

54 George Street Richmond

HERITAGE & TOWNSCAPE BASELINE ASSESSMENT | APRIL 2021

On behalf of Lombard Asset



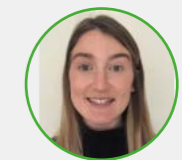
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Nairita Chakraborty
Associate
nchakraborty@iceniprojects.com
020 3725 3841



Georgina Mark
Consultant
gmark@iceniprojects.com
020 3657 5031

Section 1

Introduction.

1 | Introduction

- 1.1 This Heritage Statement is supplied to provide an assessment of the significance of 54 George Street (henceforth 'the Site'), and its surrounding heritage assets, and the impact a proposed development upon these.
- 1.2 No. 54 George Street is not a designated heritage asset on its own, however it has been identified as a Building of Townscape Merit by the London Borough of Richmond (LBoR) and falls partly within Richmond Green Conservation Area and partly in Central Richmond Conservation Area.
- 1.3 This report will:
- Set out the relevant legislative and policy framework within which to understand the proposed redevelopment of the Site;
 - Provide a proportionate and robust analysis of the Site and surrounding area's historic development;
 - Describe the site and identify relevant designated heritage assets;
 - Appraise the heritage significance of the Site and identify its contribution to the Richmond Green Conservation Area and the Central Richmond Conservation Area; and,
 - Provide a detailed assessment of impact for the proposals on the Site and its setting, and on the character and appearance of the Richmond Green Conservation Area and the Central Richmond Conservation Area.
- 1.4 The existing Site and surrounding area was appraised during a site visit (March 2021), and a desk-based study was also undertaken which included review of the Richmond Green Conservation Area Statement and the Central Richmond Conservation Area Statement and an Ordnance Survey map regression.
- 1.5 The report is produced by Icen Projects. Specifically, it is authored by Georgina Mark BA (Hons.) MSt (Cantab), Heritage Consultant, with guidance and review by Nairita Chakraborty MRTPI IHBC, Associate- Heritage.



Figure 1.1 Aerial view of Site, boundary marked in red
Source: Edited from Google

Section 2

**Planning Legislation, Policy &
Guidance.**

Legislation

- 2.1 Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.
- 2.2 Primary legislation under Section 66 (1) of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or Secretary of State, as relevant, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.
- 2.3 Section 72(1) of the Act, meanwhile, states that:
- ‘In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.’

National Policy

National Planning Policy Framework (February 2019) (As amended)

- 2.4 In July 2018, the government published the updated National Planning Policy Framework (“NPPF”), which was updated in February and June 2019. This national policy framework encourages intelligent, imaginative and sustainable approaches to managing change. Historic England has defined this approach, which is reflected in the NPPF, as ‘constructive conservation’: defined as ‘a positive and collaborative approach to conservation that focuses on actively managing change...the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment’ (Constructive Conservation in Practice, Historic England, 2009).
- 2.5 Section 12, ‘Achieving well-designed places’, reinforces the importance of good design in achieving sustainable development, by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms, in paragraph 127, the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond 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).
- 2.6 The guidance contained within Section 16, ‘Conserving and enhancing the historic environment’, relates to the historic environment, and developments which may have an effect upon it.
- 2.7 Heritage Assets are defined in Annex 2 of the NPPF as: ‘A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).’ Listed buildings and Conservation Areas are both designated heritage assets.

- 2.8 ‘Significance’ is defined as ‘The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.’
- 2.9 The ‘Setting of a heritage asset’ is defined as ‘The surroundings in which a heritage asset is experienced. 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.’
- 2.10 Paragraph 187 requires local authorities to maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to assess the significance of heritage assets and the contribution they make to their environment.
- 2.11 Paragraph 189 states that, when determining applications, local planning authorities should require applicants to describe the significance of the heritage assets affected and any contribution made by their setting. The level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance. According to Paragraph 190, local planning authorities are also obliged to identify and assess the significance of any heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.
- 2.12 Paragraph 192 emphasises that local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

- 2.13 Paragraph 193 states 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. It emphasises that the weight given to an asset’s conservation should be proportionate to its significance, and notes that this great weight should be given irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 2.14 Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 2.15 Paragraphs 195 and 196 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), considerable weight should be applied to the statutory duty where it arises. Proposals that would result in substantial harm or total loss of significance should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss (as per Paragraph 195). Whereas, Paragraph 196 emphasises that where less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including securing its optimum viable use.
- 2.16 Paragraph 197 requires a balanced judgment for proposals that affect non-designated heritage assets, having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.17 Paragraph 200 encourages opportunities for new development within, and within the setting of, Conservation Areas and World Heritage Sites. Paragraph 201 notes that not all elements of Conservation Areas and World Heritage Sites will contribute to their significance, but that, if harm to their significance is caused, decisions should follow the balancing exercise set out in paragraph 195 or 196, as appropriate.

National Design Guide (September 2019)

2.18 In September 2019, the Ministry of Housing, Communities and Local Government (MHCLG) produced a National Design Guide illustrating how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance, alongside the separate planning practice guidance on design process and tools.

2.19 The Guide recognises that well-designed places have individual characteristics which work together to create its physical Character. It introduces 10 specific characteristics that would need to be considered when considering new development. These are:

- **Context** - An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments.
- **Identity** - The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is not just about the buildings or how a place looks, but how it engages with all of the senses.
- **Built form** - Built form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics.
- **Movement** - Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. They contribute to making high quality places for people to enjoy. They also form a crucial component of urban character.
- **Nature** - Nature contributes to the quality of a place, and to people's quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.
- **Public spaces** - The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements.

- **Uses** - Sustainable places include a mix of uses that support everyday activities, including to live, work and play. They need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities.
- **Homes and buildings** - Well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them. They meet the needs of a diverse range of users, taking into account factors such as the ageing population and cultural differences.
- **Resources** - Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change. It identifies measures to achieve: mitigation, primarily by reducing greenhouse gas emissions and minimising embodied energy; and; adaptation to anticipated events, such as rising temperatures and the increasing risk of flooding.
- **Lifespan** - Well-designed places sustain their beauty over the long term. They add to the quality of life of their users and as a result, people are more likely to care for them over their lifespan. They have an emphasis on quality and simplicity.

2.20 MHCLG further intend to publish a National Model Design Code, setting out detailed standards for key elements of successful design. This will intend to consider the findings of the Building Better, Building Beautiful Commission and recommendations to the Government on how to promote and increase the use of high-quality design for new build homes and neighbourhoods.

2.21 The Guide acknowledges that quality design does not look the same across different areas of the country, for instance, that by definition local vernacular differs. MHCLG, therefore, expects that local planning authorities develop their own design codes or guides, taking in to consideration the National Model Design Code. These would be expected to set clear parameters for what good quality design looks like in their area, following appropriate local consultation.

2.22 In support of Paragraph 130 of the National Planning Policy Framework, which states requires local authorities to refuse "permission for development of poor design that fails to take the opportunities available for improving the character and quality of an area and

the way it functions, taking into account any local design standards or style guides."; MHCLG expects that in the absence of local design guidance, local planning authorities will defer to the illustrated National Design Guide and National Model Design Code.

Planning Practice Guidance ("PPG") (Department for Communities and Local Government, March 2014)

2.23 The guidance in the PPG supports the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Paragraph 002 states that conservation is an active process of maintenance and managing change that requires a flexible and thoughtful approach, and that neglect and decay of heritage assets is best addressed through ensuring that they remain in active use that is consistent with their conservation.

2.24 Paragraph 006 sets out how heritage significance can be understood in the planning context as archaeological, architectural, artistic or historic, defined as follows:

- **archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- **historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

2.25 The PPG emphasises in paragraph 007 the importance of assessing the nature, extent and importance of a heritage asset in understanding the potential impact and acceptability of development proposals.

2.26 Paragraph 018 explains that, where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply. It goes on to state that whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest.

2.27 Harm may arise from works to the heritage asset or from development within its setting. Setting is stated to include the surroundings in which a heritage asset is experienced, and may be more extensive than its curtilage. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

2.28 The PPG also provides clear guidance in paragraph 020 on the meaning of 'public benefits', particularly in relation to historic environment policy, including paragraphs 193 to 196 of the NPPF. The PPG makes clear that public benefits should be measured according to the delivery of the three key drivers of sustainable development: economic, social and environmental outcomes, all of which are reflected in the objectives of the planning system, as per Paragraph 8 of the NPPF. Public benefits include heritage benefits, and do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Historic Environment Good Practice Advice in Planning

2.29 To support the national policies, three separate Good Practice Advice in Planning Notes (GPA's) have been published by Historic England.

