion of the site facing Evelyn Road (which dates from the inter-war period or later) is of much less significance. The courtyard and car park area behind the street frontages detracts from the setting of the listed building and the conservation area.

The listed building

- 3.19 Internally, the conversion of Shaftesbury House to use as a hospital resulted in, from an early date, the erosion of the Georgian character of the original house. The ground floor hall, with its arch and stairs, along with the first floor hall, southern room leading directly from it and a single room in the basement beneath the hall, are what survives in a meaningful way from that period. This is seen in the evidently 18th century internal decorative treatment – paneling, box cornices, etc – in these rooms. At ground floor, the plan form of the house beyond the hall has been significantly altered by large new openings to

interconnect the rooms and to create links to other parts of the site. Here, a Georgian decorative treatment partially survives, but its quality is significantly lower than that found in, say, the first floor southern room. Elsewhere the internal character of the house derives directly from the initial phase of hospital conversion and expansion – the 1860s to the 1890s – and from the very many changes that occurred throughout the 20th century in connection with hospital use and other changes that occurred at the site. The room in the original northern wing at first floor, and the spaces at the rear of first and second floors are characterized by late Victorian or later decoration, with considerable evidence of late 20th century ad hoc interventions. The plan, away from the Georgian core, at first and second floors, has been altered extensively, as has the basement. There are few fireplaces left in the listed building. The arson attack of 1992 caused extensive damage. While the listed building was obviously restored, it is clear that a good deal of its fabric dates from this period

- 3.20 The main heritage significance of the listed building lies therefore in its historical associations and in its Georgian architectural character where this survives in an authentic form. Later architectural interventions, associated with the conversion and extension of the listed building for hospital use from the 1860s onwards also have some value, but the Victorian and Edwardian developments affecting the listed building are relatively generic in their design and tend to obscure the unique interest of a Georgian cottage converted into a grand house.

The Shaftsbury Road Wing

- 3.21 The Outpatients Department on Shaftsbury Road was added in 1904 to designs by Frank Brewer. It faced the street while behind it what appears to be a contemporary ward block (demolished in 1994) extended from the rear of the Kew Foot Road range. The Outpatients Department was extensively altered from its original design throughout the 20th century. On the Shaftsbury Road

façade two storeys were added to provide further accommodation, and the once almost double height space has been divided. The segmental pediments which topped the windows on the first floor have been removed and a further floor and dormer level have been added.

- 3.22 What was a single space has been heavily sub-divided, and the sole items of interest now within the locally listed building are two elaborate fireplaces, two later columns and pilasters and some joinery. Otherwise the interior of the building is without any architectural character. Externally, the only surviving significance lies in the Shaftsbury Road elevation, which despite alteration from Brewer's original design, has some architectural integrity. The elevation facing the courtyard has been extended in the late 20th century into the courtyard at the Kew Foot Road (western) end and a modern stairs added at the eastern end. Between these two, what survives of the early 20th century building in the form of a short stretch of elevation is very plain and unremarkable, and has also clearly been altered – its character is of utilitarian and expedient alteration, rather than possessing any quality that contributes to the local significance of the building.

Townscape significance

- 3.23 The townscape significance of the hospital site lies in its institutional character and appearance, providing a contrast with the generally low scale residential character and appearance of the surrounding conservation area in both the style and scale of its buildings. The site interrupts the grain of the 19th century street pattern with a single large plot. Finally, the Kew Foot Road frontage serves to create a notable townscape feather on the edge of the Old Deer Park registered landscape.

Conclusion

- 3.24 The listed building, both as a Georgian dwelling and in its subsequent use as a hospital, has evidential, historical, aesthetic and communal value in varying degrees, though

its plan has been altered, much of its fabric is recent (probably as a result of the 1990s arson attack) and much decorative detail is also recent and approximate in its selection given the age of the listed building

- 3.25 The other parts of the site, including the locally listed buildings, possess these values to a lesser or no degree. Where it exists, their significance is confined to their exterior. The site has seen considerable change over time, which has significantly reduced the aesthetic value of the site in many respects. In the listed building and the Buildings of Townscape Merit, change has altered plan layouts and removed fabric and decoration from the interiors with only very isolated exceptions.

4 The legislative, policy and guidance context

Introduction

- 4.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.
- 4.2 Section 6 demonstrates how the proposed development complies with statute, policy and guidance. Not all the guidance set out in this section is analysed in this manner in Section 6: some of the guidance set out below has served as a means of analysing or assessing the existing site and its surrounding, and in reaching conclusions about the effect of the proposed development.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 4.3 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66(1) of the Act requires decision makers to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.

The National Planning Policy Framework

- 4.4 The Government published the revised version of the National Planning Policy Framework (NPPF) on 24 July 2018.

