

75-81 George Street, Richmond



Townscape, Heritage and Visual Impact Assessment

KM Heritage

7/12/2019

House of Fraser, 75-81 George Street
Richmond, TW9 1HA

Townscape, Heritage and Visual Impact Assessment

July 2019

Consultancy for the
Historic Built Environment

KMIHeritage

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1 Introduction

1.1 This report has been prepared by KMHeritage to support planning and listed building consent applications submitted to the London Borough of Richmond Upon Thames for limited works to the House of Fraser store at 75-81 George Street (including Nos. 4, 6 & 8 Paved Court and 20 King Street), TW9 1HA.

1.2 The application seeks planning permission for a roof extension to the existing department store building together with a rear extension at 2nd floor levels and new roof plant; a remodelled entrance on Golden Court providing access to the upper floor office accommodation; a remodelled secondary entrance at No. 4 Paved Court along the line of the existing shopfront; a new rooflight and glazed stair enclosure to form an atrium type space within the existing enclosed courtyard; new fenestration to the main store building; and Portland Stone cladding to the ground elevation with new stone fascia to replace the existing canopy. The proposed use of the extended building will be for retail, office and leisure purposes.

Purpose

1.3 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.

1.4 This report should be read in conjunction with the drawings and Design & Access Statement prepared by Colman Architects along with other application material.

Nomenclature

1.5 The property, House of Fraser, 75 -81 George Street (including Nos. 4, 6 & 8 Paved Court and 20 King Street) is referred to as the 'site' throughout this report

1.6 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

- 1.7 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

- 1.8 Assessment for this report has been carried out by Bridin O'Connor MPhil. Bridin is a town planner with over 35 years' experience. She has worked for a number of London Local Authorities largely in Development Management. Her experience has been focussed on large scale regeneration within established urban and historic settings.
- 1.9 Historical research and drafting of this report has been carried out by Anne Roache MA. Anne is a researcher with over 25 years' experience. She has worked for leading commercial organizations in the fields of property, planning and law. Anne has a specialisation in the archaeology, architectural and social history of London.

2 The site and its surroundings

Location

- 2.1 Richmond is a district of south-west London, approximately 8 miles south-west of Charing Cross. It is located on the south side of the River Thames and is characterised by a large number of parks and open spaces, including Richmond Park, Richmond Hill, The Old Deer Park and Kew Gardens. The district gives its name to the London Borough of Richmond upon Thames.
- 2.2 The site is located in Richmond town centre (fig. 1). George Street is predominantly retail and commercial in nature with a mixture of 18th-20th century buildings.



Figure 1: The site (Source: Google Maps)

A brief history of the site and its surroundings¹

- 2.3 The area of present day Richmond town was originally known as Sheen and was, from the medieval period, a favourite place of residence for royalty. A palace stood facing the River Thames with a hunting ground, now known as the Old Deer Park, attached to the north of it. After the old palace was destroyed by fire, Henry VII, in 1501, rebuilt it in a much grander style renaming the manor 'Richmond', after his earldom of Richmond in Yorkshire. Henry VII died here in 1509

¹ Largely taken from Malden, H.E. (ed.) (1911) 'Parishes: Richmond (anciently Sheen)', A History of the County of Surrey: Volume 3, pp. 533-546. British History Online: www.british-history.ac.uk/vch/surrey/vol3/pp533-546

and later that same year, his son Henry VIII spent Christmas there with his new queen, Katharine of Aragon. Elizabeth I favoured the palace and was to die there in 1603. Royal patronage made Richmond an attractive place for the Court leading to the growth of housing and Inns around The Green.

- 2.4 The palace suffered dilapidation during the Commonwealth period and after the Restoration of Charles II in 1660 it passed through several owners until by 1703 its remains were divided to create several houses and tenements. Richmond town grew up for the most part to the south and east of the site and today there is little to show of the palace, the most conspicuous remains being those which are part a house facing Richmond Green and the gateway to Wardrobe Court, with its upper chamber forming part of the house. The street names here are also a reminder - Old Palace Lane, Old Palace Yard and The Wardrobe.
- 2.5 During the 18th century, substantial houses were erected on the western and south east sides of The Green. The Grade I listed terrace known as Maids of Honour Row was built in 1724 for the maids of honour of Queen Caroline, the queen consort of George II. Figures 2 and 3 show the town at the time of Rocque's survey of 1761.² The ferry has yet to be replaced by the new bridge and development is centred around The Green. George Street is in place as is Petersham Road, Richmond Hill, Hill Street and the beginnings of King Street and ribbon development can be seen along these thoroughfares.

² *'An exact survey of the city's of London Westminster y.e borough of Southwark and the country near ten miles round / begun in 1741 & ended in 1745 by John Rocque land surveyor & engrau'd by Richard Parr'* Published 1761. © University Library Berne via www.oldmapsonline.org



Figure 2: Richmond Town, Rocques map of 1761



Figure 3: Detail of Richmond Town, Rocques map of 1761

- 2.6 An increase in population saw development spread north of The Green during the 18th and 19th centuries. Richmond Bridge which was completed in 1777 prompted further development

north and east of it. The first edition OS published in 1856 shows this development (fig. 4³)

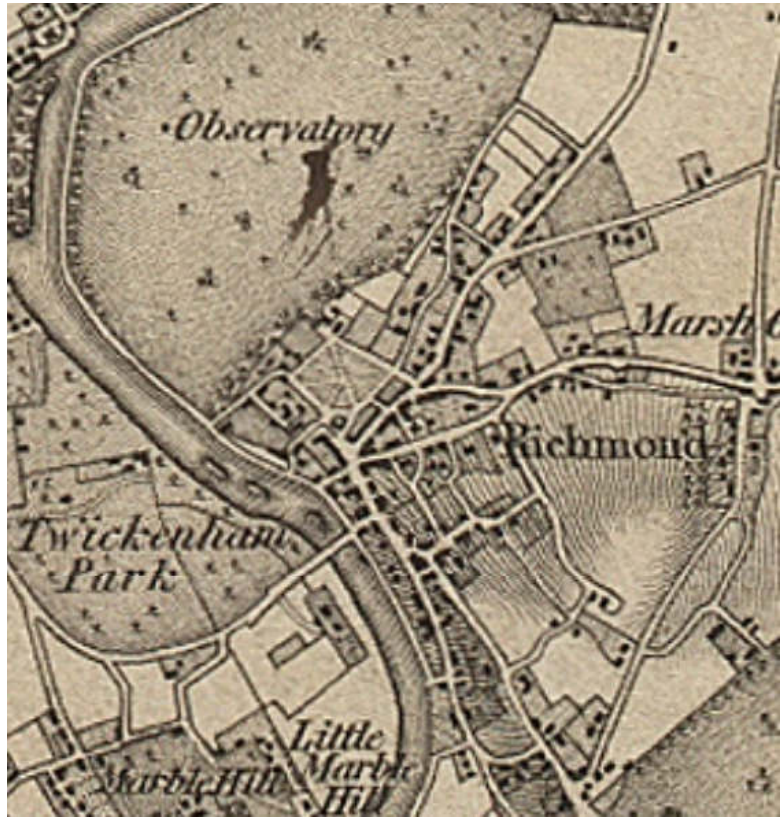


Figure 4: Richmond town centre, OS 1856

- 2.7 In the middle of the 19th century Richmond was still called a village, although it was then said to resemble a town in all respects. After the railway to London was opened in 1846, development accelerated and saw the population increase from 9,255 in 1851 to 25,577 in 1901. The latter part of the century saw the erection of substantial villas around The Green's northern and eastern sides (fig. 5⁴).

