



## Morelands and Riverdale Buildings

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### Public Benefits Note

#### Introduction

1. Planning permission and listed building consent has been sought for “Internal and external works to the Morelands Arcades including the provision of a fire escape and a new entrance door, the provision of an external plant enclosure to the rear of the Morelands Arcades and the provision of an electricity substation with associated works” (ref. 21/1671/FUL and 21/1672/LBC).
2. Whilst the majority of the works proposed do not have an impact on the significance of the listed building, it is recognised that the introduction of the plant screen has the potential to cause some harm. A Heritage Impact Assessment has been provided to assess the harm.
3. The NPPF recognises that where a development proposal will lead to less than substantial harm this harm should be weighed against the public benefits of the proposals. This note therefore provides a summary of the public benefits arising from the proposed works to the Riverdale and Moorlands buildings pending consideration by London Borough of Richmond under applications 21/1671/FUL and 21/1672/LBC which should be balanced against any perceived harm arising.
4. This note should be read alongside the covering letter prepared by Gerald Eve which accompanied the planning application and the Heritage Impact Assessment, prepared by KM Heritage and Plant Review pack, prepared by Chapman Architects which were submitted following discussions with officers.

#### Background

5. The Morelands and Riverdale Buildings are home to Touchlight Genetics. The overriding objective of the development is to provide additional laboratory facilities for Touchlight which will assist them in their work in the development of vaccinations related to the COVID pandemic.
6. Touchlight are currently involved in 5 separate programmes related to either the prevention or cure of COVID and are currently in discussion with Government at a high level to help facilitate their progress.
7. The sub-station, plant enclosure and scheme of proposed works are critical to the operation of the facility and its on going role in the vaccine delivery. There are therefore significant public benefits arising from the proposals and it is critical that this infrastructure is delivered quickly to assist the Government’s response to the pandemic.

#### Site and Surroundings

8. The site comprises a 0.9 hectare parcel of land bound by Upper Sunbury Road to the north, Lower Sunbury Road to the west and Thames Water filter beds to the south.
9. The majority of the site comprises the Morelands and Riverdale Buildings with a road and hardstanding to the south, and a wide green verge to the north. The Site is accessed at its western end from Lower Sunbury Road.



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10. Both the Morelands and Riverdale Buildings are Grade II Listed as are the cast railing along the northern boundary. Additionally, the Site is located within the Hampton Village Conservation Area. The Listing Description for each building is provided below:

### Morelands:

*'2. 1867-70. Engineer Joseph Quick, extended and completed 1885-6 by Engineer JW, later Sir James Restler for the Southwark and Vauxhall Water Company. Gault brick. Centre part of one storey with 2-storey end blocks. The centre range being a series of blind arches with broad segmental heads, this range being 15 bays long. Projecting end blocks with arcaded ground floor and segmental windows above basement with cornice runs the full length of the building. Windows have moulded surrounds and cast-iron honey-comb patterned glazing bars. Stand-pipe tower demolished in 1970.'*

### Riverdale:

*'2. 1898-1900. Comprises 2 connected wings: a. The engine house immediately fronting Upper Sunbury Road having a symmetrically arranged facade of 5 bays: the outer bays are advanced with full-height, triple light, round headed windows and are covered by slated mansard roofs with fishscale tiles, each with a dormer set into the face of the parapet brickwork: the second and fourth bays each have a pair of round headed windows full height and are surmounted by stone parapet balustrading: the central bay is advanced, having a triple light round-headed window beneath which is the entrance porch with a balustraded balcony. In the parapet is set the barge of the Southwark and Vauxhall Water Company in stone. Entrance gate and iron railings. b. Set behind and to the right of the Engine House. A long building of "nave and aisle" form having an arcaded ground floor with a slated lean-ton roof rising to a clerestory lighting the central area and which has a slated pitched roof.'*

### The Proposals

11. The application is supported by a Design and Access Statement which details the proposals in full and a summary is provided below.

### Morelands Arcades:

- The introduction of a louvred external plant enclosure to the rear of the Morelands Arcades with associated service penetrations;
- The provision of a double door entrance to the Morelands Arcades and new entrance to the Beam House;
- The incorporation of builders works openings and 2 doors through the existing walls from the new plant area to the Morelands Buildings and a new fire escape staircase; and
- Internal alterations to the ground and first floor layout of the Morelands Building.

### Site Wide:

- The introduction of an electricity substation to the north-east of the site to serve the laboratory use



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**Planning Policy Context**

12. The National Planning Policy Framework (2019) ('NPPF') is a material consideration in the determination of planning applications. It sets out the Government's overarching planning policies for England and how they are to be applied. Development Framework.
13. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise. The adopted Statutory Development Plan for the purpose of this application comprises The London Plan (2021) and Richmond Local Plan (2018). LB Richmond and the GLA have also published guidance on a range of topics relevant to the interpretation and application of each respective Plan. These are a material consideration to the determination of the application.
14. The London Borough of Richmond upon Thames are in the process of preparing a new local plan. The document is in the early stages of engagement – the direction of travel consultation took place in spring 2020 and adoption is scheduled for 2024. By virtue of comprising no draft policy, the emerging policy context does not form part of the planning assessment.
15. Sections 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990 require authorities to pay special regard to the setting of listed buildings and the character and appearance of conservation areas in the exercise of all planning functions.

**Planning Policy Considerations - Heritage**

16. Paragraph 192 of the NPPF is clear that local authorities, in determining planning applications, 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.
17. The NPPF at Paragraph 193 is clear 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."
18. The NPPF at Paragraph 196 sets out the approach where a proposed development will lead to less than substantial harm to the significance and special interest of the listed building. Paragraph 196 states "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."