GPA 1: The Historic Environment in Local Plans [March 2015]

2.30 This advice note focuses on the importance of identifying heritage policies within Local Plans. The advice stresses the importance of formulating Local Plans that are based on up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, including the historic environment, as set out by the NPPF.

2.31 The document provides advice on how information about the local historic environment can be gathered, emphasising the importance of not only setting out known sites, but in understanding their value (i.e. significance). This evidence should be used to define a positive strategy for the historic environment and the formulation of a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset (s) and make a positive contribution to local character and distinctiveness.

2.32 The document gives advice on how the heritage policies within Local Plans should identify areas that are inappropriate for development as well as defining specific Development Management Policies for the historic environment.

GPA 2: Managing Significance in Decision-Taking in the Historic Environment [March 2015]

2.33 This document provides advice on numerous ways in which decision-taking in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured staged approach to the assembly and analysis of relevant information and is as follows:

- Understand the significance of the affected assets;
 - Understand the impact of the proposal on that significance;
 - Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
 - Look for opportunities to better reveal or enhance significance;
 - Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
 - Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.
- 2.34 The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process in informed decision-taking.
- 2.35 The document sets out the recommended steps for assessing significance and the impact of development proposals upon it, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Crucially, the nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be necessary.

GPA 3: The Setting of Heritage Assets (2nd Edition) [December 2017]

2.36 This advice note focuses on the management of change within the setting of heritage assets. It replaces The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 - 1st edition, (2015) and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011).

2.37 The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time those taking decisions need enough information to understand the issues.

2.38 This note gives assistance concerning the assessment of the setting of heritage assets and the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings; and that settings can contribute to the significance of a heritage asset.

2.39 This note gives general advice on understanding setting and how it may contribute to the significance of heritage assets. It also provides a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets. It suggests that, at the pre-application or scoping stage, the local authority, having due regard to the need for proportionality:

- indicates whether it considers a proposed development has the potential to affect the setting of (a) particular heritage asset(s), or
- specifies an 'area of search' around the proposed development within which it is reasonable to consider setting effects, or
- advises the applicant to consider approaches such as a 'Zone of Visual Influence' or 'Zone of Theoretical Visibility' in relation to the proposed development in order to better identify heritage assets and settings that may be affected.

2.40 Particularly for developments that are not likely to be prominent or intrusive, the assessment of effects on setting may often be limited to the immediate surroundings, while taking account of the possibility that setting may change as a result of the removal of impermanent landscape or townscape features, such as hoardings or planting.

2.41 This should be followed by an analysis to assess whether the setting of an affected heritage asset makes

a contribution to its significance and the extent and/or nature of that contribution; both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated.

2.42 The next stage is to identify the effects a development may have on setting(s) and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s).

2.43 At the proposal stage, ways to maximise enhancement and avoid or minimise harm should be considered. Enhancement (see NPPF, paragraph 137) may be achieved by actions including:

- removing or re-modelling an intrusive building or feature
- replacement of a detrimental feature by a new and more harmonious one
- restoring or revealing a lost historic feature or view
- introducing a wholly new feature that adds to the public appreciation of the asset
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset, or
- improving public access to, or interpretation of, the asset including its setting.

Regional Policy

The London Plan

- 2.44 Regional policy for the London area is defined by the London Plan. The New London Plan has now been adopted (March 2021) and deals with heritage issues in Chapter 7 Heritage and Culture, covering policies HC1 – HC7, London’s Living Spaces and Places – Historic environment and landscapes.
- 2.45 London Plan Policy 7.4 requires development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings. The design of buildings, streets and open spaces should provide a high-quality design response enhancing the character and function of an area.
- 2.46 London Plan Policy 7.6 notes that the architecture should “make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context”.
- 2.47 London Plan Policy 7.7 Location and design of tall and large buildings, states that tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations; and that tall and large buildings should not have an unacceptably harmful impact on their surroundings.
- 2.48 In planning decisions, applications should include urban design justification, to demonstrate that the below criteria are met:
- generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport
 - only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building
 - relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
 - individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London

- incorporate the highest standards of architecture and materials, including sustainable design and construction practices
 - have ground floor activities that provide a positive relationship to the surrounding streets
 - contribute to improving the permeability of the site and wider area, where possible
 - incorporate publicly accessible areas on the upper floors, where appropriate
 - make a significant contribution to local regeneration.
- 2.49 London Plan Policy 7.8 states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- Policy 7.8 ‘Heritage assets and archaeology’ establishes the following clauses regarding heritage assets in London:*
- Strategic: 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.*
 - Planning Decisions: Development should identify value, conserve, restore, re-use and incorporate heritage assets, where appropriate.*

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

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

London Borough of Richmond Planning Policy

Local Plan 2018

POLICY P1: LOCAL CHARACTER AND DESIGN QUALITY

- 2.50 A. The Council will require all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. 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.
- 2.51 To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:
- compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
 - sustainable design and construction, including adaptability, subject to aesthetic considerations;
 - layout, siting and access, including making best use of land;
 - space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
 - inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
 - suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.
- 2.52 All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within a neighbourhood plan where applicable, and the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design.

Shopfronts

- 2.53 B. The Council will resist the removal of shopfronts of architectural or historic interest. Shopfronts, including signage and illumination, should complement the proportions, character, materials and detailing, surrounding streetscene and the building of which it forms part. Blinds, canopies or shutters, where acceptable in principle, must be appropriate to the character of the shopfront and the context within which it is located. External security grilles and large illuminated fascias will only be allowed in exceptional circumstances. In sensitive areas, such as Conservation Areas and relevant Character Areas as identified in the Village Planning Guidance SPDs, rigid and gloss finish blinds will generally be unacceptable.

Advertisements and hoardings

- 2.54 C. The Council will exercise strict control over the design and siting of advertisements and hoardings to ensure the character of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety).

POLICY LP2: BUILDING HEIGHTS

- 2.55 The Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough’s valued townscapes and landscapes, through appropriate building heights, by the following means:
- require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;
 - preserve and enhance the borough’s heritage assets, their significance and their setting;
 - respect the local context, and where possible enhance the character of an area, through appropriate:

- a. scale
 - b. height
 - c. mass
 - d. urban pattern
 - e. development grain
 - f. materials
 - g. streetscape
 - h. Roofscape and
 - i. wider townscape and landscape;
4. take account of climatic effects, including overshadowing, diversion of wind speeds, heat island and glare;
 5. refrain from using height to express and create local landmarks; and
 6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.

POLICY LP3: DESIGNATED HERITAGE ASSETS

- 2.56 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.

- 2.57 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.

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

2.59 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.

2.60 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 LP4: NON-DESIGNATED HERITAGE ASSETS

2.61 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.

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

Section 3

Historic Development of the Site and Surroundings.

3 | Historic Development of the Site and Surroundings

Historic Development of Richmond

- 3.1 The origins of Richmond lie in the thirteenth century, when King Edward I established a royal court in the area. Prior to this, Richmond had existed as a small hamlet which formed part of the manor of Shene. In 1497, King Henry VII erected a permanent residence at Richmond and soon thereafter, the surrounding area was populated by large estates owned by Tudor Courtiers such as Edward Seymour, Duke of Somerset, Thomas Cromwell, Earl of Essex and Mary Tudor.
- 3.2 The grounds of the Palace of Richmond were bounded to the north by the River Thames which provided a convenient route into the city of London and to the south by Kew Lane, which presently exists as Kew Road. By the mid-seventeenth century, the Palace of Richmond was no longer used as a royal residence, however an area of common land located south of the palace was enclosed in 1637 to provide a royal hunting ground. The town of Richmond developed between these sites, around Richmond Green which had previously formed part of the palace grounds.
- 3.3 Richmond town comprised a small cluster of large houses set within pleasure grounds and parks until the late eighteenth century. The opening of Richmond Bridge in 1777 connected the town to the industrial area of Twickenham and building development took place in the area to accommodate a resultant increase in the local population. The established route along Kew Lane was expanded into a central thoroughfare around which such development was arranged.
- 3.4 In 1846, the opening of Richmond Railway Station to the east of Richmond Green incited the rapid expansion of the town southward and residential estates comprising terraced houses were created. Building development continued into the early twentieth century and Paradise Road became a secondary thoroughfare through the area. At this time, public activity was focused along George Street and Hill Street, where commercial buildings, assembly rooms, picture theatres and the town hall were located.
- 3.5 The townscape of Richmond remained largely unchanged throughout the twentieth century and maintained its status as a suburban area. Parts of the town were rebuilt following bomb damage inflicted during the Second World War and residential developments were created to the east of the town, such as Lichfield Court (1935).