³ Source: www.VisionofBritain.org.uk. Copyright (c) 2004-2015 of the Great Britain Historical GIS Project and the University of Portsmouth. This work is licensed under the Creative Commons Attribution 4.0 International License.

⁴ OS London (Edition of 1894-96) CX (Heston and Isleworth; Richmond; Twickenham St Mary The Virgin) Revised: 1893 to 1894, Published: 1897.



Figure 5: Richmond Town Centre, Revised: 1893 to 1894

- 2.8 The construction of the railway in the mid-19th century had cut the town off from the Old Deer Park and in the 1920s, the construction of the A316 road further increased this separation (fig. 6⁵).



Figure 6: Richmond Town Centre, OS revised 1938

- 2.9 Today, The Green is largely residential in nature, whilst in the southern corner, by Paved and Golden Courts – two of a number of alleys that lead from The Green to George Street, is a cluster of public houses and cafés. This area of Old Richmond

⁵ OS Middlesex XX.SE (includes: Ham; Heston and Isleworth; Petersham; Twickenham St Mary the Virgin.) Revised: 1938, Published: 1947.

is essentially 18th century in character with many surviving examples of good Georgian workmanship.

- 2.10 The London Borough of Richmond upon Thames was created in 1965 by the amalgamation of the Municipal Boroughs of Twickenham (Middlesex), Richmond (Surrey) and Barnes from (Surrey). It is the only London borough that straddles both sides of the River Thames. Primarily residential in character, it is known for its open spaces - nearly two-fifths of its area is maintained as public open space – which includes Richmond and Bushy parks, Barnes Common, Sheen Common, Ham Common, Marble Hill Park, and Old Deer Park. Kew Gardens, the internationally renowned botanical garden is on the site of the former royal estate and is a UNESCO World Heritage site.

The evolution of the House of Fraser department store⁶

- 2.11 The façade of the House of Fraser department store dominates the southern end of George Street and the corner with King Street. It's origins lie in an older retail emporium 'Gosling's'. In October 1795, J.H. Gosling founded a drapery store at No. 80 George Street. As trade increased, Nos. 75, 76, 77, 78 and 79 George Street were incorporated into the store. In April 1957, Gosling & Sons Ltd⁷ was acquired by John Barker & Co Ltd, a subsidiary of House of Fraser Ltd. Over the years they expanded into neighbouring shops and even bought the Queen's Head Hotel (No. 81), which stood at the corner of George and King Streets.
- 2.12 The OS map revised: 1893 to 1894 shows the block of the current site with Paved Court running NE-SW between King Street and The Green. Its small units can be clearly seen. Golden Court – previously known as Channons Row and Pensioners Alley - is not a through route at this point having a building at either end at each street frontage (fig. 7⁸).

⁶ House of Fraser archive, online: www.housefraserarchive.ac.uk

⁷ The company was officially liquidated in 1974.

⁸ OS London (Edition of 1894-96) CX (Heston and Isleworth; Richmond; Twickenham St Mary The Virgin) Revised: 1893 to 1894, Published: 1897.

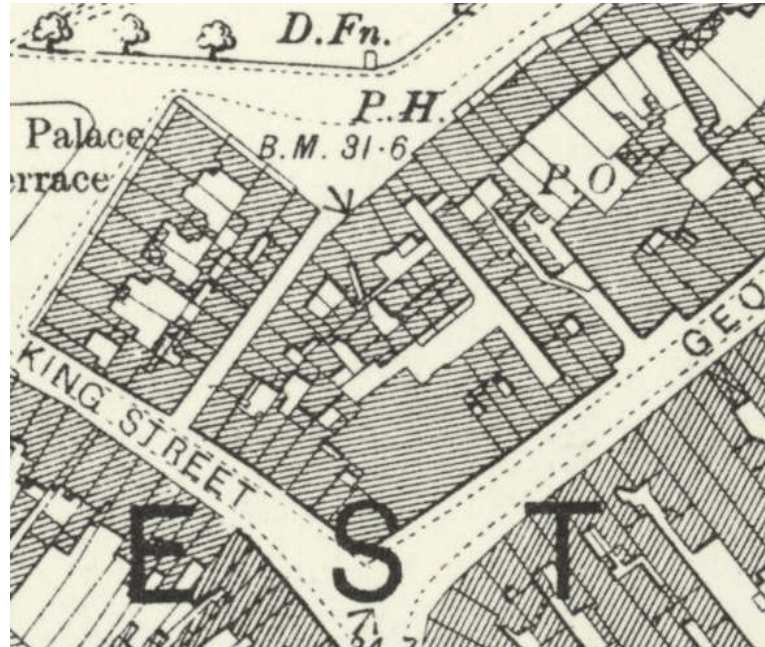


Figure 7: The site, Richmond Town Centre, OS revised: 1893-94

- 2.13 By the time of the OS map of 1933, Pensioners Alley has been opened up to create a through route and renamed Golden Court. Some of the rear extensions and infill behind Paved Court and the Prince's Head public house have been consolidated. Gosling's Store on George Street has expanded to the east subsuming three separate premises (fig. 8⁹).

⁹ OS Surrey VI.4 (Heston and Isleworth; Petersham; Richmond; Twickenham St Mary The Virgin) Revised: 1933, Published: 1936

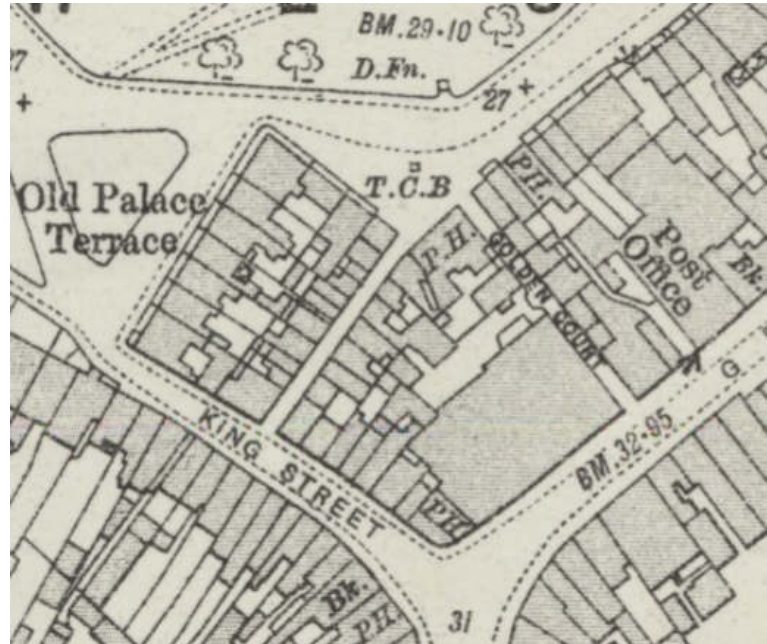


Figure 8: The site, Richmond Town Centre, OS revised: 1933

- 2.14 An aerial photograph shows the site in 1930 and illustrates the ad hoc, yet open arrangement of the various rear extensions to Paved Court. The uniform elevation, covering George Street and Golden Court was built in the early 20th century (fig. 9¹⁰).



Figure 9: The site from the air, 1930

- 2.15 The 1959 OS shows further consolidation and extension of the rear elements of the site although a large open area remains. In particular No. 4 Paved Court has been extended; an extension to No. 6 has been reconfigured to span the width of Nos. 6 & 8.; No. 10 has been extended to join up with No 22 King Street as

¹⁰ Britain From Above. EPW031991 (1930) © Historic England. Reproduced under licence.

one premises; and Nos. 12 & 14 remain unaltered. Gosling's store retains the same footprint, (fig. 10¹¹).