- 4.5 Chapter 12. of the National Planning Policy Framework deals with design: Achieving well-designed places. It begins:

'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process' (paragraph 124).

- 4.6 Paragraph 127 advises that 'planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Proposals affecting heritage assets

- 4.7 Chapter 16 of the National Planning Policy Framework: ‘Conserving and enhancing the historic environment’ deals with Heritage Assets describing them as ‘an irreplaceable resource’ that ‘should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations’.⁴²
- 4.8 Paragraph 189 brings the NPPF in line with statute and case law on listed buildings and conservation areas. It says 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 should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’*
- 4.9 In terms of the local authority, paragraph 190 requires that they ‘identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between

⁴² The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

the heritage asset's conservation and any aspect of the proposal.'

4.10 Paragraph 192 says that:

In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

4.11 Paragraph 193 advises local planning authorities that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

4.12 Paragraph 195 says:

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, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and*

- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use.*

- 4.13 Paragraph 196 says that ‘where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’ (paragraph 196).
- 4.14 In taking into account the effect of an application on the significance of a non-designated heritage asset the local authority should employ a ‘a balanced judgement’ in regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 197).
- 4.15 The NPPF introduces the requirement that ‘Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred (paragraph 198).
- 4.16 Where a heritage asset is to be lost, the developer will be required to ‘record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible’ (paragraph 199).⁴³
- 4.17 In terms of enhancing the setting of heritage assets the NPPF states that ‘local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of

⁴³ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. (paragraph 200).

- 4.18 It goes on however that ‘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 195 or less than substantial harm under paragraph 196, 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’ (paragraph 201).
- 4.19 Finally, paragraph 202 requires that the onus will be on local planning authorities to ‘assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies’.

Planning Practice Guidance

- 4.20 In 2014 the government published new streamlined planning practice guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the section entitled ‘Conserving and Enhancing the Historic Environment’. It is subdivided into sections giving specific advice in the following areas:
- Historic Environment Policy and Legislation
 - Heritage in Local Plans
 - Decision-taking: Historic Environment
 - Designated Heritage Assets
 - Non-Designated Assets

- Heritage Consent Processes and
 - Consultation Requirements
- 4.21 The government is consulting on revised Planning Practice Guidance in conjunction with the revised NPPF.

Historic England's Good Practice Advice in Planning Notes

- 4.22 The NPPF incorporates many of the essential concepts in Planning Policy Statement 5 'Planning for the Historic Environment'. PPS5 was accompanied by a 'Planning for the Historic Environment Practice Guide', published by English Heritage 'to help practitioners implement the policy, including the legislative requirements that underpin it'. In the light of the introduction of the NPPF, Good Practice Advice notes 1, 2 and 3 supersede the PPS 5 Practice Guide, which was withdrawn on 27 March 2015. These notes are:

- Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans
 - Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment
 - Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets
- 4.23 This last piece of guidance is addressed later in this section.
- 4.24 Historic England's 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' is referred to in Section 2 of this report.

The London Plan

- 4.25 The London Plan 2016 (consolidated with alterations since 2011) is the current the spatial development strategy for London. This document, published in March

2016, is consolidated with all the alterations to the London Plan since 2011. It contains various policies relating to architecture, urban design and the historic built environment.

- 4.26 Policy 7.4 deals with ‘Local character’ and says that a development should allow ‘buildings and structures that make a positive contribution to the character of a place, to influence the future character of the area’ and be ‘informed by the surrounding historic environment’.
- 4.27 Policy 7.8 deals with ‘Heritage assets and archaeology’, and says:

A London’s heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site’s archaeology.

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

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

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved

or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

4.28 Policy 7.9 deals with ‘Heritage-led regeneration’, and says:

Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.

The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

4.29 Policy 7.10 deals with world heritage sites. It says:

A Development in World Heritage Sites and their settings, including any buffer zones, should conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance and Outstanding Universal Value. The Mayor has published Supplementary Planning Guidance on London’s World Heritage Sites – Guidance on Settings to help relevant stakeholders define the setting of World Heritage Sites.

B Development should not cause adverse impacts on World Heritage Sites or their settings (including any buffer zone). In particular, it should not compromise a viewer’s ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. In considering planning applications, appropriate weight should be

given to implementing the provisions of the World Heritage Site Management Plans.

- 4.30 The Mayor has published the *London World Heritage Sites SPG on Setting*⁴⁴.
- 4.31 Consultation on the Draft New London Plan occurred in recent months, and closed in early March 2018. The Draft London Plan is a material consideration in planning decisions. It gains more weight as it moves through the process to adoption though ‘the weight given to it is a matter for the decision maker’.
- 4.32 A new policy, Policy HC1 ‘Heritage conservation and growth’, echoes the policies of the current London Plan. Policy HC1C says:

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

- 4.33 Policy HC1E says:

Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

Local Policy: Richmond Upon Thames Local Plan

- 4.34 The Local Plan was adopted by the Council on 3 July 2018. It supersedes the Core Strategy and the Development Management Plan.

