

Our ref: 21.082 RUTB 07-09-21

7th September 2021

by email only

London Borough of Richmond upon Thames
Planning Department
Civic Centre
44 York Street
Twickenham
TW1 3BZ

Dear Sir/Madam

**ADVERTISEMENT CONSENT FOR INTERNALLY ILLUMINATED SIGNAGE ON THE EASTERN SIDE OF THE BUILDING ENTRANCE IN ADDITION TO THE TOWER ELEMENT OF THE BUILDING TO ILLUSTRATE THE BUILDING ADDRESS, AT 63 KEW ROAD, RICHMOND
PLANNING PORTAL REFERENCE: 10128606**

Overview

On behalf of Columbia Threadneedle Investments, the applicant, we are pleased to submit for your consideration an Advertisement consent application to install three signs to be located around the main entrance of 63 Kew Road, Richmond.

The application is accompanied by appropriate drawings in order to make an informed decision on the application. The proposed signage is proportionate to the scale and prominent location of the building and the illumination is modest and appropriate due to its close proximity to the main road and commercial setting.

Installing such signs for office buildings has become commonplace to improve wayfinding and legibility of buildings within dense townscapes such as the subject site. The signage does not detract from the Conservation Area and is entirely appropriate within the context of the area. The Conservation Area Study for Central Richmond encourages aspects such as signage to improve wayfinding within dense townscape. A brief Heritage Impact Assessment is provided below.

Heritage Impact Assessment

This Assessment follows the guidance given in Historic England Good Practice Advice Note 3: The Setting of Heritage Assets and 2: Managing Significance in Decision-Taking in the Historic Environment, and bears Paragraph 128 of the NPPF in mind in efforts to undertake a sufficiently diligent and proportionate approach: *'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should*

Planning and Design Group

London Office: 5 St John's Lane London EC1M 4BH tel 020 7549 2858

Midlands Office: Pure Offices Lake View Drive Sherwood Park Nottingham NG15 0DT tel 01623 726256

Oxford Office: Pure Offices Parkway Court John Smith Drive Oxford OX4 2JY tel 01865 985354

be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.'

The nature, level and extent of significance which would be affected by the proposal has been identified and each potentially impacted asset is commented on.

For the purposes of the statutory duty under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 the proposed development has the potential to affect the Grade II Listed Church of St John the Divine.

The subject site also makes a contribution to Central Richmond Conservation Area, though is located towards the northern extremity of that heritage designation.

Church of St John the Divine – Grade II

The site is approximately 34 metres north-west of the Church of St John the Divine.

The church itself is an early gothic revival built in 1831-6 and built out of yellow brick. The building fabric is defined by buttresses with the gable topped by elaborate spired belate.

Significance

The proposed advertisement is located south east of the Listed structure. The advertisement on the eastern edge of the building will be visible from the Grade II Listed Building, however the proposals seek to improve the overall appearance and legibility of the office building and reflects the scale of the building. The materials are reflective and in-keeping of the existing cladding on the building. As such the proposal will have a negligible impact on the Church of St John the Divine.

Central Richmond Conservation Area

The significance of the Central Richmond Conservation Area as identified within the Central Richmond, Richmond Green and Richmond Riverside Conservation Area Study¹, was designated on 14th January 1969. The study recognises that much of the area has been redeveloped in the 19th and 20th Century, however much of the historic street pattern has survived. The Conservation Area is categorised under three distinct characters one of which is Kew Road.

The assessment of Kew Road includes the railway station, a functional and bland thoroughfare which runs under Oriel House and is an important pedestrian link from the station to the Old Deer Park. The area is also characterised by narrow shops which are visually interesting.

Given the application site's relatively recent construction and unremarkable design (in the context of the local vernacular), it can be reasonably assumed that the building is of a lesser

¹ https://www.richmond.gov.uk/media/4026/centralrichmond_study3_4_17.pdf (Viewed 16-08-21)

significance than the other buildings that are located more centrally within the Conservation Area, and more strongly reflect historical architectural styles, materials and function.

Architecturally along Kew Road the area is notable for its three fine public houses, the Bull and Bush, The Duke of York and the Orange Tree. All buildings make a positive contribution to the character and appearance of the Conservation Area, although two of the public houses have painted over the bright red brick façade.

The proposals of the Conservation Area explicitly state to generally improve signage to selected important buildings and provide positive street frontages.

It is considered that 63 Kew Road makes a neutral contribution to the moderate significance of the Conservation Area. The building is located on the periphery of the Conservation Area, built much later than the main part of Central Richmond. The building is a simple and fit for purpose form, with no significance architecturally, but adds to the overall townscape of Richmond Upon Thames and does not currently detract from it. Notwithstanding this, in accordance with Paragraph 201 of the NPPF, not all elements of the Conservation Area will necessarily contribute to its significance. Whilst it is recognised that the elements of significance identified within the Conservation Area Study are not necessarily exclusive, it is quite clear that the Conservation Area's significance is largely reflected in and by the properties located within and immediately around the core of Richmond Central, not along the north eastern edge of the designation.

The advertisement proposals will ensure the local vernacular is maintained, through the use of matching materials and proportionate signage in relation to the scale of the building. The overall appearance, as an office building, will remain.

Adaptations to the office building and surrounding complex's is commonplace, clearly evident in the immediate locality with personalised entrances and signage according to the use of the building, which have successfully been integrated and in-keeping with the aesthetics of the Conservation Area.

Assessment of Impact

The relationship between the application site and the Conservation Area is maintained; the proposed extent and nature of the proposals are characteristic of the townscape. The character and appearance of the Conservation Area will be fully preserved as a result of the proposals which are compatible and complimentary of the office building, improving the legibility and purpose of the building.

As the Conservation Area Appraisal states, there is no distinctive local vernacular of 63 Kew Road, and the proposal does not detract from the existing appearance and fabric of the subject site, therefore no harm is caused to the Conservation Area as a result of the proposals.

The proposal will not create additional sensitivity upon the Conservation Area as a heritage asset, whereby its significance might otherwise be devalued. Ultimately, given the scale, character, appearance and general improvements to the office building, the proposals could not, in any reasonable assessment, be considered to result in harm to the Central Richmond Conservation Area. This point is emphasised as the subject site has already undergone

adaptation and personalisation. As such, the proposals are in accordance with the Conservation Area Study and Local Plan Policy LP3 in the London Borough of Richmond Upon Thames Local Plan which refers to the conservation and enhancement of heritage assets in the Borough.

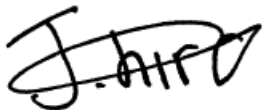
Summary

The proposal would deliver the necessary signage to improve the legibility of the office building. On this basis, we look forward to the application being positively determined at the earliest opportunity.

The application has been positively prepared and sought to understand and respond to site constraints, in turn minimising and mitigating any potential adverse impacts.

For the reasons set out in this letter, the overall planning balance weighs in favour of the application and should be supported by the local planning authority and therefore we request that planning permission is granted without delay.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J. HIRD', written in a cursive style.

**Jessica Hird BA(Hons) MA AssocRTPI
Planner and Urban Designer**