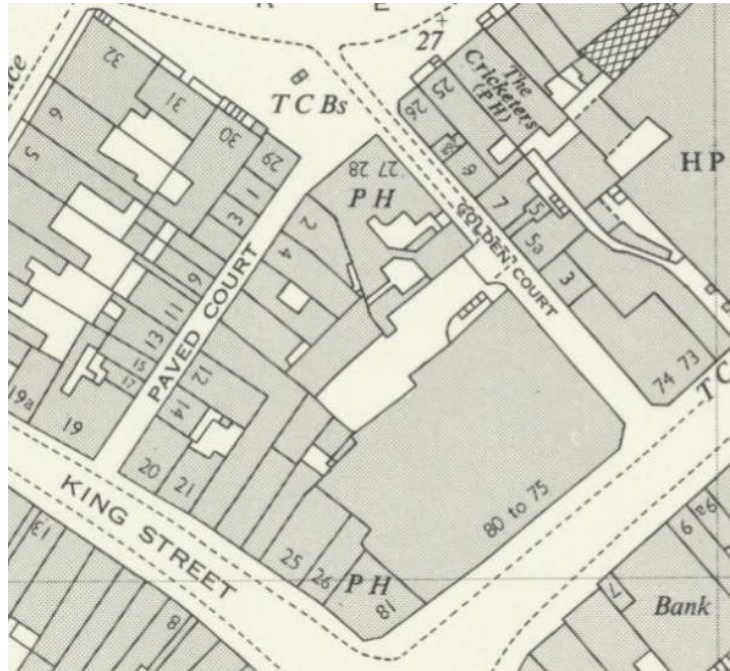


Figure 10: The site, Richmond Town Centre, 1959

- 2.16 Gosling's store was badly damaged by fire in 1962 and eventually demolished in 1968. Photographs from the period show the environs around this time, including the public house premises at No. 81 George Street which had been taken over by the store (fig. 11¹²).

¹¹ OS TQ1774NE - A (includes: Heston And Isleworth; Richmond; Twickenham St Mary The Virgin) Surveyed: 1959, Published: 1960.

¹² © London Metropolitan Archives Collage ref: 165690. Reproduced under licence.



Figure 11: Goslings, 80 & 81 George Street (former public house),
1967

2.17 A number of late 17th century premises on the south side of Paved Court had been taken over by Goslings and most of these were listed Grade II in 1968 (along with many in the north side) (figs. 12-14¹³).



Figure 12: Paved Court, looking north east, 1966

¹³ © London Metropolitan Archives Collage refs: 163028/163027/163042. Reproduced under licence.



Figure 13: Paved Court, looking south west, 1966



Figure 14: Nos. 2-14 Paved Court looking south west, 1968

- 2.18 After Gosling's was damaged, the owners put in for planning to rebuild a new, modern store on the site. The first application for 'Goslings site George Street and King Street Richmond' was granted in February 1966, for the 'renovation of and additions to existing department store'. This was followed at the end of that year by an application for permission for '75-78 & 81

George Street, 2-10 & 14 Paved Court and 20-26 King Street' for a 'department store on 4 floors, with a tank room on roof, providing a total floor area of 83,863ft². Permission was granted in December 1966.¹⁴

- 2.19 In August 1966 permission was granted in relation to Nos. 6-8 Paved Court for 'Alterations and remedial work to the buildings at 2, 4, 6, 8, 10 and 14 Paved Court, and 20, King Street comprising Phase II of the approved redevelopment proposals for Goslings store'.¹⁵
- 2.20 The architect of the new store was Stanley Gordon Jeeves (1887/8-1964). An 'eminent and prolific architect who collaborated on many landmark buildings in London, including Palladium House, Great Marlborough Street; Berkeley Square House; the Earls Court Exhibition Centre and large blocks of flats such as at Dolphin Square'¹⁶ as well as a rebuild of Arnott Simpson's Department Store in Glasgow for House of Fraser. Four of his developments are on the National Register of Listed Buildings.
- 2.21 The old store was demolished in 1968 and House of Fraser opened a Dickens & Jones store on the site in 1969. The shopfronts of the listed properties on Paved Court owned by House of Fraser were refurbished. In the case of No. 4, the whole elevation including first floor windows and shopfront was completely changed (fig. 15¹⁷).

¹⁴ London Borough of Richmond Council Planning application ref: 66/0048 & 66/1145.

¹⁵ London Borough of Richmond Council Planning application ref: 66/1145/LBC

¹⁶ 20th Century Society: <https://c20society.org.uk/casework/a-tale-of-two-cities>

¹⁷ © London Metropolitan Archives Collage ref: 163104. Reproduced under licence.



Figure 15: No. 4 Paved Court – (i) 1968, before shopfront and windows were replaced and (ii) 1972 after refurbishment

2.22 In 1975/6, the two basements were redeveloped to create a lower ground area sales floor and, at the same time, the ground floor was completely refurbished. The store continued to trade under the name Dickins & Jones until 2007, when it was rebranded as a House of Fraser store

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

The heritage context of the site

Conservation areas

- 3.1 The site straddles two Conservation Areas – the main store building is within the Central Richmond Conservation Area (17), and Nos. 4-8 Paved Court and 20 King Street are within the Richmond Green Conservation Area (3). The boundary between both conservation areas runs along the south boundary of Paved Court properties. Both were designated in January 1969. Both CAs are bounded on their northern edge by the Old Deer Park Conservation Area (57) and adjoin Richmond Riverside CA (4) to their west. A map of the central area conservation area boundaries can be seen in figure 16.

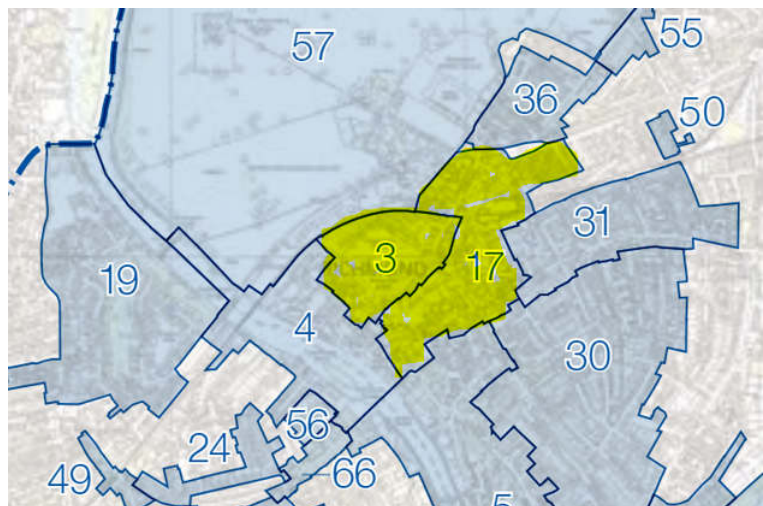


Figure 16: Conservation Areas in central Richmond

Richmond Green Conservation Area

- 3.2 The Richmond Green Conservation Area was designated in January 1969 and extended in November 2005. The character of the Conservation Area is dominated by The Green at its centre. The Richmond Green Conservation Area statement describes it as:

‘A fine example of an early urban green with a feeling of formal elegance and provides a fittingly grand setting for the houses that surround it. Little built form intrudes into the sky above the surrounding buildings emphasising the inward looking, almost isolated feel of the space.

The scale of the development surrounding The Green is predominantly two and three storey. Varying numbers of bays, bay widths and changes in roof and window levels accentuate the individuality of each building within the whole pattern.

Narrow alleyways leading to George Street in the town centre and to the river provide contrast to the openness of The Green and glimpses outside the area emphasise the relationship with both river and town.'