⁴⁴ 2012, *The London World Heritage Sites SPG on Setting*, Mayor of London, London

4.35 The Council's 'Strategic Vision' includes 'Protecting Local Character' and says:

The borough's villages and their special and distinctive characters will have been protected, with each being unique, recognisable and important to the community and to the character of the borough as a whole. They will continue to maintain and enhance their distinctiveness in terms of the community, facilities and local character. Heritage assets including listed buildings and Conservation Areas, historic parks as well as Royal Botanic Gardens, Kew World Heritage Site, which contribute so significantly to the character of this borough, will have been protected and enhanced.

4.36 'Protecting Local Character' is also a 'Strategic Objective' of the Plan. It aspires to 'Protect and, where possible, enhance the environment including the heritage assets, retain and improve the character and appearance of established residential areas, and ensure new development and public spaces are of high quality design'.

4.37 Part 4 of the Plan deals with 'Local Character and Design'. It includes:

- Policy LP 1 'Local Character and Design Quality',
- Policy LP 2 'Building Heights'
- Policy LP 3 'Designated Heritage Assets'
- Policy LP 4 'Non-Designated Heritage Assets'
- Policy LP 5 'Views and Vistas'
- Policy LP 6 'Royal Botanic Gardens, Kew World Heritage Site'

Historic England guidance on the setting of heritage assets

- 4.38 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. The document provides 'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG)'.
- 4.39 The guidance echoes the definition of 'setting' in the NPPF as 'the surroundings in which [the asset] is experienced' and continues: 'its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.
- 4.40 The guidance provides, at Paragraph 12, a step-by-step methodology for identifying setting, its contribution to the significance of a heritage asset, and the assessment of the effect of proposed development on that significance:
- Step 1: identify which heritage assets and their settings are affected;
 - Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
 - Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
 - Step 4: explore the way to maximise enhancement and avoid or minimise harm;

- Step 5: make and document the decision and monitor outcomes.

4.41 The document then sets out how the step-by-step methodology is used and considers each step in more detail.

5 The proposed scheme and its effect

Introduction

- 5.1 The proposed scheme for the Site is illustrated in the drawings and Design & Access Statement prepared by Rolfe Judd Architects.
- 5.2 This section of the report describes the proposed scheme in terms of its effect on the heritage significance of the site and its context, described and analysed earlier in this report.
- 5.3 A summary of townscape and heritage effects is provided in this section. A detailed assessment of the townscape and heritage effects of the proposed scheme in a series of townscape view is provided in the next section of this report. This section should be read with the next section of the report.

The proposed scheme

Overview

- 5.4 The proposed scheme will see the conversion of the former hospital complex for residential use, with part of the site on Evelyn Road being retained in medical use. The later easternmost portion of the Evelyn Road wing will be replaced. Various alterations and extensions will be made to the listed building and the Buildings of Townscape Merit to accommodate residential use. A new wing, connecting the southern and northern wings of the complex along its eastern boundary, will enclose a landscaped courtyard, beneath which will be a limited number of carparking spaces along with cycle storage.

The proposed scheme: discussion

- 5.5 The Richmond Royal Hospital site is similar to many other older hospital sites across the country that have closed or been reduced in scope in recent years. It has many of the characteristics of such sites. Its origins lie in a period – the late 19th century - where the work houses were being

replaced with the modern model of hospital care that is now familiar. An original core building was purchased, converted and extended to provide the initial accommodation. Over the next few decades, a series of further additions were made to meet expanding need and to accommodate different types of treatment. The earlier parts of the building were, at the same time, altered. Then, and particularly after WWII, the site experienced the kind of regular, small-scale, incremental change to accommodate new technologies and changes in medical practice.

- 5.6 The way that health care is provided has changed radically over the past half century. In recent times there has been a considerable contraction and consolidation in the healthcare estate. The Richmond Royal Hospital site is typical of situations where – when healthcare is planned on a metropolitan or regional level – an entire site comes to the end of its useful life providing healthcare for two principal reasons: less or no healthcare provision is required in this specific location but is needed elsewhere, and the physical accommodation is no longer fit for the purpose of delivering healthcare of a suitable quality.
- 5.7 The site, which has evident heritage significance and whose heritage significance needs to be preserved, therefore needs to find its optimum viable use. The nature of the site – originally that of a cottage, then a large house – and its surroundings suggest that residential use is the most suitable future for the site. This is reinforced by the degree of change that has occurred, giving rise to a considerable amount of flexibility to accommodate residential use. The possibility of retaining some healthcare use on the site is fortuitous, and offers the possibility of the perpetuating something of the past life of the site and the contribution that makes to its significance .
- 5.8 The proposed scheme is essentially conservative in its approach to redeveloping the site. Only a very limited degree of demolition is proposed, and this affects the part

of the site of least (if any) heritage or townscape significance. Elsewhere fabric to be removed is demonstrably either (a) not original and/or (b) considerably altered. Where significance is most present - essentially in the listed building, in the external appearance of the Buildings of Townscape Merit and to a very limited degree within the Shaftesbury Road wing – no major change is proposed.