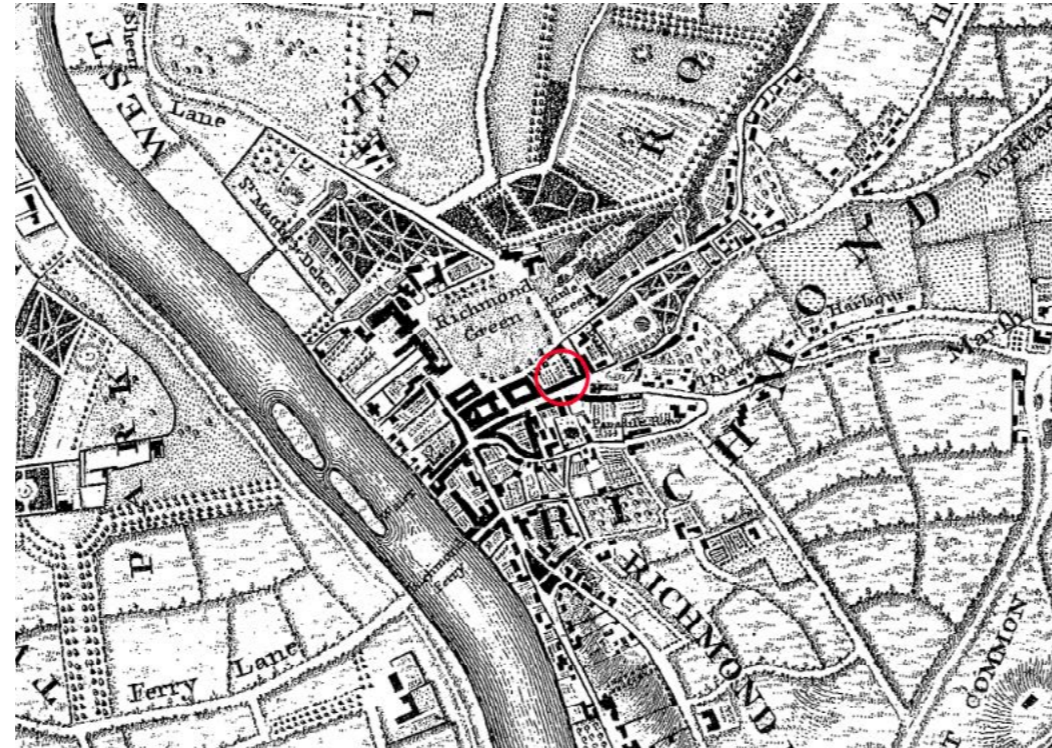


Figure 3.1 1741-5 Map by John Rocque.. The Site is marked in red.



Figure 3.3 1896 OS Map.

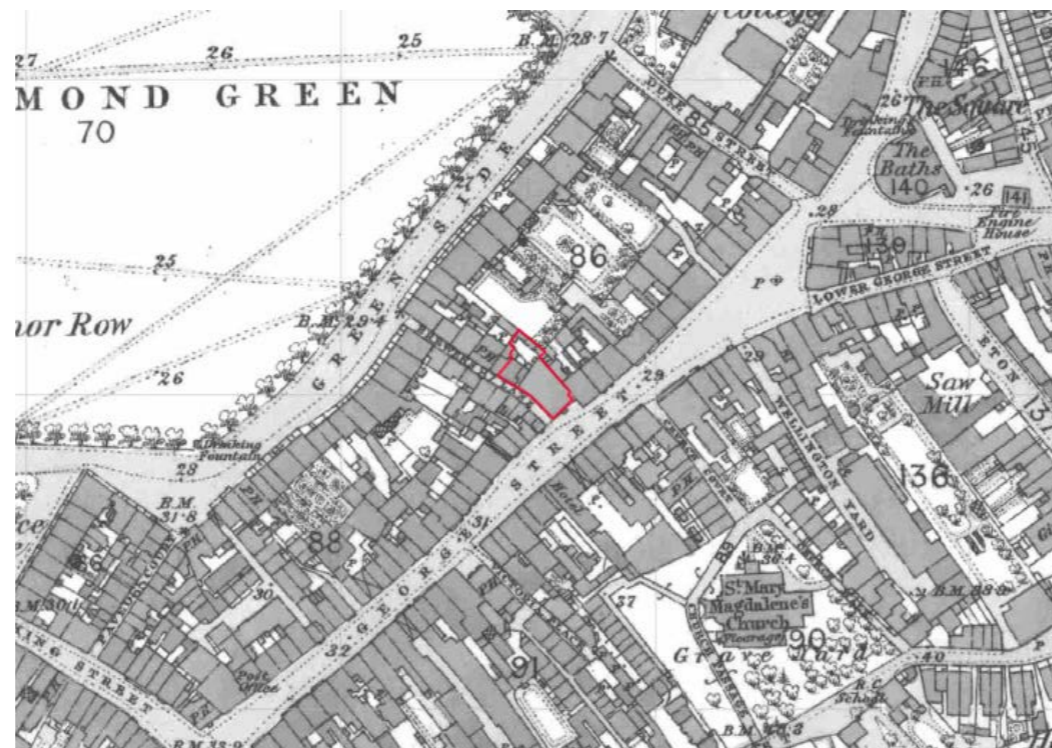


Figure 3.2 1861 OS Map.

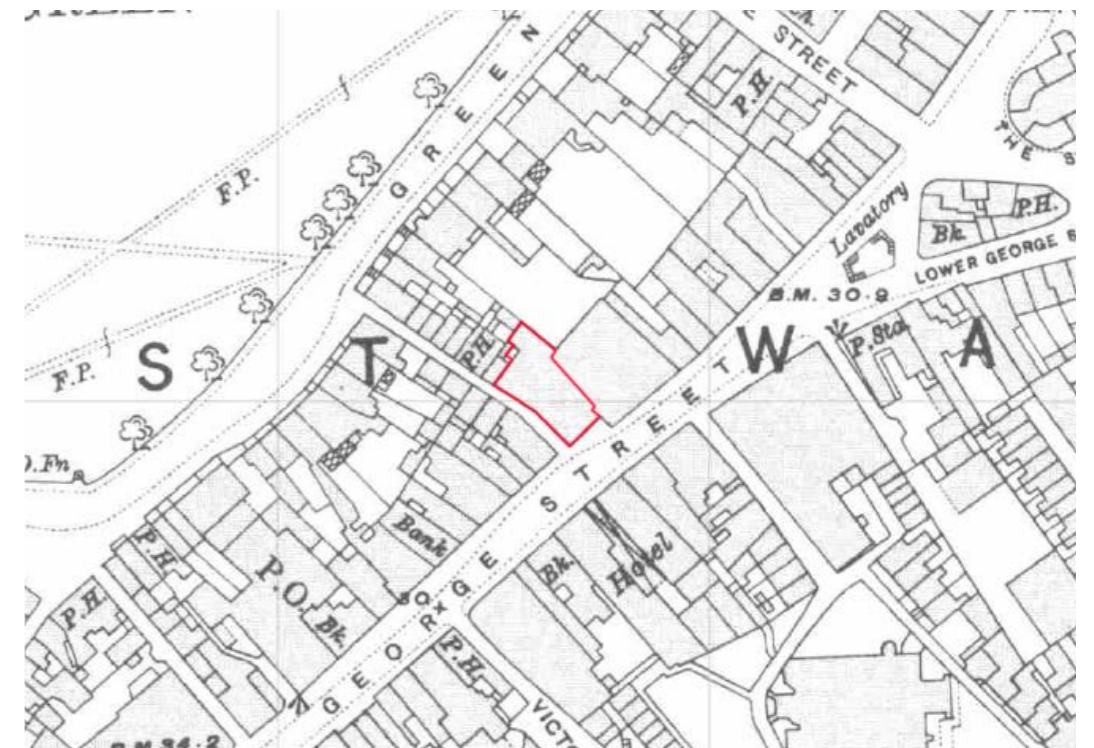


Figure 3.4 1915 OS Map.