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19. Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and taking their surroundings into account.
20. Policy LP3 of the Local Plan sets out that the Council will require development to conserve and where possible take opportunities to make a positive contribution to the historic environment of the borough. With regard to conservation areas, the policy requires development to preserve and where possible enhance the character and appearance of the Conservation Area. With regard to listed buildings, the policy requires the retention and preservation of original structure, layout, architectural features, materials as well as later features of interest.

### Planning Policy Assessment – Heritage

21. A Heritage Impact Assessment has been provided which concludes that whilst the majority of the proposed works will not have a detrimental impact on the significance and special interest of the listed building, there is the potential for the proposed new plant and screen along the northern wall of the Morelands Building Arcade to impact the ability to fully appreciate the architectural qualities of this elevation.
22. The accompanying Heritage Impact Assessment and Design Pack explain in detail why this particular location has been chosen for the plant, the extent to which its length is limited and the extent to which the design has been carefully considered to ensure any impact is minimised as far as possible.
23. The Heritage Impact Assessment concludes that “the proposals do not lead to substantial harm to or total loss of significance of a designated heritage asset and therefore comply with Paragraph 195 of the NPPF.... Any perceived harm arising from the proposal is therefore at most considered to be ‘less than substantial harm’”.
24. As referred to in Paragraph 196 of the NPPF, this harm should be weighed against the public benefits of the proposal.

### Public Benefits

25. In this case, the public benefits of the scheme are substantial as follows:
26. **The proposals are fundamental works required to support Touchlights development of vaccinations to combat the COVID global health crisis and also to provide rapidly deployed vaccines and gene therapy treatments on a globally unprecedented scale.** The output of the Hampton facility is expected to provide a pivotal and unlocking supply capability for the provision of DNA which is essential in the manufacture of mRNA and DNA vaccines, together with gene therapies covering significant current unmet clinical need. This not only treats the emergency and unforeseen situations such as the current ongoing pandemic but also is essential to move the latest developments in oncology, cardiology and a wide variety of currently incurable inherited disease from a recognised concept to a realised pharmaceutical product. It



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is anticipated the Hampton facility (once fully utilised) would represent a sixfold increase in the available supply of DNA as a critical starting material for the medicinal healthcare uses described above. Not only will this have a significant democratising effect through the impact upon the cost of goods for these medicinal products but also will represent a significant step forward, as the current supply chains have a recognised demand shortfall, which leaves 80% of the market currently unable to produce reliable product. This facility will enable lives to be saved.

27. **The new facility will provide a significant increase in jobs.** The wider refurbishment of the Morelands and Riverdale buildings undertaken to date has facilitated a 15% increase in jobs from 50 full time equivalent (FTE) roles to 67 FTE roles. The proposed works will facilitate over double the number jobs from 50 to 105 FTE roles from that originally provided on Site by the end of Q1 2022. In addition, there will be economic benefits and wider employment in the broader sector once increased production can take place by virtue of the additional supply of DNA as a critical starting material from Hampton.
28. **The proposals involve the wider restoration and refurbishment of the listed building and bringing it back into a viable use for the future.** Significant investment has been made by the Applicant to restore the buildings and return them to a viable use securing their future. The proposed works involve the minimum amount of intervention necessary to achieve the optimum result with the aim of enhancing the property's long-term viable use.
29. **High quality design and materials are proposed which respect the original building.** The proposed alterations have been designed to the highest architectural standards as the applicant seek to conserve and, where possible, enhance the existing fabric of the building. The materials proposed will ensure that they fully complement the existing building and the historical setting of the surrounding Conservation Area. The previous works undertaken are demonstrative of the emphasis that has been placed upon making that history evident in all aspects of the design and build and on the quality of the proposals.
30. **The proposed use has a strong resonance with the past. The very reason for the development of the Waterworks themselves was in direct response to the demand for clean water to help prevent then spread of disease, in particular cholera – which in itself forms part of the special historical interest of the listed building. The proposed use will therefore continue its original purpose of helping to prevent the spread of disease.** There is a genuine desire from the Applicant to find a further purpose that mirrors the original impact of the Hampton Facility (in terms of the prevention of cholera), as a site with a continuing heritage and narrative based upon harnessing scientific-led technology for social benefit. Indeed, adopting the Hampton facility for this purpose has involved significant additional burdens in terms of overcoming design and integration obstacles, to accommodate and provide for a 21st-century facility. There is, however, a genuine commitment to the area and Touchlight believe their proposals are both respectful of the Heritage prior use, whilst utilising what would otherwise (not least by virtue of its industrial heritage) be a very difficult site to preserve and re-purpose.



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### Conclusion

31. In conclusion, whilst it is recognised that the location of the plant equipment and the introduction of a plant screen has the potential to impact on the significance of the listed building, the proposal has been carefully considered in terms of height, width and position to reduce any impact as far as possible. Alternative options and locations for the plant have been considered but the proposed location is the optimum from a functional perspective and have the minimum impact on the significance of the building.
32. Any perceived harm arising is considered to be less than substantial harm with regard to NPPF Paragraph 196.
33. There are significant public benefits arising from the proposal which more than outweigh the harm.
34. The proposals would allow the overall special interest of the listed building and character and appearance of the conservation area to be preserved and therefore comply with the NPPF and London Borough of Richmond's Development Management Plan Policies DM HD1 and HD2.