The effect of the proposed scheme on heritage significance

The effect on the listed building

- 5.9 Pre-application discussions with the Council have established the principle of sub-dividing the listed building for residential use. Conversion to a single dwelling would be unfeasible: a dwelling of this size without a corresponding quantum of garden and amenity space would not be justifiable in commercial terms.
- 5.10 The proposal for the listed building is one that takes account of the evolution of the original house – described earlier – while minimising interruption in the existing fabric. An approach whereby individual vertical portions of the listed building become ‘houses’ has been moderated to ensure a sensible layout that creates practical and useable space. The Design & Access Statement provides detailed analysis that explains the approach taken. It shows that pursuing a vertical division of the listed building would result in a substantial degree of intervention to provide vertical circulation within each ‘house’.
- 5.11 What is now proposed represents a good fit with the listed building, both in terms of reflecting its evolution over time and in terms of what is significant in fabric and plan terms. Two units occur at basement level, one in the main section, one in the northern wing. One unit occupies the main, larger part of the listed building, apart from at the rear at the (later) mansard roof level. This allows the important main stair in the front portion of the

listed building to remain intact and without division. At ground and first floor there is a single unit in the northern wing. It is only at the uppermost level that a unit crosses between the northern wing and the main part of the house, and that occurs to the rear, in the mansard that was added later.

- 5.12 The proposed scheme for the listed building therefore offers a balance – it acknowledges the singular way in which the listed building is laid out while providing the listed building with a viable future in the form of sensibly planned residential units. In doing this, the loss of surviving fabric is reduced to the minimum.
- 5.13 Finally, it is proposed that the plaques and photographs that were previously located at ground floor of the listed building – which are now held in safe storage - will be relocated within the site in a location to be agreed with the Council.

The effect on locally listed buildings

- 5.14 It is inevitable that, in order for the site to be developed so as to start the next phase of its life and to accommodate its optimum viable use, various changes must be made. The rear elevations of the Buildings of Townscape Merit are the least sensitive in heritage and townscape terms and, in the case of the Shaftesbury Road wing, where most external change has occurred. Their interiors have little or no significance – the only notable internal features within the Buildings of Townscape Merit are two faience fireplaces and some columns within the Shaftesbury Road wing and these will be incorporated in the special architectural or historic interest.
- 5.15 When viewed from the surrounding context, the appearance of the Buildings of Townscape Merit and the contribution they make to their surroundings and the conservation area will be preserved.

The effect on the conservation area

- 5.16 It is proposed to rebuild the easternmost part of the Evelyn Road wing, and add a set-back storey at roof level. The newly built elements have been designed to read with and complement the earlier part of this wing, dating from the inter-war period. The wing on Evelyn Road will thus present itself in an integrated way, with a consistent appearance along its length and thus improving the presently somewhat disjointed nature of this wing.
- 5.17 The townscape views demonstrate that the additional height of the proposed scheme is modest and its design causes it to be subservient and recessive. The view westwards on Evelyn Road is considerably improved by the replacement of the clumsy blank 1990s gable wall with a fenestrated elevation, carrying the 'moderne' aesthetic of the interwar building around and into the new mews lane created by the lower courtyard block.
- 5.18 The character and appearance of the conservation area is essentially – with the notable exception of the Richmond Royal Hospital site – domestic. It consists of streets of relatively small houses. The use of the site will complement this character, while the design of the scheme will preserve the important difference of the site from its surroundings. The removal of more recent changes and the enclosure of the courtyard will represent an enhancement of the site over its present appearance.
- 5.19 That said, it is certainly the case that – from the vast majority of the conservation area – no change will be discernible. The changes that are proposed will have a minimal visual effect and are perceptible only in a very limited way from a small number of viewing positions.

The effect on other heritage assets

- 5.20 There will be no effect whatsoever from the proposed scheme on the UNESCO World Heritage Site of the Royal Botanic Gardens, and – for the reasons given above – the effect on the Old Deer Park Conservation Area and the

Royal Botanic Gardens registered landscape will, effectively, be negligible.