3.3 Opportunities for Enhancement are noted as including:

- Improvement and protection of landscape views, skylines and landmarks;
- Improvement of highways conditions and pedestrian convenience, and rationalisation of existing signage and street furniture;
- Retain and improve the quality of shopfronts and advertisement.

The Central Richmond Conservation Area

3.4 The Central Richmond Conservation Area was designated in January 1969 and extended numerous times, most recently in November 2005. The Conservation Area statement describes it as:

'Mainly a commercial shopping area and the townscape is noteworthy for its variety, with a consistently high quality and many exuberant individual buildings. There are also residential areas of mainly terraced development.

Building heights vary from two to five storeys and roof treatments vary. In general, the greatest virtue and benefit of the existing townscape is that no one building dominates and that the larger buildings do not spoil the appearance of the centre.

The area is threaded by several small lanes leading into the historic Richmond that lies behind the 19th century commercial redevelopment. These lanes, Brewer's Lane, Golden Court, Waterloo Place, Church Court, Victoria Place, Mitre Court and the Market Passage, provide a refuge from traffic and are spaces of a more intimate nature.'

3.5 Opportunities for Enhancement are noted as including:

- Improvement and protection of its setting;

- Preservation, enhancement and reinstatement of architectural quality and unity;
 - Retain and improve the quality of shopfronts and advertisement;
 - Areas identified for environmental improvement include: Railway station forecourt, The Quadrant and George Street.
- 3.6 'The Central Richmond, Richmond Green and Richmond Riverside Conservation Area Study' was published in January 2001.
- 3.7 The Study describes George Street as having 'a strong sense of enclosure with the view closed at either end by distinctive buildings'. It describes the view south along the street as 'less inspiring, dominated by the Dickens & Jones Building¹⁸ and the current Post Office. Both are bland and of poor design quality and an unfortunate and unsuitable focus for this vista.'
- 3.8 Paved Court is described as 'one of the most picturesque alleys in the town centre comprising many good quality shopfronts. Leading from King Street it emerges into a small open space by the Princes Head PH [...] the quality of the buildings facing it gives the space a human scale and a degree of tranquillity'.
- Listed buildings
- 3.9 Part of the site - comprising Nos. 6 & 8 Paved Court and 20 King Street - is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for special architectural or historic interest. The listing descriptions read:
- 6 Paved Court*
- List Entry Number: 1180692 Date first listed: 24-Dec-1968*
- Late C17. Two storeys and attic. Ground floor late C19 shop front. Painted brick first floor, with segmental-headed windows. Mansard roof behind parapet with one dormer.*
- 8 Paved Court*
- List Entry Number: 1065369 Date first listed: 24-Dec-1968*
- Late C17. Two storeys and attic. C19 ground floor shop front. Stuccoed first floor with one window. Roof with eaves rather*

¹⁸ Now House of Fraser.

than parapet. Window has flat head and recessed sash boxes.

20 King Street

List Entry Number: 1065374; Date first listed: 24-Dec-1968

C18 brick 3-storey building, 2 windows to first floor, one wider window to second. Later shop front. Corner building with Paved Court.

3.10 There are further statutorily listed buildings in the vicinity of the site (fig 17).¹⁹ Those most relevant to consideration include:

Grade II*:

- King Street: Old Friars, Old Palace Place, No. 18;
- Richmond Green: Nos. 1, 2-6, 32.

Grade II:

- King Street: Nos. 17, 18, 19;
- Paved Court: Nos. 10, 12, 14 (even), 3, 5, 7, 9, 11, 13, 14, 17 (odd);
- Richmond Green: Nos. 14-19 (consec), 21-25, 30, 31.



Figure 17: Listed buildings (blue triangles) in the vicinity of the site (red star)

¹⁹ National Heritage List for England: <https://historicengland.org.uk>

Locally listed buildings

- 3.11 A locally listed building (also known as a 'Building of Townscape Merit') is a building or structure which is not statutorily listed but is recognised for its significance to the history and character of the local environment.
- 3.12 There is one locally listed building within the site: No. 4 Paved Court. This property is described above in paragraph 2.21 above.
- 3.13 There are further locally listed buildings in the vicinity of the site including²⁰:
- King Street: Nos. 4-5, 8-16, 19A;
 - George Street: Nos. 1-6, 16-17, 18-20, 21, 22, 27-36, 29, 41-58, 60-62, 68-74.

Other designations

- 3.14 The Old Deer Park Conservation Area to the north of the site forms part of the Grade I Royal Botanic Gardens registered landscape²¹ which also falls within part of the Royal Botanic Gardens UNESCO World Heritage site Buffer Zone. The Old Deer Park is designated as Metropolitan Open Land. The Richmond Archaeological Priority Areas are currently under review by the GLAAS.

Assessing heritage and townscape significance: concepts and terminology

- 3.15 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'.
- 3.16 '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'.

²⁰ London Borough of Richmond upon Thames, *Buildings of Townscape Merit*.

²¹ 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'.

- 3.17 '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.
- 3.18 The conservation areas, 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 site and its context

'Evidential value'

- 3.19 The listed and unlisted structures of merit in the vicinity of the site, and their relationship to one another and the surrounding conservation areas, collectively illustrate the development of this part of London. They tell how Richmond evolved from the 16th century onwards and in particular about its transformation from the middle of the 19th century.
- 3.20 The area and its buildings are a record of social and economic change and lifestyles in various periods and illustrate the effect these things have had on building stock and urban grain. The recent history of the site provides evidence of the changes in the retail landscape in the late 20th to early 21st century.

'Historic interest' or 'Historical value'

- 3.21 The site 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 evolving use as a department store.
- 3.22 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 areas retain sufficient historic character and appearance to convey historical ethos.

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

- 3.23 The buildings contained within the site 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 statutorily and locally listed buildings within the site retain the features of the original external design that contribute to each of these qualities.

- 3.24 Taking the listed buildings fronting Paved Court; there has been a degree of external and internal additions and alterations made to accommodate various retail uses over a long period of time. Most of these changes are of modest significance in themselves.
- 3.25 In the case of the locally listed building at No. 4 Paved Court, change has occurred to the front elevation where original windows at first floor level and the shopfront have been significantly altered. Internally changes have also been made.
- 3.26 The external group appearance of the buildings situated in Paved Court, when viewed from either Richmond Green or King Street, make a positive contribution to the Richmond Green Conservation Area.
- 3.27 Taking the non-listed department store facing George Street; the building has limited merit internally however externally the building makes a striking contribution to the streetscape as a cohesive architectural form. Its' architect, Stanley Gordon Jeeves was an 'eminent and prolific architect who collaborated on many landmark buildings in London', including retail, office and residential blocks. Four of his developments are on the National Register of Listed Buildings.

Townscape significance

- 3.28 The townscape significance of the site lies in its character and appearance. The George Street elevation provides a cohesive architectural form, contrasting with the generally mixed character and appearance the rest of George Street and creating a landmark corner building seen when travelling north along Hill Street towards the junction with King Street and George Street. Paved Court maintains a consistent small scale late 18th-early 19th century appearance.

Conclusion

- 3.29 The site has evidential, historical, aesthetic and communal value in varying degrees. The listed parts of the site, including the locally listed building, possess these values to a greater

degree although significance is largely confined to their exteriors. 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 7 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 7: 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 19 February 2019.
- 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'.²²

²² 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.

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 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).²³
- 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 heritage assets, to enhance or better reveal their significance. Proposals

²³ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

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 Planning Practice Guidance provides streamlined 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’ which gives advice under the following headings:
- Overview: historic environment
 - Plan making: historic environment
 - Decision-taking: historic environment
 - Designated heritage assets
 - Non-designated heritage assets
 - Heritage Consent Processes and
 - Consultation and notification requirements for heritage related applications.