3 | Historic Development of the Site and Surroundings

Historic Development of the Site

- 3.6 The Site is located at the junction of George Street and Brewers Lane and is abutted by buildings to the north and east. The earliest cartographic reference to identify a building on the Site is dated 1741-5 and shows the Site as part of a densely populated building line along George Street. As shown elsewhere in the town, curated gardens occupy the rear of these buildings and the Site is likely served both a residential and commercial function. A newspaper record dated 1836 confirms that a shoe shop was located at the Site.
- 3.7 An Ordnance Survey Map dated 1861 shows the Site as possessing a rectangular footprint with a courtyard to the rear, formed by a collection of buildings situated along a pedestrian footpath. By 1869, this footpath had been expanded to form Brewers Lane. Between 1869 and 1896, the Site was extended northward by the erection of an L-shape addition which resulted in the partial demolition of the neighbouring building to the north. The north range of this addition comprised two storeys whilst the southern range of the addition - effectively the central range within the building whole - comprised three storeys. At this time, the Site was also amalgamated with neighbouring building to the east.
- 3.8 A photograph of the Site dated 1928 reveals the regular composition of the original building, with its square footprint, and the asymmetrical form of the addition to the north. The building's original window openings along the west elevation and its triple-pitched hip roof are also captured in this photograph. Sometime after 1928, a third storey was added to the north end of the Site.
- 3.9 An Ordnance Survey Map dated 1960 shows how the south end of the Site was divided into two premises; nos. 54 and 53 George Street. The latter premises was incorporated within the footprint of the original building, however by 1973, it had been moved eastward, into the modern building presently abutting the Site. No further changes have been made to the footprint.
- 3.10 Sometime during the mid-twentieth century, the roof of the building was replaced by a flat roof and many openings in the west elevation were blocked. Further alterations have been made to the Site, such as the installation of a shop front at ground floor level in 1979. In 1994, permission was granted by the LBoR to change the use of the Site from a shop to a financial and professional service. There have been no major changes to the Site since this development.

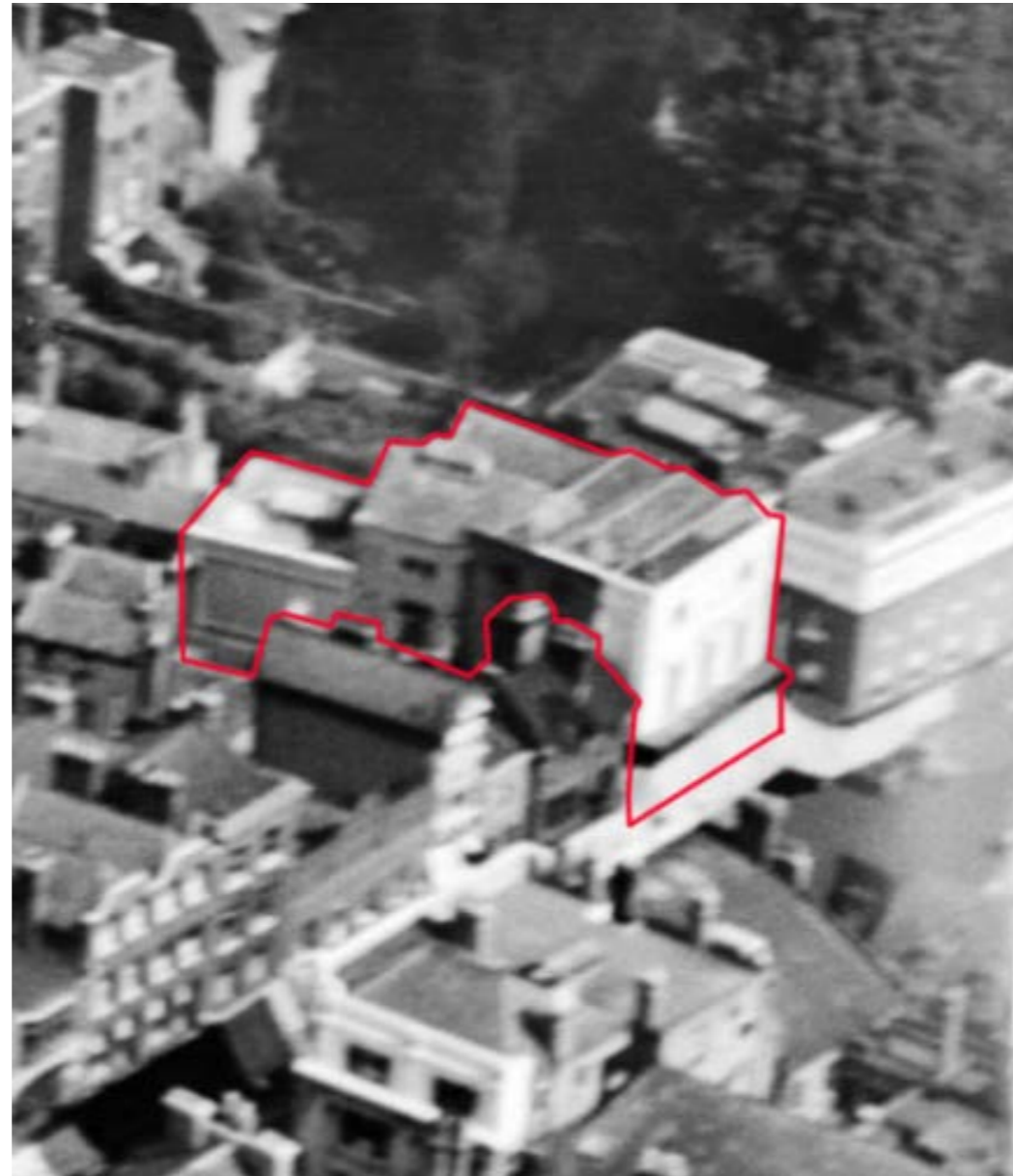


Figure 3.5 1928 Photograph of the Site.

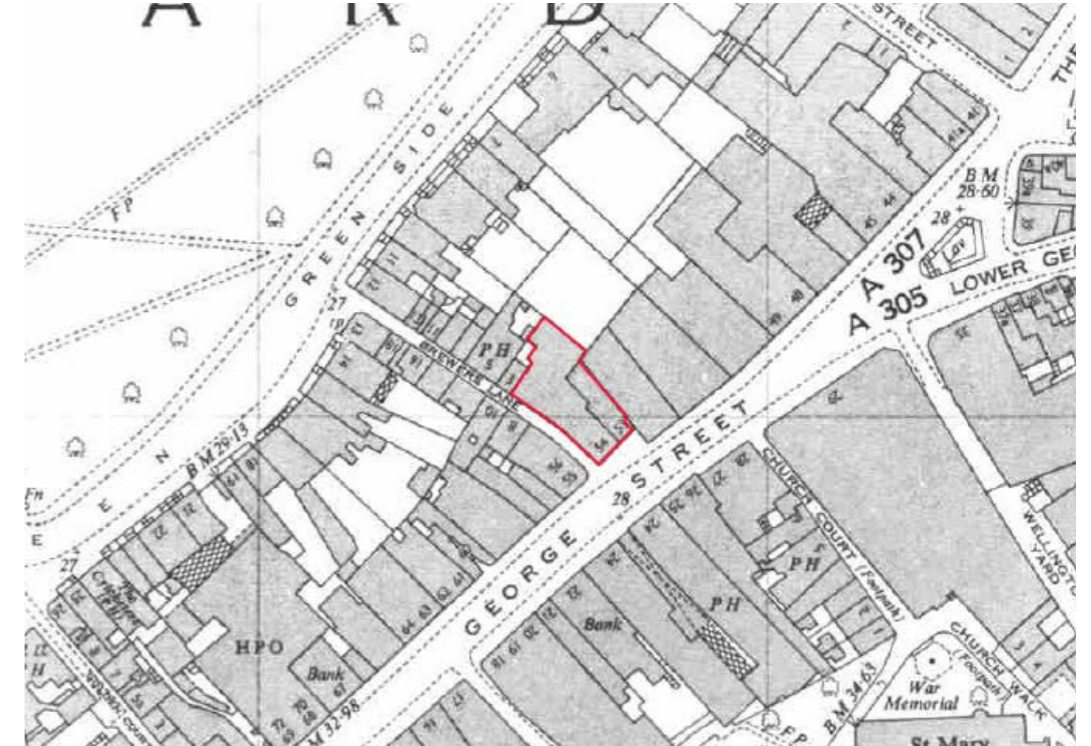


Figure 3.6 1960 OS Map.



Figure 3.7 2003 OS Map

Section 4

Site Description and Identification of Assets.