Conclusion

- 5.21 The Richmond Royal Hospital site needs a future. Its heritage and townscape significance will deteriorate without intervention to ensure that this significance has a means of being sustained for the long term. That implies a use that will provide a means of doing this, and this, in turn, implies that change must occur.
- 5.22 The changes that are proposed are, when taken together and assessed both individually and cumulatively, positive. When the level of significance in the various parts of the site and its surroundings is measured against the degree of intervention proposed, the proposed scheme achieves the correct balance of preservation of interest – whether ‘special architectural or historic interest’ or the local interest of Buildings of Townscape Merit – that is required by law, policy and guidance. By having either a positive effect, or no effect at all, the proposed scheme will preserve and enhance the listed building on the site, the setting of other listed buildings, the Buildings of Townscape Merit, the Kew Foot Road Conservation Area and other heritage assets.

6 Townscape, heritage and visual impact assessment

Introduction

- 6.1 This section of the report assesses 5 townscape views of the site, analysing the as-existing situation and what is proposed.
- 6.2 The photography and visualisation work was undertaken by AVR London. The majority of the views illustrate the proposed scheme in wire line; five images are rendered. An explanation of the methodology for the production of an Accurate Visual Representation (AVR) is provided with the application, along with larger-scale images. The photographs here are at a small scale; this section of the report should be read with the larger images.
- 6.3 In each view, the existing situation is described and the proposed development is then shown and assessed - as proposed in isolation, and in terms of the cumulative effect of the scheme with other proposed developments.
- 6.4 The text below should be read in conjunction with the analysis contained in Sections 5 and 7.
- 6.5 The commentary should be read as a whole. Certain descriptions are not repeated where the same townscape or heritage characteristics or features appear more than once in the views, and the text cross-refers to other views.

Assessment methodology

- 6.6 An analysis of the area around the site has been undertaken to understand the impact the development is likely to have on key heritage and townscape features and heritage assets. This includes: urban form, character and architectural quality, the presence of heritage assets, scale and massing, public realm, permeability and linkages, continuity and enclosure.

- 6.7 A combination of desktop study and fieldwork has been used to determine the significant views of the development.
- 6.8 After initial desktop work and fieldwork, key representative viewpoints has been subject to verified photomontage simulations to enable an accurate assessment of the visual impact of the buildings on an existing view. In this report, the assessment of the impact of the proposals on townscape and heritage significance is focussed principally on an assessment of the wirelines and CGIs.
- 6.9 Given the nature of the proposals, the scope of the assessment has had regard to Historic England guidance on the setting of heritage assets and tall buildings.

Impact criteria

- 6.10 The magnitude of change to townscape and heritage receptors is measured as follows:
- ‘Negligible’ – no material change;
 - ‘Minor’ - changes that only make a small difference to the ability to understand and appreciate the historic context or townscape setting. A minor impact may also be defined as involving receptors of low sensitivity exposed to intrusion, obstruction or change of a low to medium magnitudes for short periods of time.
 - ‘Moderate’ - a change that makes an appreciable difference to the ability to understand the historic context or townscape setting. A moderate impact may also be defined as the result of moderately sensitive receptors exposed to intrusion, obstruction or change of a medium magnitude, or highly sensitive receptors exposed to intrusion or change of a low magnitude.

- ‘Major’ - a fundamental change in the appreciation of the resource and historic context or townscape setting. A substantial impact may also be defined as the result of highly sensitive receptors exposed to intrusion, obstruction or change of a high or medium magnitude for prolonged periods.

6.11 The impact of proposals on townscape receptors is measured as follows:

- ‘Neutral’: there is negligible or no impact;
- ‘Beneficial’: the impact of the development is to improve the condition or circumstances of the townscape receptor
- ‘Adverse’: the impact of the development is to harm the condition or circumstances of the townscape receptor.

View 1: Evelyn Terrace

Existing



- 6.12 This viewing position is on the western side of Evelyn Terrace, opposite No 6, and on the western boundary of the Kew Foot Road Conservation Area. The view looks south towards the locally listed (Building of Townscape Merit) northern wing of the Richmond Royal Hospital site, north of the main listed building on Kew Foot Road and at the junction with Evelyn Road. The hospital site, even in this narrowly focussed street view, is discernibly different from the more residential character and appearance of the foreground, and its architecture is recognisably institutional.

Proposed



- 6.13 The proposed dormers in the roof slope of the northern wing represent the only, and very minimal change in this view. The dormers have been designed to blend with the traditional appearance of the roof and the building.
- 6.14 The magnitude of change in townscape terms is *Minor*, and the effect is assessed as *Neutral*.