Historic England’s Good Practice Advice in Planning Notes

- 4.21 Historic England provide guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. They provide ‘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)'.

4.22 These notes are:

- GPA 1: The Historic Environment in Local Plans (2015);
- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015);
- GPA 3: The Setting of Heritage Assets (2nd ed., 2017).

4.23 GPA 3 provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. 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'. 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.

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 published the *London World Heritage sites SPG on Setting*²⁴ in 2012.
- 4.31 The Draft New London Plan (2017) is currently undergoing examination. The Mayor published the Draft London Plan: Minor Suggested Changes in August 2018. The current London Plan (2016) is still the adopted Development Plan, but the Draft London Plan is a material consideration in planning decisions
- 4.32 New Policy HC1 'Heritage conservation and growth', echoes the policies of the current London Plan. 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.'

Richmond Upon Thames Local Plan

- 4.33 The Richmond upon Thames Local Plan was adopted in July 2018. It replaces previous policies within the Core Strategy and Development Management Plan. The Plan sets out policies and guidance for the development of the borough over the next 15 years.
- Policy LP 1 Local Character and Design Quality:
- 4.34 Requires all development to be of high architectural and urban design quality, enhancing the character and heritage of the borough and its villages where opportunities arise.

²⁴ 2012, *The London World Heritage sites SPG on Setting*, Mayor of London, London

Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area. Compatibility with local character will include relationship to existing townscape as well as scale, height, massing, density, form, materials and detailing; as well as relationship to the public realm, heritage assets and natural features. The Council will resist the removal of shopfronts of architectural or historic interest.

Policy LP 2 Building Heights

- 4.35 The Council will require new buildings, including extensions and redevelopment of existing buildings, to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity. Proposals should preserve and enhance the borough's heritage assets, their significance and their setting; and respect the local context, and where possible enhance the character of an area, through appropriate scale, height, mass, urban pattern, development grain, materials, streetscape, roofscape and wider townscape and landscape.

Policy LP 3 Designated Heritage Asset

- 4.36 A. The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:
1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.
 2. Resist the demolition in whole, or in part, of listed building. Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II* and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset.

3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place.
 4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.
 5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on an accurate understanding of the significance of the heritage asset.
 6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.
 7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.
 8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.
 9. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.
- 4.37 B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:
1. In the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;
 2. In the case of less than substantial harm to the significance of the heritage asset, that the public

benefits, including securing the optimum viable use, outweigh that harm; or

3. The building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.

4.38 C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.

4.39 D. Where there is evidence of intentional damage or deliberate neglect to a designated heritage asset, its current condition will not be taken into account in the decision-making process.

4.40 E. Outline planning applications will not be accepted in Conservation Areas. The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.

Policy LP 4 Non-Designated Heritage Assets

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

Policy LP 5 Views and Vistas

4.42 The Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area and resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline. It will require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced; to take care not to create intrusive elements in its foreground, middle ground or background of the setting of a landmark; Seek improvements to views within into, and out of Conservation Areas.

Policy LP 6 Royal Botanic Gardens, Kew World Heritage site

4.43 The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage site, its buffer zone and its wider setting.

Policy LP 7 Archaeology

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

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 Colman 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; along with a summary of townscape and heritage effects.
- 5.3 A detailed assessment of the townscape and heritage effects of the proposed scheme in a series of townscape views is provided in section 6. Sections 5 and 6 should be read together.

The proposed scheme

Overview

- 5.4 The proposal involves a roof addition to the existing department store together with a rear extension at 2nd floor level and new plant area at roof level; a remodelled entrance on Golden Court providing access to the upper floor office accommodation; a remodelled secondary entrance at No. 4 Paved Court along the line of the existing shopfront; a replacement roof and insertion of a new rooflight to provide light to an atrium area together with a glazed staircase enclosure within the existing enclosed courtyard; new fenestration to the main store building; and Portland Stone cladding to the ground elevation with new stone fascia to replace the existing canopy.

Details of pre-application discussions

- 5.5 There have been a number of pre-application discussions where key heritage issues were identified i.e. impact on the listed buildings on Paved Court and the proposed courtyard; merits of the existing 1969 building (notwithstanding that it is identified as having a neutral impact on the Central Richmond Conservation Area); setting back of the new roof addition, massing and setting of the roof plant; the impact on views along Golden Court and Paved Court and the impact on the setting of the listed buildings on Old Palace Terrace and views from Richmond Green. The scheme has also been presented to the Design Review Panel. As a result, the proposals have been amended to address these issues as detailed below.

The effect of the proposed scheme on heritage significance

- 5.6 One of the main heritage impacts concerns the Listed Buildings on Paved Court with the revised entrance via the locally listed No. 4 and roof alterations to the courtyard. In addition, the revised fenestration and new cladding to the main department store building and the roof addition need to be assessed in relation to the setting of neighbouring listed buildings, particularly those on King Street, those on Old Palace Terrace and neighbouring locally listed buildings and the two Conservation Areas: Richmond Green and Central Richmond.

The effect on listed buildings

Paved Court

- 5.7 On Paved Court the Listed Buildings at Nos. 6, & 8 will essentially remain unaltered. The existing connection to the main department store building will be replaced with a window onto the atrium space. These units will remain combined for retail use and retain the existing stair connecting to the first floor. Externally the existing shopfronts are retained and internally no alterations, other than the new window, are proposed. There appears to have been some loss of historic fabric in the past at ground and first floor levels.
- 5.8 The proposals include a replacement roof to the single storey area (enclosed courtyard) located between the Paved Court buildings and the main store. Within this new roof a new rooflight is proposed to provide light to what would become a new atrium area. The rooflight, which is a simple low pitched element, has been reduced in its overall extent, and is set back from the rear walls of the listed Paved Court buildings. It does not therefore impact on any historic fabric and is sympathetic in terms of its detailing. Also proposed within this area is a staircase connecting to the main store building at first floor level. The stairs will be enclosed within a glazed structure. This will be a lightweight aluminium framed structure following the line of the side wall. The views to the rear of these buildings are limited and the juxtaposition of the rooflight and glazed stair enclosure to these buildings is such that their setting is only minimally affected but to no adverse effect.
- 5.9 No. 4 Paved Court is locally listed. Its original shopfront was replaced c.1969 when the adjoining site was redeveloped for the new department store. No. 4 became a link from Paved Court to that new building. It is proposed to replace the recessed shopfront (which is an unsympathetic pastiche, part display, part double entrance doors) with a traditionally

designed timber framed shopfront comprising a centrally located pair of doors with windows either side. The detailed design is sympathetic to the character of the original shop fronts on Paved Court. As such the reintroduction of a single 'shopfront' to this bay along the line of the neighbouring units, represents a positive impact on the historic character of this narrow shopping street.

- 5.10 The new Paved Court entrance via No. 4, will lead to the enclosed courtyard at the rear of the Paved Court buildings. Currently used as retail floorspace, this area will provide an amenity area for the office occupiers. As described above a new rooflight and glazed stair enclosure are proposed. The existing roof is a modern intervention. The inclusion of the rooflight and stair enclosure would be of limited impact.