4 | Site Description and Identification of Assets

Site Description

Exterior

- 3.11 The Site is predominantly rectangular-shaped in footprint and is located to the south of Richmond Green, at the junction of George Street and Brewers Lane. No. 54 George Street comprises an amalgamation of three buildings which includes an early nineteenth-century building facing George Street and two late nineteenth-century buildings adjoining this original structure, located to the north.
- 3.12 The building possesses an irregular roofline which corresponds to the phased construction of the Site. Each building phase is covered with a flat roof which are not visible from street level and have been repeatedly altered by the insertion of modern lightwells.
- 3.13 The principal north-west elevation of the building presents a typical Regency frontage at first and second floor levels and a modern shop front at ground floor level. The symmetrical composition of the elevation is defined by two rows of three windows with moulded mullions and transoms and thin glazing bars. The windows positioned at first floor level are taller than those located a level above and are decorated with projecting hood moulds whilst the others are decorated with bracketed sills and keystones. The remaining elevation is rendered and treated with stone quoins at the edges.
- 3.14 The south-west elevation of the building faces Brewers Lane, extending north from George Street. A modern shop front at ground floor level extends the length of the original early nineteenth-century building and evidence of a blocked window is located at the first floor level of this first building phase. A small, rectangular-shaped window is positioned at second floor level.
- 3.15 The south-west elevation of the late-nineteenth century addition to the original building comprises plain architectural detailing. A single door with an arched brick head is positioned at the north end of this central building and evidence of a blocked window is positioned at first floor level.
- 3.16 The late-nineteenth century building located at the north end of the Site expresses extensive evidence of its historic alteration. A projecting stone arch indicates the former location of an external entrance and modern doors have been unsympathetically inserted into an original rusticated stone architrave. Plain brick string courses define the first and second floor levels of the building, however these have been partially removed by the insertion of windows sometime after 1928. A third storey was added to this part of the building as part of this development. This level is partially set back from the original building line and disrupts the architectural rhythm of the wider elevation.



Figure 4.1 Aerial photograph of the Site. The Site boundary is marked in red. The early-nineteenth century (original) building facing George Street is coloured blue. The central building, constructed in the late-nineteenth century is coloured green. The north building, constructed in the late-nineteenth century is coloured purple.

4 | Site Description and Identification of Assets



Figure 4.2 South-east elevation.



Figure 4.4 Rusticated stone door architrave at ground floor level on the south-west elevation.



Figure 4.3 Stone arch at ground floor level on the south-west elevation.



Figure 4.5 South-west elevation.

4 | Site Description and Identification of Assets

Interior

- 4.1 The interior of the building also expresses many phases of its historic development, as evidenced by changes in floor level and the repositioning of staircases. There is limited fabric of architectural interest at basement level; a panelled door survives in its original position, however it has been altered to provide ventilation. A staircase located within the central building is possibly original to its building phase; it has bullnosed treads and is decorated with timber panelling.
- 4.2 A dogleg staircase, likely installed at the north end of the building during the interwar period, is plain in design and rises the entire height of the building. A cast-iron casement window with moulded timber mullion and transom is positioned mid-level on this staircase and is fitted with a tiled sill.
- 4.3 An inspection of the two blocked windows at first floor level on the south-west elevation of the building reveals the crude methods used during the blinding process to enable the construction of partition walls. The original division wall between the north and central buildings is marked by a projection located to the right of the north window. A modern ceiling with decorative framing and moulded coricing has been installed at this level.



Figure 4.6 Basement door.



Figure 4.7 . Staircase with bull-nosed treads.



Figure 4.8 Casement window in the stairwell of the north building, inserted sometime after 1928.



Figure 4.9 Modern ceiling treatment at first floor level.



Figure 4.11 Blocked window on the south-west elevation of the original building..



Figure 4.10 Bottom half of an original window on the south-east elevation at first floor level.



Figure 4.12 Blocked window on the south-west elevation of the central building..

4 | Site Description and Identification of Assets

- 4.4 Further evidence of the building's complex phases of development exists at second floor level. A change in floor level and the partial remains of a rear wall indicate the original plan of the early-nineteenth century building. There is limited fabric of architectural interest in this part of the building, except for three early 20th C casement windows positioned on the south-east wall and a plain chimney breast positioned on the north-east wall.
- 4.5 Evidence of a staircase is expressed by chasing along the east and north walls of the central building, however this feature has been removed and replaced by a floor. A moulded mullion and transom window with six stained glass lights is positioned at the north wall of this space and is likely original to the construction of the central building in the late-nineteenth century. A stained glass ceiling light is also located in this space, however it comprises modern fabric.
- 4.6 To the right of the staircase, a modern lift shaft has been constructed from brick. The additional level to the north building, constructed sometime after 1928, has been crudely amalgamated with the existing second floor space, as evidenced by irregular window, ceiling and floor levels. A plain timber staircase has also been installed at the south end of this space.



Figure 4.13 Evidence of a historic staircase at second floor level.



Figure 4.15 The second floor level of the central and original buildings.



Figure 4.14 Stained glass window.



Figure 4.16 The second floor level of the north building, facing north-east.

4 | Site Description and Identification of Assets

Identification of Assets

4.7 The Site is situated within the both the Richmond Green Conservation Area and the Central Richmond Conservation Area and it has been identified by the LBoR as a Building of Townscape Merit within these areas. There are numerous designated heritage assets within the setting of the Site and the following assets are included in this report:

- Richmond Green Conservation Area - the north end of the Site is included in this Conservation Area;
- Central Richmond Conservation Area - the south end of the Site is included in this Conservation Area;
- 2, 4 and 6 Brewers Lane (Grade II), located to the south-west of the Site;
- 8 Brewers Lane (Grade II), located to the west of the Site;
- 3 Brewers Lane (Grade II), located to the north-west of the Site;
- Britannia Public House (Grade II), located to the north-west of the Site;
- 12 and 14 Brewers Lane (Grade II), located to the north-west of the Site.



Figure 4.17 Heritage Asset Map

Richmond Green Conservation Area

4.8 The north-west end of the Site is located within the Richmond Green Conservation Area. This Conservation Area was designated in January 1969, and was extended in 2005. A Conservation Area Statement produced by the LBoR describes the character and appearance of the Conservation Area surrounding The Green as follows:

The scale of the development surrounding The Green is predominantly two and three storey. Properties have tiled roofs, some with small dormer windows behind parapets or eaves cornices. Varying numbers of bays, bay widths and changes in roof and window levels accentuate the individuality of each building within the whole pattern.

4.9 Within this surround of The Green, the Site is included in the south-west part of the Conservation Area which is described as follows:

The south east side consists mainly of good examples of late 17 and early 18th century terraces of brown and red brick townhouses complete with front basement areas, railings and entrance steps directly abutting the pavement. The southwest frontage is less uniform but the buildings, which tend to be larger, are of an equally high quality.

4.10 The Site is considered by the LBoR to contribute to the character of the Conservation Area, however this contribution is judged by this report to be limited to the south-west elevation of the Site as it retains most of its late nineteenth-century architectural composition. The rear of the Site been extensively altered and is considered to make no contribution to the high quality architectural character of the Conservation Area, as described by the Statement.

Central Richmond Conservation Area

4.11 The south-east end of the Site is located within the Central Richmond Conservation Area. This Conservation Area was designated in January 1969, and was extended five times between 1977 and 2005. A Conservation Area Statement produced by the LBoR describes its character and appearance as follows:

This is 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.

4.12 The setting of the Character Area is also notable for buildings which comprise varied materiality and colour. The Site is considered by the LBoR to contribute to the character of the Conservation Area. The south-east elevation of the Site facing George Street is judged by this report to contribute to the high quality architecture of the commercial townscape in this area as it retains its original facade at first and second floor levels and commercial function at ground floor level.

Listed Buildings

2, 4 and 6 Brewers Lane (Grade II)

4.13 This three storey building was constructed in the eighteenth century as a single dwelling house. The building is entered from 56 George Street. It comprises three bays with three sash windows; those at first floor level have segmental arched heads whilst those at second floor level are square headed. A Victorian shop front has been installed at ground floor level. Brick banding and a parapet decorate the eaves of the building. Each of 3 bays has Victorian shop front.

4.14 The building is situated opposite to the Site and derives its heritage significance from its architectural quality and collective value as part of a cluster of buildings lining Brewers Lane. The Site is considered to contribute to the setting of this building through its inclusion within this group value and its shared position at the junction between Brewers Lane and George Street.

8 Brewers Lane (Grade II)

4.15 The late-eighteenth/early-nineteenth century building is two storeys in height and painted brick. It is formed of two bays occupied by two square-headed sash windows with glazing bars. A Victorian shop front with glazing bars is located at ground floor level.

4.16 The building is listed for its group value as an historic building lining Brewers Lane. The Site is situated opposite the building and is therefore associated with this group value and considered to contribute to the building's significance.