View 7: Evelyn Road 1

Existing



- 6.15 This is the first of a series of three viewing positions on Evelyn Road, within the Kew Foot Road Conservation Area, and is located on the northern pavement, approximately outside No 11 Evelyn Road. The view looks west towards the site and shows the varied architectural character of the residential street, with different styles of house from various periods along the length of the street; the gabled houses on the left are in marked contrast to the terraced ground on the right. All the buildings on the right hand side of Evelyn Road are locally listed. The view shows the blank gable wall of the northern wing on Evelyn Road; its harsh geometry detracts from the view and this part of the conservation area. There is a clear sense of a large scale institution building at the western end of Evelyn Road.

Proposed



- 6.16 The proposed scheme very significantly improves the townscape quality in the view. The inappropriate shape, profile and materiality of the existing gable wall and modern extension to the hospital complex is replaced with a new part of the site that is clearly in keeping with the interwar part of the northern wing beyond. The top most part of the new work is well set back and visually recessive. The materiality of the proposal is in keeping with its surroundings.
- 6.17 The magnitude of change in townscape terms is *Moderate*, and the effect is assessed as *Beneficial*.

View 8: Evelyn Road 2

Existing



- 6.18 This viewing position is closer to the site than the previous view, and is located outside No 19 Evelyn Road. In addition to the blank gable of the northern wing, the 1980s rehabilitation unit is now visible on the left. The greater scale of the older interwar part of the northern wing is evident just beyond.

Proposed



- 6.19 In this closer view, the stepping of the eastern elevation of the new build element becomes clearer as one of a number of ways in which the proposal acknowledges the scale and character of its context. The lighter metal treatment of the set-back top floor is also clear. As in the previous views, the perspective of the pedestrian viewer means that the scale of the proposal is consistent with that of the street. Though it is taller, when viewed in the normal fashion of someone using the streets around the site, the proposed scheme sits comfortably in the streetscape and respects the overall character and appearance of the conservation area.
- 6.20 The magnitude of change in townscape terms is *Moderate*, and the effect is assessed as *Beneficial*.

View 9: Evelyn Road 3

Existing



- 6.21 The last of the three views on Evelyn Road shows the northern wing with the awkward gable termination at its eastern end. The rehabilitation unit is on the left. Between, the rear parts of the Kew Foot Road part of the complex is just visible – the Grade II original building on the right and the locally listed southern wing on the left.

Proposed



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Alignment based on Zmap Data

1.6 m above ground

11:18 07 Aug ust 2018

- 6.22 The very significant improvement caused by the proposed scheme in this view is overwhelmingly clear – the proposal is of evidently higher architectural quality than the existing building and considerably improves townscape quality. The careful acknowledgement of the interwar portion of the north wing beyond is clear at this distance, and from this viewing position, the set-back top storey is not visible.
- 6.23 The magnitude of change in townscape terms is *Major*, and the effect is assessed as *Beneficial*.

View 14: Shaftesbury Road

Existing



- 6.24 This viewing position is opposite the southern vehicular entry to the site. The full extent of the southern wing, on the left of the view is locally listed, as are nearly all the properties on Shaftesbury Road. The 1908 Ophthalmic Wing is visible in the distance on the left, with the 1904 out-patients building in the centre-left of the view. It is terminated by the same clumsy stair core as occurs at the eastern end of the northern wing, just visible in the distance on the centre-right, with Evelyn Road beyond.

Proposed



- 6.25 The proposal preserves the open view through to Evelyn Road while providing new accommodation in a respectful and contextual fashion. The new development leads the eye through the view, and is of a scale and design that allows it to form a suitable interface with the existing housing to the right. The view shows subtle amendments to the 1904 building, though the rooftop mansard alterations and other proposals beyond are not visible. This proposal, like the new part of the northern wing visible beyond, replaces the ugliness of the existing stair cores.
- 6.26 The magnitude of change in townscape terms is *Major*, and the effect is assessed as *Beneficial*.

Conclusion

- 6.27 The proposed scheme will bring about a clear improvement in the quality of the townscape in and around the application site over the present situation. It will very considerably enhance the condition and appearance of the site over its present state, replacing the poor-quality incremental interventions that occurred in recent decades. The townscape views illustrate a considered and holistic scheme that responds appropriately to its context in terms of scale, massing and architectural expression.

7 Compliance with policy and guidance

- 7.1 This report has provided a detailed description and analysis of the site and its heritage context, as required by the National Planning Policy Framework. In addition, the report also describes (in Section 5 ‘The proposed development and its effect’) how the proposed scheme will affect that heritage significance. The effect is positive, and for that reason, the scheme complies with policy and guidance. This section should be read with Sections 4 and 6.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 7.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed scheme preserves the special architectural and historic interest of the listed buildings and conservation areas affected by the development. The proposed development thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 7.3 It is important to note that the legal requirement regarding satisfying Section 72(1) of the Act was established by *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573 and is met if the proposed development leaves conservation areas unharmed. We believe that it would be difficult to characterise the proposed scheme as doing anything less than leaving the conservation areas in question unharmed.