King Street

- 5.11 The proposals include the upper floors of the listed building at No 20 King St (postal address for upper floors is 16 Paved Court). Similar to the proposals for the Paved Court listed buildings there is no impact on historic fabric as these floors remain unaltered but will be refurbished.
- 5.12 The main impact on the listed buildings at Nos. 6, 7 & 8 King Street arises from the new roof structure which would replace the existing staircase and lift enclosure. In its current state, this is an unsightly element, in terms of both its form and materials, that stands out quite prominently on the King Street elevation when viewed from the north west. The proposed roof extension is set back from the parapet, in contrast to the existing situation where the bulky stair core enclosure structure sits almost flush with the edge of the building. In addition, the roof extension has a reduced height compared to this existing stair enclosure. Although the roof extension continues the full extent of this elevation, at its most sensitive point opposite the King Street listed buildings, it is both lower and further recessed relative to the existing. Furthermore, the design quality is undoubtedly superior. Compared to the existing structure the overall visual impact is positive. Consequently, in relation to this frontage there would be no additional or adverse impact and the effect on these listed buildings, in comparison to the existing stair enclosure, would be positive and beneficial. The improved elevational treatment contributes to this impact.

Old Palace Terrace & The Green

- 5.13 The new roof extension will be visible from Richmond Green. In winter months this view is at its most exposed but even then there remains some tree cover. During the rest of the year this view will be well screened, although not entirely, by dense tree foliage. Within this context the roof extension would be seen in the backdrop of the listed buildings on The Green and Old Palace Terrace when viewed from the north. As existing the unsightly roof plant appears in this view.
- 5.14 The proposed roof extension, although occupying the full width of the building, would be lower in height than the existing roof plant and the area of new roof structure is angled away from Old Palace Terrace reducing its visibility. Furthermore the western area of the roof benefits from greater screening from the mature trees on the Green, even in winter, so it would appear not so prominent although it would be visible. The centrally located roof plant appears marginally above the height of the roof extension but not to any imposing extent. The combination of tree screening and angling away means that the additional volume does not have as much impact on views from the Green compared with the eastern section.
- 5.15 In terms of aesthetics the proposal, which is well designed with good quality materials, is clearly superior to the existing poor quality external finish and obviously functional plant structure. Despite the greater width of the roof extension and the marginal extent of the roof plant which would be visible, as a result of the design and materials, the proposals would improve the appearance of the roofscape as it appears in the backdrop to these listed buildings. The additional massing on the roof would be significantly mitigated by this much improved design. On that basis there would be a neutral impact on the setting of the listed buildings and as such the setting of the listed terrace would therefore be preserved and no harm would arise.

The effect on locally listed buildings

- 5.16 As mentioned in section 3 above there are numerous locally listed buildings (buildings of townscape merit) along George St and King Street. For the same reason that the Heritage impact on the listed King Street buildings is considered to be positive and beneficial the same can be concluded in relation to the locally listed buildings. The set back of the stair and lift enclosure and the improved visual appearance supports this conclusion.

- 5.17 Regarding the impact on the many locally listed buildings on George Street the main issue is related to the roof extension, although the elevational alterations will certainly improve the appearance of the building. To that extent the impact is positive. The roof extension, as a well-designed and recessed element will not be prominent in views from the north east. From the south the new roof extension will close the vista in a positive way. The detailing is simple and understated and in particular the concave corners reflect one of the more distinctive features of the existing building. Due to its siting the roof plant is barely visible in views along George Street from the north east. From the south, although visible it is set well back towards the centre of the roof so would not impose strongly in this view. Notwithstanding the visible element of the roof plant the overall impact of the roof extension, due to its form, design, materials and corner detailing, is positive and mitigates any negative impact that could potentially arise from the increased massing. Overall the impact on the locally listed buildings can be seen as neutral if not as a minor positive impact.

The effect on conservation areas

Richmond Green Conservation Area

- 5.18 Impacts on the Richmond Green Conservation Area are largely related to the roof extension when viewed from the Green and along King Street from the west as discussed above.
- 5.19 The proposed 2nd floor rear extension will also have some visibility. The most obvious impact would be experienced in the approach into Golden Court coming from The Green. From George Street the extension is not visible other than from immediately in front of the entrance. In the approach from the Green the extension would have only a relatively modest impact due to the narrowness of Golden Court and the set back of this element from the main building and is a single storey above the double height entrance. In this context the 2nd floor extension would not appear overbearing and would be in keeping with the scale of the building.
- 5.20 From within Paved Court itself the roof extension would not be visible. The narrowness of this passage does not allow for views of the department store some metres behind the Paved Court buildings.
- 5.21 Along Golden Court coming from the Green the roof extension would be visible. However with a 2 metre set back this would

not be obtrusive or over-bearing. Progressing down Golden Court the views become more oblique. The new rear elevation is well designed with simple detailing. The light weight, predominantly glazed roof storey, set back from the parapet would not be intrusive in these close views. To this extent the increased massing is appropriate to the scale of the existing building.

- 5.22 Whilst it is recognised that the main department store building has a greater scale than the surrounding buildings, the additional height on the north west corner, due to the 2 metre set back, the overall height and the design detailing, would not contribute to any appreciable sense of increased scale. The roof level extension to the rear stair and lift core, although clearly taller than The Princes Head pub on the corner, due to the distance from the rear of the building to the junction of Golden Court and Paved Court, the additional bulk would not be imposing. The impact in this part of the Conservation Area would be neutral or at worst, be of less than substantial harm.

Central Richmond Conservation Area

- 5.23 The main impacts on the setting of the Central Richmond Conservation Area is in relation to the new roof addition and how it is viewed along George Street from both the north east and the south east and the elevational changes to the main store building including the removal of the existing canopy.
- 5.24 Whilst adding mass to the top of the existing building, the new extension has the benefit of providing a unified structure that replaces a roofscape which currently has what appears as two disparate and unsightly elements. The most obtrusive of these is the stair and lift enclosure which is prominent in the view along George Street from the south. In effect, the roof addition will incorporate this unsightly element into a well-designed uniform element which caps the building in a sympathetic manner. In this way the roof extension will impact positively in this view within the Conservation Area.
- 5.25 The elevational alterations to the main department store building involve the fitting of contemporary glazing in a pattern similar to the existing but with more elegant proportions, sympathetic to the style of the building. The existing dark granite cladding to the base of the building is to be replaced with Portland stone in keeping with the upper floors. The removal of the heavy canopy will allow for a more defined building base by exposing the ground floor fascia which will be

formed of the same material. The detailing here has been well considered with the fascia detailing echoing the dark mosaic edging to the upper floor glazing and the indented pilaster both of which combine to give greater definition to the ground floor elevation. New glazed canopies are proposed over the corner entrances. The bay widths will be increased owing to the removal of alternate piers. Internally this will allow for significantly improved passage of light whilst giving the street elevations a lighter, more contemporary appearance whilst at the same time retaining the distinctive 1960s architecture.

- 5.26 The (Central Richmond) Conservation Area study published in 2001 noted that the building, together with the Post Office were “ bland and of poor design quality and an unfortunate and unsuitable focus for the vista.” The building is clearly untypical, both in scale and character, of the surrounding conservation area which comprises predominantly 18th and 19th century buildings. However it is of some design merit but within this historic context, and as noted in the CA study, it is neither a designated nor an undesignated heritage asset. The approach taken in relation to the elevational changes and the removal of the canopy is to allow for a single view of the elevation without the break and separation provided by the canopy. This will enhance both the appearance of the building where the cladding is consistent at all levels and allows for the possibility of a visible retail display at 1st floor level. The proposals can be seen to enhance the positive features of the existing building including the fenestration rhythm and stone façade. The replacement of the dark granite and the heavy canopy with lighter materials will highlight the ground floor retail use. Glazed canopies over the ground floor entrances provide a reference to the heavier existing canopy and the dark fascia treatment echoing the mosaic detailing to the upper floor glazing together with the strong pilaster treatment ‘ground’ the building in a sympathetic way and provide a coherent elevation treatment with the upper floors. Hence the elevational changes proposed will enhance the appearance of this building and highlight the retail use in a contemporary and appropriate manner.
- 5.27 The suggestion of harm arising from the loss of the canopy has been raised. The NPPF, as referenced earlier, indicates that in relation to non-designated heritage assets, although this building is not described or acknowledged as such, a balanced judgement should be employed in regards to the scale of any harm or loss to the significance of the heritage asset. Even if

that higher standard was to be applied to the issue of the removal of the canopy, the scale of harm or loss of significance would be of a very low order if it existed at all. A balanced judgement would lead to the conclusion that the loss of this element of the original design could not outweigh the benefits of the scheme. As it stands this test does not apply. The contemporary approach being taken to this building will not harm or undermine the modest contribution one might acknowledge the building makes to the conservation area. Its role within the historic townscape is not dependent on this singular element. Arguably the alterations to the building will lift it from being considered bland to animating it allowing it to positively enhance the conservation area. The removal of the canopy results in an open more legible building and in this way the vista should be improved thus resulting in an enhancement to the Conservation Area and as such it represents a positive heritage impact.