3 Brewers Lane (Grade II)

4.17 This brick building was constructed in the early-eighteenth century, originally as part of 5 Brewers Lane. It is three storeys in height and one window wide and possesses sash windows with flush frames and a modified Victorian shop front at ground floor level.

4.18 The building abuts the Site to the north and is historically associated with its expansion in the late-nineteenth century which culminated in the demolition of the building's southern end. The Site is considered to contribute to the setting of this asset through both its historic interest and group value as a building lining Brewers Lane.

Britannia Public House (Grade II)

4.19 This early-eighteenth century brick building originally formed part of 3 Brewers Lane. It is three storeys in height and two windows wide. The south-west elevation of the building facing Brewers Lane is decorated with flush framed sash windows and a modified Victorian pub front at ground floor level.

4.20 The building is located north of the Site and derives its heritage significance from its historic interest and group value. The Site is considered to contribute to the setting of the asset through its inclusion in the group of buildings lining Brewers Lane.

12 and 14 Brewers Lane (Grade II)

4.21 This building was constructed in the eighteenth century and comprises two storeys plus an attic level. It is three bays wide and possesses three casement windows which retain their original glazing bars and a brick dentilated eaves cornice decorates the otherwise plain front elevation. At ground floor level, a Victorian shop front is positioned at no. 12 and a modern shop front at no. 14.

4.22 The building is located north-west of the Site and derives its heritage significance from its architectural quality and group value. The Site is considered to contribute to the setting of the asset through its inclusion in the group of buildings lining Brewers Lane.

Section 5

Assessment of Significance.

Assessment Methodology

- 5.1 The assessment methodology used here for assessing the significance of the identified heritage assets and their settings is based on current Planning Policy Guidance and the NPPF. Paragraph 189 of the NPPF states that planning decisions should be based on the significance of the heritage asset, and that the level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset.
- 5.2 The November 2017 consultation draft of Historic England's best-practice guidance document Conservation Principles proposes the use of three heritage interests - historical, archaeological, and architectural and artistic - in assessing what makes a place and its wider context special. These are broadly in line with the values - evidential [now archaeological], historical, aesthetic [now architectural and artistic], and communal [now part of historical] - set out in the previous, 2008 version, but are consistent with the heritage interests in the NPPF, the definitions for which are now included in the updated Planning Practice Guidance:
- archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
 - architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
 - historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

- 5.3 These values correspond to the heritage interests as per best practice guidance. In addition, the extent of value is assessed using six criteria:
- The quality and extent of survival of historic fabric.
 - The extent to which the fabric contributes to understanding of history of place and occupants.
 - The originality of the design and the contribution of features to that design.
 - Associations with history, people or events.
 - Contribution towards landmark qualities and public appreciation.
- 5.4 The level of value is assessed using five criteria: high, medium, low, neutral, and negative.
- High - the element is critical to understanding of significance.
 - Medium - the element is important to understanding of significance.
 - Low - the element makes some limited contribution to understanding of significance.
 - Neutral - the element is not negative, and could be enhanced to make a positive impact of the understanding of significance.
 - Negative - the element is harmful or intrusive and detracts from the understanding of significance.

The Site

- 5.5 No. 54 George Street is not listed, however it has been identified as a Building of Townscape Merit by the LBoR and it is located within the boundaries of both the Richmond Green Conservation Area and the Central Richmond Conservation Area.

Archaeological Interest

- 5.6 Although no investigative works have been undertaken as part of these proposals, it is clear from the research undertaken that there have been no evidence of past human activity within the proximity of the Site. As such the Site has no evidential value.

Architectural and Artistic Interest

- 5.7 The Site presents differing measurements of architectural interest relating to the multiple phases of its alteration, although all of which are limited. The principal south-east elevation of the Site derives its architectural interest from its surviving early-nineteenth century composition at first and second storey levels which maintains its proportionate symmetry and detailing that make a positive contribution to the Central Richmond Conservation Area.
- 5.8 The modern shop front at ground floor level is considered to have no architectural interest. Likewise, the rear elevation of the building, which expresses multiple phases of alteration, possesses low architectural quality and comprises an awkward amalgamation of elements, unsympathetic in their form and decorative treatment, not in keeping with other the principal elevation. The rear of the building is considered to detract from the architectural interest of the Site and the character and appearance of the Richmond Green Conservation Area.
- 5.9 The loss of fabric to the south-west elevation of the Site, facing Brewers Lane, provides evidence of the historic phasing of the Site's development and its evolved context within the group of buildings located along the street.
- 5.10 The interior of the building has also been heavily altered and its original plan has been lost. It is therefore considered that the overall architectural interest of this building is low, notwithstanding the contribution made by its south-east elevation to the character and appearance of the Central Richmond Conservation Area.

Historic Interest

- 5.11 The historic association of the Site with George Street has been maintained with relation to the maintenance of its combined residential and commercial use. The Site also contributes to the historic interest of Brewers Lane as it provides a significant portion of the boundary building line and remains physically connected to its neighbouring commercial and residential buildings. Evidence of the Site's building development, predominantly visible at the rear and south-west elevations, also possesses some historic interest.
- 5.12 The setting of No 54 George Street contributes to its significance largely through its relationship with the High Street, in terms of its historic use as a retail premise, and its adjacent passageway, which acted historically as an access for coaches, horses and other traffic to the rear of the building. What is today Brewer's Lane was predominantly an access way to the brewery and the fields to the rear likely providing pasture to livery horses.

Summary of Significance

- 5.13 Overall, the Site holds some historic significance through its age, and likely retention of some nineteenth-century fabric. In aesthetic terms, it is of an unusual architectural form, with various parts of the buildings added and amalgamated.
- 5.14 Its predominant significance lies in its contribution to the wider palimpsest of Richmond, as a readily legible building remodelled in the nineteenth century, with varied detailing and a streetscape contribution that is largely associated with its continuation of the scale of the street and symmetrical Regency architectural details.
- 5.15 It is possible that the Site might, in its internal fabric have elements of interest. However, this does not change its status as non-designated heritage asset, and it is very clear that late nineteenth century alterations have significantly removed much older fabric, including rear ranges that are visible on the 1861 OS Map.

5 | Assessment of Significance

Significance of surrounding heritage assets

- 5.16 The listed buildings surrounding the Site form part of Richmond's historic development. Their homogeneity in terms of their scale and materiality; combined with the varying bay widths and changes in roof form, combine to contribute positively to the conservation areas and is considered to be of high historic, aesthetic value. Fenestration pattern and architectural detailing further add to the interest of the street scene and townscape.
- 5.17 The Richmond Green Conservation Area is centred around the Green with good examples of late 17th and early 18th Century terraces of town houses. It also includes the peripheral parts of the more commercial and informal rear parts of George Street.
- 5.18 The Central Richmond Conservation Area on the other hand derives its significance from being part of a commercial high street, with varied townscape and consistently high quality individual buildings, intertwined with residential terraces. The significance is derived from the collective contribution of these buildings.
- 5.19 The conservation areas and the listed buildings surrounding are considered to be of high sensitivity. The area has a strong historic character and architectural quality is generally high.

Site's contribution to the surrounding heritage assets

- 5.20 It is clear from the research that the Site has undergone several phases of development and alterations. The front elevation, facing George Street, by virtue of its exterior facade on first and second floors, possess the characteristic features of the Central Conservation Area and contributes to it.
- 5.21 However, the elevation facing Brewer's Lane is fragmented and has been altered several times to form the extent of the Site as it stands today. This has led to crude infilling to originally decorative openings, windows and upper floor extensions. A 'mish-mash' of the fenestration pattern, while provides an understanding of the individual façades, results in a poorly composed architectural facade that detracts from both the Richmond Green and Central Conservation Areas.
- 5.22 Further, the poor architectural composition along Brewer's Lane, detracts from the other listed buildings along the Lane.
- 5.23 The Site does form part of the history of the area as it was originally part of the commercial townscape and residential development of the area.

Section 6

Heritage Impact Assessment.