The level of ‘harm’ caused by the proposed scheme to heritage assets

- 7.4 As outlined in Section 5, the NPPF identifies two levels of potential ‘harm’ that might be caused to a heritage asset by a development: ‘substantial harm...or total loss of significance’ or ‘less than substantial’. Both levels of harm

must be caused to a *designated* heritage asset – in this case, the listed buildings, conservation areas, the registered landscape and the World Heritage Site.

7.5 The only potential for ‘substantial’ harm would be if the proposed scheme for the site caused the loss of something *central* to the special interest of these heritage assets. The proposal evidently does not give rise to this level of harm. We do not believe that any ‘less than substantial harm’ is caused by the scheme.

7.6 In any event, the public and heritage benefits of the proposed scheme more than outweigh any very low - and non-material - level of ‘less than substantial harm’ that *might* be asserted as being caused by the proposed development.

The National Planning Policy Framework

7.7 This report has provided a detailed description and analysis of the significance of the Richmond Royal Hospital and its heritage context, as required by Paragraph 189 of the National Planning Policy Framework.

7.8 The proposal satisfies Paragraph 192, sustaining and enhancing the heritage significance of the Richmond Royal Hospital putting it to viable uses consistent with the conservation and enhancement of that significance. The scheme also makes a sustainable and positive contribution to the community and economic vitality of this part of Richmond.

7.9 The proposed scheme complies with Paragraph 193 and 194 of the NPPF in that it conserves the heritage assets in question. We do not believe that the scheme involves any ‘less than substantial harm to the significance of a designated heritage asset’, but any such ‘less than substantial harm’ that *may* be ascribed to the scheme is greatly outweighed by the public and heritage benefits generated by the scheme in terms of helping to sustain the site in its ‘optimum viable use’ over the long term, satisfying paragraph 196.

- 7.10 The proposed development certainly ‘enhances and reveals the significance of the heritage asset/the setting of heritage/preserve those elements of the setting that make a positive contribution to the asset’ as required by paragraph 200.

The London Plan

- 7.11 The proposed scheme for the Site is exactly what the London Plan envisages when it talks (in Policy 7.4) about developments having ‘regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings’. The design of the proposed scheme is inherently responsive to its urban context, including the setting of the listed buildings and conservation areas in its vicinity. The proposed scheme is of ‘the highest architectural quality’. The scheme thus complies with Policy 7.4. The proposed scheme adds life and vitality to the setting of heritage assets, whereas until recently, the area to the east of the conservation area was lacking in life and activity. The scheme clearly ‘conserve[s] the significance of heritage assets’. For these reasons, the scheme is consistent with Policy 7.8 of the London Plan.
- 7.12 It is also consistent with Policy 7.9 of the Plan – the ‘significance’ of the heritage assets in its context has been ‘assessed’ and the scheme is ‘designed so that the heritage significance is recognised both in [its] own right and as [a] catalyst for regeneration’.

Local Policy: Richmond Upon Thames Council’s Local Plan

- 7.13 In satisfying the NPPF and the London Plan, the proposed scheme also satisfies Richmond Upon Thames’s local policies for architecture, urban design and heritage assets.

Historic England guidance on the setting of heritage assets

7.14 The step-by-step methodology provided in Historic England's Historic Environment Good Practice Advice in Planning Note 3 is addressed as follows:

- *Step 1: identify which heritage assets and their settings are affected:*

This is done in Section 3 of this report and in the Visual Impact Assessment contained in Section 6.

- *Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s):*

This is discussed in Sections 3 and 6 of this report

- *Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance:*

This is undertaken in Sections 5 and 6 of the report

- *Step 4: explore the way to maximise enhancement and avoid or minimise harm:*

This formed part of the design process and pre-application discussions with the local planning authority, and the design has evolved to respond to pre-application advice.