- 5.28 The proposed roof addition picks up the fenestration pattern via a lightweight structure which is recessed on all facades except for the stair and lift enclosure midway along the rear elevation. This latter element is set immediately behind the parapet. The replacement of the two bulky and unsightly elements of plant, stair and lift housing, with a single unified, albeit more extensive element, in keeping with the main body of the building, will provide a well-mannered termination to the building. This will sit well within the Central Richmond Conservation Area on this prominent site.

Conclusion

- 5.29 The scheme is a sensitive upgrading of the existing building retaining the original key design principles with a sympathetic new contemporary glazing system which successfully unifies the old with the new. The proposed extensions are sensitive in terms of form and design. Notwithstanding the additional bulk at roof level the quality of design and sensitive massing of extensions would have a modest but acceptable impact on the settings of the many listed buildings and the setting of both conservation areas.

6 Townscape, heritage and visual impact assessment

6.1 8 no. verified views have been provided (7 x CGIs and 1 x Wireline) and are included as part of the DAS submitted by Colman architects. (Appendix C - View point plan) These views have been agreed during the pre-application process in order to assess key visual impacts on Townscape, Listed Buildings and the setting of the 2 Conservation Areas which the site straddles.

6.2 View 1 – George Street from the south.

6.3 In this view the proposed roof extension is seen as a uniform structure, replacing the existing unsightly and disparate plant structures. The roof extension reflects the rhythm and character of the building's façade, including the distinctive concave corner feature. Set back on both frontages: George St and King St, and with a proportionate height (slightly lower than the existing roof plant), the proposal results in an attractive and subservient addition to the building. The setback and reduced height on the King Street elevation in the location of the stair core, compared to the existing roof plant structure, would be a significant improvement. The new roof plant, which is substantially set back from the corner in a central location appearing marginally higher, is, in this view, a neat and largely unobtrusive feature. The overall impact, notwithstanding the increased mass, due to the quality of design and sensitive massing would have a positive impact on the Conservation Area.

6.4 View 2 - King Street from the north west

6.5 This view along King Street is one which currently demonstrates the greatest level of exposure of the stair core and roof plant structure and is unduly dominant and unsightly. By contrast the proposed roof extension presents a much improved view. The top floor is set back from the building's façade thus reducing the impact on the street. The design of the roof extension represents a major improvement over what currently exists here. The form, profile, height, massing, cladding and overall design is of a high quality and significantly improves the appearance of the building in this view and would be an enhancement within the Conservation Area. In particular the reduction in height of the new stair core and it being set in from the building's edge results in reduced massing in this area

giving greater prominence to the neighbouring chimney stack. Set in the context of the many listed buildings on King Street, and framed also by Old Palace Terrace, this also represents an improvement on their setting and that of the Conservation area. The proposed roof plant is not visible in this view and therefore has no impact here. Overall the impact in this view would be positive on both the setting of the conservation area and that of the listed buildings.

6.6 View 3 – View across Old Palace Terrace

6.7 In this view the well designed roof extension, replacing the existing unsightly roof plant structures, albeit a greater mass, sits neatly above the roofs of the listed houses on Old Palace Terrace. The lightweight glazed but understated treatment in this historic context contrasts subtly with the tiled roofs of the Old Palace Terrace houses. It provides a relatively neutral backdrop to this listed terrace. The new roof plant occupies approximately 2/3rds of the width of the roof. Above the central section of the terrace it is marginally visible and towards the north east there is greater visibility although it is angling away at this point. Combined these elements do not represent a significant intrusion in the roofscape. Given the distance between the listed terrace and the application site, together with the long view where the new structure becomes visible – and drops away due to the building's alignment, the roof extension and plant will appear as a marginal addition to the traditional and historic roofscape. Together, if anything, they are likely to be less, but certainly no more obtrusive than the existing roof structures which, unlike the proposal, have no design merit.

6.8 The impact of the roof extension is partly mitigated as a result of the materials which are sympathetic and unobtrusive. Although in winter views this addition would be visible, but not particularly prominent as set out above, the roof extension will, during summer months and much of the year when trees are in foliage, be largely screened from view. As such the impact of this comparatively marginal incursion into the roofscape and at some distance, would not be harmful. Notwithstanding the greater mass and the marginally taller centrally located roof plant, the significantly improved aesthetic qualities in comparison with the existing roof plant structures means that the impact would be neutral.

- 6.9 View 4 – from Richmond Green
- 6.10 In this view the new roof accommodation is a visible extension above the exposed 2 upper floors of the existing building which forms a backdrop to the Princes Head pub on the corner of Paved Court facing The Green. On the southwest side of the building the roof extension would replace the existing bulky and unsightly plant structures. Whilst projecting further rearwards in the central section to accommodate the stair and lift core, in this area the more sympathetic roof extension would represent an improvement on the existing. The additional mass to the east, even in the winter views is viewed through relatively heavy tree cover, albeit not in foliage. Notwithstanding its greater mass nonetheless it would present a uniform and appropriate roof treatment. In summer views the roof extension will be very heavily screened by trees and will be barely perceptible.
- 6.11 The additional massing along this vista, seen in the context of a more orderly and better designed roof treatment to the existing building and given heavy tree screening, replacing the existing plant structures would result in an essentially neutral impact or at worst it would have a minor negative impact. The proposed roof plant adds marginally to the overall height but due to its siting set back centrally from the rear, although slightly visible it would not be prominent.
- 6.12 The design is a positive aspect and the detailing and materials are sympathetic to the context of the Conservation Area. The overall improvement in the appearance of the building and the coherent design approach to this roof extension, notwithstanding the increased massing, results in a neutral or potentially minor negative impact on both the setting of the Conservation Area and the nearby listed buildings and any harm that would result would be less than substantial.
- 6.13 View 5 – View from The Green looking south west
- 6.14 In this view, which is a lateral view, the northwest corner of the roof extension, a comparatively small section, would be visible above the roof of the Princes Head on the corner of Golden Court and Paved Court. Set back beyond the rear of the pub and, in this view, appearing significantly lower than the other corner building at 26 The Green (corner of Golden Court), the roof extension would be a marginal projection within this vista. The dominant element in this view would remain No 26 which together with the pub would still frame the view into Paved

Court. This passageway, which is lined with listed buildings, mainly 2 storey buildings with ground floor retail, will therefore not be impacted and its scale and character would be largely unaffected. The pub's prominence in this view would not be reduced. The setting of the Conservation area and that of the listed Paved Court buildings and those fronting The Green would not be harmed. The impact would be limited.