6 | Heritage Impact Assessment

Impact Assessment Methodology

- 6.1 The impact assessment utilises the guidance as set out in Historic England’s Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment (July 2015); and Planning Note 3: The Setting of Heritage Assets (GPA3) (as revised December 2017). It is written with regard to NPPF, chapter 16, particularly paragraphs 192 to 197, with the interpretation of these policies established by current case law. The assessment further considers compliance with local policy and guidance set out in section 2.
- 6.2 The possible impacts arising from this scheme have been assessed through the following categories:
- Direct Impacts: (No direct impacts are considered to arise as a result of the proposed development)
 - Indirect Impacts (those on which the proposals have the potential to generate an indirect effect, through affecting significance via change: through the proposed change in their setting.)
- 6.3 In relation to indirect impacts on the identified designated heritage assets and, in accordance with the NPPF and other planning guidance, I propose to assess the impact of the development on the setting of the asset in the following way:
- To apply the Historic England Guidance as set out in GPA 3: The Setting of Heritage Assets, including its ‘five step’ process for assessing impacts upon setting (CD 10.6).
 - To assess whether the proposed development of the appeal site would harm the identified heritage asset’s significance, or appreciations of that significance, by generating change within its setting.
- 6.4 The ‘five step’ process for setting assessment laid out within GPA3 is as follows:
- Identify the heritage assets which might be affected, and their settings (Step 1).
 - An assessment of the contribution of the setting of this asset to their significance (Step 2);
 - An assessment of the impact of the proposals on the significance of these assets through any change that may arise to the settings of these assets (Stage 3);

4. An overview of how ways to maximise enhancement and minimise harm have been undertaken within the illustrative scheme, as an indicative approach to addressing heritage issues arising from the scheme (Step 4).

- 6.5 Step 5, which requires the making, documenting and monitoring of decision-making outcomes, is not of relevance to this Statement.

Overview of Proposals

- 6.6 The current proposals is for a change of use of the first and second floors of the Site, from its current use class A1 to a residential use class C3. These upper floors were used by the retail company Top Shop in part retail but mainly for staff areas and storage. However, due to lack of demand of similar spaces, it is considered that the optimum viable use of the Site would be the conversion of the upper floors to residential use, whilst retaining commercial use on the ground floor and basement.
- 6.7 The scheme comprises eight flats from studios to two bedrooms, including refuse storage, an enhanced cycle store.
- 6.8 The scheme also takes the opportunity to improve the south-west elevation in order enhance its contribution to the two conservation areas and the setting of the listed buildings.

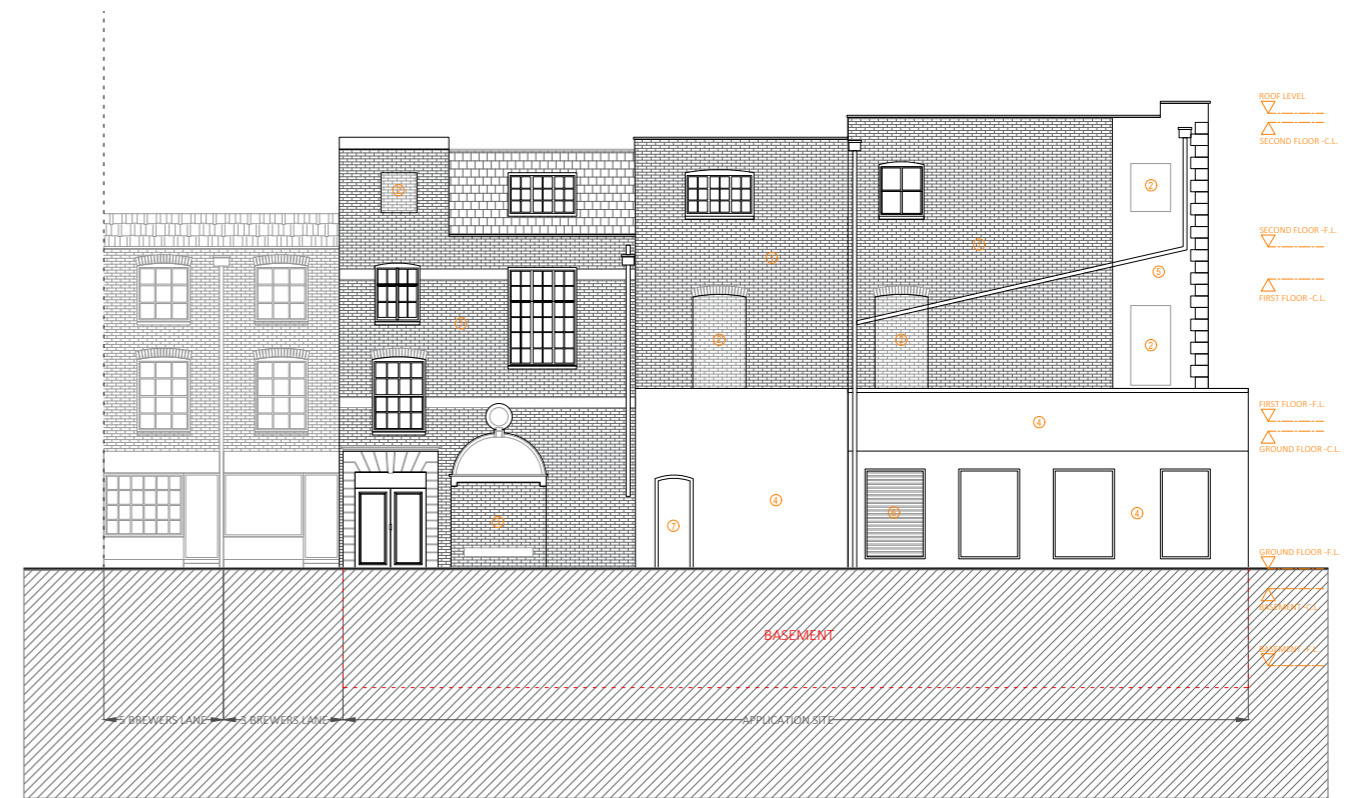


Figure 5.1 Existing south-west elevation.



Figure 5.2 Proposals for the south-west elevation.

Direct Impacts

- 6.9 The proposals will make direct changes to No 54 and result in direct changes within the Richmond Green and Richmond Central Conservation Areas. However, due to the limited nature of these changes to this non-designated heritage asset and the Site as a whole, overall the proposals are considered to maintain the significance and character and appearance of the two assets in question with no harm arising. This is set out in detail as follows.
- 6.10 The changes proposed to the Site can be grouped into three:
- changes to window/ door openings and fenestration, especially along Brewer's Lane;
 - change of use from commercial to residential of the upper floors; and
 - the modifications to the rear of the building including the provision of required amenity space.
- 6.11 The proposed changes to the openings are largely to the rear and side elevations. There are no changes to the front of the building apart from the refurbishment of the casement windows to the front.
- 6.12 The changes to the rear and side elevations largely consist of the reconfiguration of the existing openings to provide a more consistent and considered fenestration pattern. These elevations have been altered in the past, rather crudely in some instances and are considered to detract from the setting of various designated assets nearby.
- 6.13 The proposal intends to retain the style of the building through the use of sympathetic materials including timber framed windows. As such the proposal will maintain the overall narrative of the various phases of the building, leaving the three distinctive façades legible from Brewer's Lane.
- 6.14 Along Brewer's Lane, there is a blocked opening with an arched fanlight also blocked up. This is crude in appearance and was clearly done as a 'quick-fix' in the past. It is clear with the arched fanlight, stone lintel and a keystone that this was an important opening, probably for the stables. This opening is proposed to be opened up as the bin store; with a set of timber doors resembling a set of stable door. The bricked up fanlight would be opened up and revealed for the better appreciation of this elevation. This is considered to be a high level of heritage enhancement.
- 6.15 The window replacements for double glazed timber units to the side and rear are of a high quality design, with (as far as possible) a 'like for like' appearance maintaining the same detailing including the back painted timber reveals.
- 6.16 There are precedents within the conservation area for sympathetic replacement windows with double glazing. The window replacements have been carefully considered with the EPC standards requiring an upgrade of the existing fenestration, and, in our view balance the needs of the building performance and its heritage considerations very well. Whilst the modifications will alter the building to a degree, this will be noticeable only on closer inspection and not materially change appreciations of the building's visual and aesthetic appearance or contribution to the wider Conservation Areas.
- 6.17 The new side opening is proposed to be small in nature, although do establish openings in part of the building which previously did not have fenestration. However, the window proportions have been considered carefully to allow for the buildings to be read individually. The proposed openings here therefore considered to be in keeping with the character and appearance of the Conservation Area as a whole and compliment the appearance of the host building.
- 6.18 The change of use of the commercial units to further residential units is in keeping with the original use of the building. As a non-designated heritage asset internal alterations can be made without consent, although any external changes require consideration. In this case, impact on the conservation area is also of consideration. The proposals will result very limited change to the existing flank and rear elevation, but will enhance the visual frontage to George Street and Brewer's Lane.
- 6.19 Commercial uses for the building have not proved viable and the creation of further homes as part of the wider conversion of the building would be a lower impact means of providing a long-term use for the Site, rather than a separate conversion in a few years' time. This is compliant with policy which allows for conversion of commercial premises to residential in this location, where commercial is not viable.