- *Step 5: make and document the decision and monitor outcomes:*

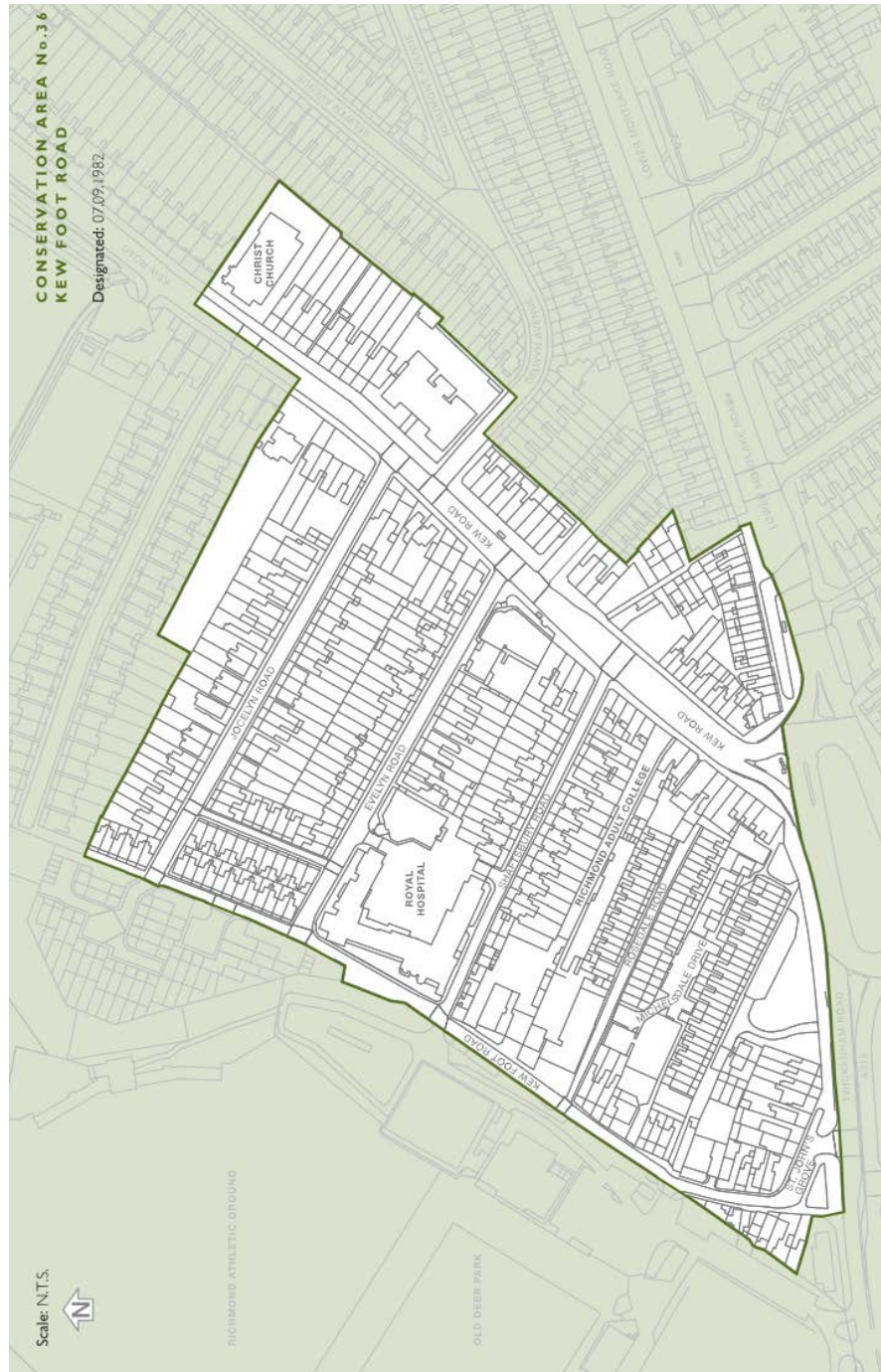
The submission documents, in particular the Design & Access Statement, and this report record the scheme as amended following design development prior to an application for planning permission being made.

8 Summary and conclusions

- 8.1 The report describes the site and its surroundings as it is found at present. Sections 2 and 3 set out a history of Richmond Royal Hospital site and its surroundings, identify the heritage and townscape receptors in the vicinity, and assesses townscape and heritage significance. The proposed scheme and its effect is assessed in Sections 5 and 6; Section 6 assesses the effect of the proposed scheme in a series of five townscape views.
- 8.2 The report concludes that there will be a clear improvement in the quality of the townscape in and around the application site over the present situation. The proposed scheme will very considerably enhance the condition and appearance of this key site over its present state. The scheme will see the repair and reuse of the designated and non- designated heritage assets that make up the site, and sustain their heritage significance over the long term.
- 8.3 The design of the proposed scheme has been developed through pre-application discussions and adjustments made to ensure that the significance of both the listed building and locally listed buildings is enhanced. The massing and architectural treatment of the new elements of the proposed scheme serve to mitigate its overall scale when seen in townscape views. The scheme brings with it many architectural, townscape and economic benefits.
- 8.4 Section 7 demonstrates how the proposed development will comply with legislative, policy and guidance. We believe that the development will preserve the setting of designated heritage assets, and it therefore complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It also preserves the setting of non-designated heritage assets. The proposed scheme is consistent with the urban design and heritage policies of the National Planning Policy Framework, with the

London Plan and with Richmond Upon Thames's Local
Plan.

Appendix A: Kew Foot Road Conservation Area



London Borough of Richmond upon Thames, Kew Foot Road (36) Conservation Area Statement ©

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