6.15 View 6 – View from north east end of George Street (Wireline)

6.16 In this view, which is a relatively long view along George Street from the direction of the train station, the roof extension appears very marginally above the neighbouring buildings but critically behind the building line. The pedimented roof at No 70/72 George Street retains its prominence in this view and the small additional mass would sit behind this. Further behind a fragment of the new roof would be visible. Due to the distance involved, the extent to which the roof additions are evident in the view would be negligible and the roofline along this side of the street would therefore effectively remain uninterrupted and intact as a result of the development. There is no significant visual impact nor any harm arising within this view. The impact on the setting of the Conservation area and heritage assets would be neutral.

6.17 View 7 – View from The Green – long view

This view is set further distant into the Green between views 3 & 4 above. Although the new roof extension is clearly visible between the trees, at some distance, this compares favourably to the existing situation where the roof plant is also visible. The main change in terms of impact is therefore related to the design and materials of the structure that appears in this view. The simple form and quality of materials, and the overall appearance of the structure represents an improvement over the existing bulky somewhat crude plant structure that currently exists. Whilst in winter the greater extent of the new roof addition compared to the existing will be more obvious it will nevertheless benefit from some screening. Hence its overall neater form, design and materials will result in a neutral if not minor beneficial impact.

6.18 View 8 – View from King Street - close view

In this close view the new roof extension provides a much improved appearance compared to the existing situation. The massing of the new roof extension in this point is comparable to the existing being marginally lower but slightly deeper, in terms of what is visible from this viewpoint. The design details, the form and materials represent a significant improvement over what currently exists. The impact would be positive on the setting of the listed buildings opposite and this part of the Conservation Area.

Conclusion

- 6.19 The verified views analysed in this section demonstrate that the impact of the proposed roof extension on Heritage Assets would not be harmful. The siting, form, design and materials combine to provide an appropriate addition to the building. As it appears in the many views assessed the impact of any additional massing is significantly mitigated by well-considered design detailing and careful siting. Overall a positive impact arises due to the quality of design and notwithstanding the additional massing the appearance of the building would be much improved. The setting of both Conservation Areas and the many listed buildings would be preserved.

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.

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

- 7.3 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.

- 7.4 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.

The National Planning Policy Framework

- 7.5 This report has provided a detailed description and analysis of the significance of the site and its heritage context, as required by Paragraph 189 of the National Planning Policy Framework.

- 7.6 The proposal satisfies Paragraph 192, sustaining and enhancing the heritage significance of the of the department store and its listed elements, 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.
- 7.7 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.
- 7.8 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

- 7.9 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. The scheme clearly ‘conserves the significance of heritage assets’. For these reasons, the scheme is consistent with Policy 7.8 of the London Plan.
- 7.10 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’.
- 7.11 It satisfies new Policy HC1 in that the proposals should seek to avoid harm and identify enhancement opportunities by

integrating heritage considerations early on in the design process.

Historic England guidance on the setting of heritage assets

7.12 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.

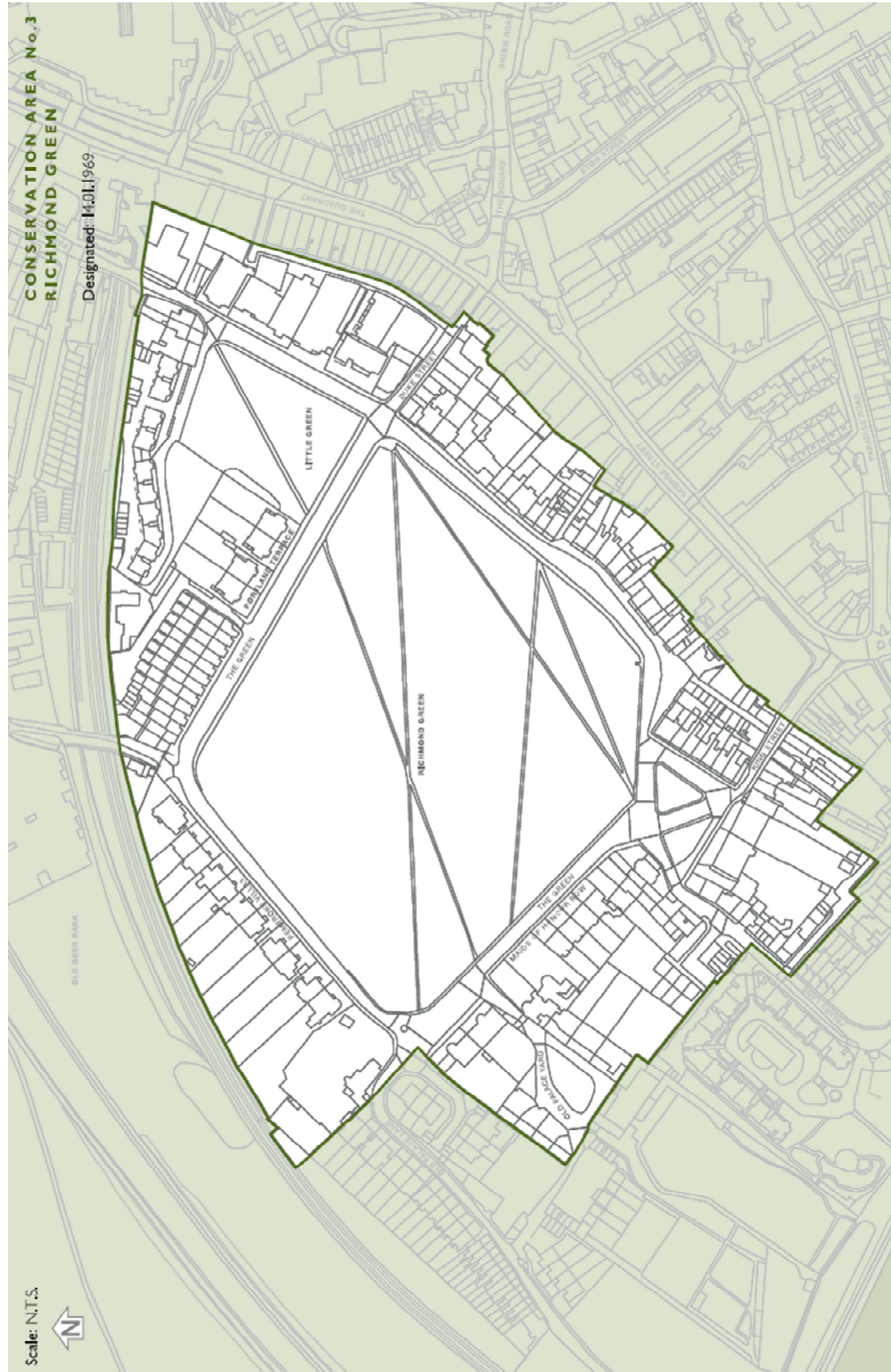
Richmond Upon Thames Local Plan

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

8 Summary and conclusions

- 8.1 The application site is located across 2 Conservation Areas : Central Richmond and Richmond Green Conservation Areas within the Borough of Richmond upon Thames. The main department store building was constructed in 1969.
- 8.2 The site includes three listed buildings under the Planning (Listed Buildings and Conservation Areas) Act 1990 at Nos 6 & 8 Paved Court and 20 King Street.
- 8.3 The purpose of the proposed works is the demolition of the existing plant storey and replacement with an enlarged extension at roof level; 2nd floor rear extension; centrally located roof plant enclosure together with other elevational alterations.
- 8.4 The proposed works fully respect the character and appearance of the Conservation area. The works will assist in sustaining the viable use of the building as a commercial property.
- 8.5 The setting of nearby listed buildings and the character and appearance of the above-mentioned Conservation Areas will be preserved by the proposed works.
- 8.6 For these reasons, the proposed scheme will comply with the law, and national and local policies and guidance for urban design and the historic built environment.

Appendix A: Richmond Green Conservation Area



Appendix B: Central Richmond Conservation Area



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Appendix C: Viewpoints