Indirect Impacts

- 6.20 The changes to the rear include provision of amenity space by the removal of non-historic fabric. Due to the nature of this change being behind the building frontage and in an area that has been subject to multiple changes through the twentieth century, alterations here are considered to result in no adverse impact on the setting of No 54 or the Conservation Areas. Barely any change will be perceptible along George Street (the principle feature of significance) and Brewer's Lane. In addition the changes will not be perceptible from within the setting of the nearby listed buildings, causing no adverse impact on them.
- 6.21 Opportunities to better reveal the heritage significance of the Site have been identified along the south-west elevation, facing Brewer's Lane. This will be improved by the reinstatement of blocked window openings in their original position and reversing the later infill of the ground floor entrance beneath the stone arch by inserting a set of double doors. This development will greatly improve the quality of this elevation and enhance the contribution of the Site to the setting of all listed buildings along Brewer's Lane.
- 6.22 The architectural cohesion of what is currently proposed is of considerable importance and will allow for the primacy of the south-east elevation, facing George Street, to be maintained and thereby continue to make a positive contribution to the Central Richmond Conservation Area. Likewise, the proposed regularisation of the architectural composition at the rear of the Site will likely improve its appearance and consequently make a better contribution to the Richmond Green Conservation Area.
- 6.23 As explored in section 4, the setting of the identified designated assets is largely one focused on their relationship with the building line of George Street and correspondence with the frontages of surrounding buildings on Brewer's Lane. Due to the proposals affecting the rear and side, it is judged, in the most part, the setting of these designated assets will remain unaffected. Therefore, Nos 2 to 14 Brewer's Lane (Grade II) I, and Britannia Public House do not require further assessment.
- 6.24 3 Brewer's Lane (Grade II), located to the northwest of the Site warrants further consideration due to the increased inter-visibility at the rear of these buildings.
- 6.25 Firstly, because of the existing built context, and the ancillary nature of buildings to the rear of these assets, the nature of these enclosed yards is already one of built landscape and functional accesses. The rear elevation, directly visible from No 3 Brewer's Lane already contains openings. These would be reconfigured to correspond to better proportions and would therefore enhance its setting.
- 6.26 Meanwhile, the changes to levels for amenity spaces, will provide increased buffering space between the assets and converted residential properties compared to the existing.
- 6.27 The proposals therefore will result in no significant change to the baseline position of the setting of the heritage assets in question, with no harm arising to their significance via these proposals.
- 6.28 In summary, the proposed development is unlikely to cause harm to the setting or significance of any designated heritage asset, including significance derived from the character and appearance of the Richmond Green Conservation Area and the Central Richmond Conservation Area. The proposed development will maintain the Site's status as a Building of Townscape Merit.

Section 7

Conclusion.

7 | Conclusion

- 7.1 This Built Heritage Statement has been produced by Icení on behalf of Lombard Asset Ltd to appraise the Site at 54 George Street, Richmond, London.
- 7.2 The report has considered the legislative and policy context and guidance in which to determine possible heritage impacts of the Site. It has reviewed and set out the historic development of the Site and of Great Missenden more widely, utilising archive material and relevant historical mapping. In turn, heritage assets for specific consideration have been identified, namely, No 54 George Street itself, Central Richmond Conservation Area and Richmond Green Conservation Area (within which the Site sits partly), Nos. 2-14 Brewer's Lane (even), No 3 Brewer's Lane and Britannia PH.
- 7.3 The setting and significance of the listed buildings has been identified and appraised, along with the character and appearance and special interest of the conservation areas, and the non-designated heritage asset at No 54.
- 7.4 Using the assessment of significance to inform, the impact of the proposed scheme has been robustly considered, both with regard to the impact on the significance and special historical and architectural interest of the listed buildings and the special character and appearance of the Conservation Area.
- 7.5 The impact assessment concludes that the proposals are considered to propose making changes to No 54 in keeping with the original function of the building done in sympathetic materiality whilst successfully maintaining the importance of the existing frontage onto George Street. The Site currently is considered to detract from its neighbouring heritage assets and the proposal to reconfigure the openings, especially along Brewer's Lane is considered to be an enhancement. In light of these mitigations the impact of the proposal is considerably outweighed by the benefits of providing the longterm use to the building.
- 7.6 Furthermore, the significance, character and appearance of the Richmond Green and Central Conservation Areas are judged to be wholly maintained by the proposals. Further, the settings and significance of the identified designated heritage assets are considered to be maintained.
- 7.7 As such, the proposals are judged to be compliant with policy, including the NPPF, and in alignment with the statutory requirements under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Appendix 1

References.

Appendix 1 | References

54 GEORGE STREET | RICHMOND TW9 1HJ

Historic Development

OS map regression

Domesday Online

British Newspaper Archive

Britain from Above.

Policy and Guidance

London Borough of Richmond Local Plan (adopted 3rd July 2018)

Richmond Conservation Area Appraisals

Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (GPA2) (Historic England, March 2015)

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (GPA3), (Historic England, second edition, December 2017)

Appendix 2

Statutory List Entries.

2, 4 and 6 Brewer's Lane

Heritage Category: Listed Building

Grade: II

List Entry Number: 1080863

Date first listed: 25-Jun-1983

Statutory Address: 2, 4 AND 6, BREWERS LANE

County: Greater London Authority

District: Richmond upon Thames (London Borough)

National Grid Reference: TQ 17855 74894

2, 4, 6 (west side) TQ 1774 NE 20A/91

C18, perhaps originally a single house. Painted brick. Three storeys; three windows wide. First floor windows have segmental arched heads, second floor windows square headed. Flush framed sash windows. Each of 3 bays has Victorian shop front. Brick band and parapet at eaves level. Fire plaque to No 2. Now entered from 56 George Street (not listable).

<https://historicengland.org.uk/listing/the-list/list-entry/1080863>

8 Brewer's Lane

Heritage Category: Listed Building

Grade: II

List Entry Number: 1080864

Date first listed: 25-Jun-1983

Statutory Address: 8 BREWERS LANE

County: Greater London Authority

District: Richmond upon Thames (London Borough)

National Grid Reference: TQ 17849 74897

8 (west side) TQ 1774 NE 20A/95

Late C18, early C19. Painted brick. Two storeys, 2 windows wide. Square headed sash windows with glazing bars. Victorian shop front with glazing bars to ground floor. Listed mainly for group value.

<https://historicengland.org.uk/listing/the-list/list-entry/1080864>

3 Brewer's Lane

Heritage Category: Listed Building

Grade: II

List Entry Number: 1080867

Date first listed: 25-Jun-1983

Statutory Address: 3 BREWERS LANE

County: Greater London Authority

District: Richmond upon Thames (London Borough)

National Grid Reference: TQ 17850 74908

3 (east side) TQ 1774 NE 20A/38

Earlier C18. Three storeys. One window wide. Brick built with parapet. Sash windows with flush frames. Modified Victorian shop front to ground floor. Originally part of same property as No 5.

<https://historicengland.org.uk/listing/the-list/list-entry/1080867>

Britannia Public House, 5 Brewer's Lane

Heritage Category: Listed Building

Grade: II

List Entry Number: 1358054

Date first listed: 25-Jun-1983

Statutory Address: Britannia Public House, 5 Brewer's Lane

County: Greater London Authority

District: Richmond upon Thames (London Borough)

National Grid Reference: TQ 17845 74912

5 (east side) TQ 1774 NE 20A/37

Earlier C18. Three storeys. Two windows wide. Brick built with parapet. Flush framed sash windows. Modified Victorian pub front to ground floor. Originally part of same property as No 3.

<https://historicengland.org.uk/listing/the-list/list-entry/1358054>

12-14 Brewer's Lane

Heritage Category: Listed Building

Grade: II

List Entry Number: 1080865

Date first listed: 24-Dec-1968

Statutory Address: 12-14 Brewer's Lane

County: Greater London Authority

District: Richmond upon Thames (London Borough)

National Grid Reference: TQ 17837 74905

12-14 (west side) TQ 1774 NE 20A/40 24.12.68

C18. Two floors with attic. Each 3 windows wide. Brick with dentilled eaves cornice. Casement windows retaining glazing bars. Victorian shop front to ground floor of No 12, modern shop front to No 14.

<https://historicengland.org.uk/listing/the-list/list-entry/1358054>



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