

that changes and gets better and better the higher one climbs."



Plate 25: Proposed Viewpoint 5 (summer) with wireline of the proposed development (yellow line is non visible extent and blue line is visible extent).



Plate 26: Proposed Viewpoint 5 (winter) with wireline of the proposed development (yellow line is non visible extent and blue line is visible extent).

Summary

- 7.40 The proposals are therefore considered to represent a considered and informed design which takes into account the important elements of the Registered Park and Garden and the 'landscape and river setting' of this part of the Conservation Area. The current built form on the site does not make any contribution to the significance of the Registered Park and Garden, nor the Conservation Area, and the newly proposed built form will be of a higher architectural quality which is in better keeping with the built form in the immediate surroundings. However, the proposals will remove grassed areas which fall within the boundary of the Registered Park and

Garden.

- 7.41 It is therefore considered that the development will result in only very limited harm to these assets, apparent within their bounds and through t changes to views from the wider landscape. Such harm would be classified as less than substantial harm, at the lowermost end of the spectrum.

8. Conclusions

Archaeological resource

- 8.1 The site is located within an Area of Archaeological Potential which covers Richmond. However, the landscaping and construction of the existing development within the site is likely to have disturbed or removed any earlier remains within the site.
- 8.2 No prehistoric activity has been recorded within, or immediately adjacent to the site. Prehistoric finds and features in the wider area include Palaeolithic, Mesolithic, Neolithic, Bronze Age and Iron Age residual finds which were focused in the area of the River Thames and its vicinity, as this was an area known for the focus of settlement. There is no current evidence to suggest that prehistoric activity was focused within the site and the potential for significant archaeological remains of this date within the site is considered to be low.
- 8.3 No Romano-British finds or features have been recorded within the site and only one residual findspot was recorded in the study area. There is no evidence to suggest that the site was the focus of Roman activity and the potential for significant archaeological remains of Romano-British date within the site is considered to be low.
- 8.4 The site was not a focus for medieval settlement, which was located further the north. The site and the wider surrounds were formerly part of the Royal Manor of Richmond since Domesday until the enclosing of Richmond Park by King Charles I in c. 1635. The potential for significant archaeological remains of medieval date within the site is considered to be low.
- 8.5 The site is located within the Terrace and Buccleuch Gardens which the site was incorporated into during the 1920s. The existing development within the site was constructed in 1971 and comprised three blocks of flats. The buildings within the site are not considered to be of heritage interest. Any potential below-ground remains of the post-medieval park and gardens are likely to have been removed during the landscaping and construction of the site. The potential for significant archaeological remains of post-medieval to modern date within the site is considered to be low.

Designated heritage assets

- 8.6 With reference to the levels of harm in the NPPF, the proposals will result in 'less than substantial harm' at the lowermost end of the spectrum to the significance of the Registered Park and Garden and Conservation Area due to the replacement of existing open landscape on the site with built form.
- 8.7 As per Paragraph 202 of the NPPF, this harm should be weighed against the public benefits of the proposals, including any heritage benefits. One such heritage benefit includes the replacement of built form which makes no contribution to the

significance of the identified assets with higher quality built form. The other public benefits are outlined within the submitted Planning Statement provided by Pegasus Group.

Sources

Legislation and Policy Guidance

English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

Historic England, *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2* (2nd edition, Swindon, July 2015).

Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd edition, Swindon, December 2017).

Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

Ministry of Housing, Communities and Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, July 2021).

Ministry of Housing Communities and Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23rd July 2019), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

UK Public General Acts, *Ancient Monuments and Archaeological Areas Act 1979*.

UK Public General Acts, *Planning (Listed Buildings and Conservation Areas) Act 1990*.

UK Public General Acts, *Planning and Compulsory Purchase Act 2004*.

Court and Appeal Decisions

Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697.

Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin).

R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.

Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137.

Jones v Mordue [2015] EWCA Civ 1243.

Cartographic Sources

1741-45 John Rocque Map

1850 Ordnance Survey Town Plan (1:5,280)

1871-74 Ordnance Survey Map (1:10,560)

1871 Ordnance Survey Town Plan (1:1,056)

1879 Ordnance Survey Map (1:2,500)

1895 Ordnance Survey Town Plan (1:1,056)

1896 Ordnance Survey Map (1:2,500)

1896 Ordnance Survey Map (1:10,560)

1898 Ordnance Survey Map (1:2,500)

1898-99 Ordnance Survey Map (1:10,560)

1913 Ordnance Survey Map (1:2,500)

1915 Ordnance Survey Map (1:10,560)

1920 Ordnance Survey Map (1:10,560)

1934-35 Ordnance Survey Map (1:10,560)

1936	Ordnance Survey Map (1:2,500)
1938	Ordnance Survey Map (1:10,560)
1948-50	Ordnance Survey Map (1:10,560)
1955-66	Ordnance Survey Map (1:10,560)
1960	Ordnance Survey Map (1:2,500)
1960	Ordnance Survey Map (1:1,250)
1975-76	Ordnance Survey Map (1:10,000)
1976-92	Ordnance Survey Map (1:10,000)

Appendix 1: 2017 Pre-Application Response

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27 March 2017

Dear Mr Zanardo

Town and Country Planning Act 1990 (as amended)
Howson Terrace, Richmond Hill

Thank you for your pre-application submission for the redevelopment of Howson Terrace received on 13 January 2017, I apologise for the delay in this written response.

It is understood that the proposal involves the demolition of the existing buildings (comprising three, 2-storey blocks of 24 flats) and redevelopment to provide Category 1 retirement housing for those aged 65 and above within a building ranging from 3 to 6 storeys in height.

This pre application submission follows initial conversations with officers where a concern was raised with regard to size, height and mass. The principal issues relevant to your proposal have been summarised below and as set out in our meeting of 23 February 2017.

Policy context

At the Cabinet meeting of 13 December 2016 the Publication version of the Council's updated Local Plan was agreed for public consultation between 4 January and 15 February 2017 and it was also agreed that the policies would be adopted and used for development management purposes immediately. Therefore, the existing Core Strategy and Development Management Policies as well as the emerging Local Plan policies will need consideration.

As set out in the meeting, I do not intend to duplicate a large swathe of the text within local policies within this letter although I have set out below the policies I consider relevant (and may not be exhaustive) to the development sought and site constraints. These are set out on Richmond's website and should be self-explanatory in how they relate to this development.

The London Borough of Richmond upon Thames Core Strategy:
CP1, CP2, CP3, CP4, CP5, CP7, CP10, CP14, CP15.

The London Borough of Richmond upon Thames Local Plan:
DM SD1, DM SD2, DM SD4, DM SD5, DM SD7, DM OS2, DM OS4, DM OS5, DM OS6, DM OS11, DM HD1, DM HD3, DM HD4, DM HD7, DM HO5, DM HO6, DM TP2, , DM TP8, DM DC1, DM DC4, DM DC5, DM DC6.

The London Borough of Richmond upon Thames Publication Local Plan:

LP1, LP3, LP4, LP5, LP7, LP8, LP12, LP13, LP15, LP16, LP17, LP18, LP20, LP22, LP34, LP35, LP36, LP37, LP38, LP44, LP45.

Land Use

In principle the case for remodelling of sheltered housing by a Registered Provider can be supported, provided an application sets out full justification as set out in policies DMHO5 and LP37.

It is understood that Housing & Care 21 wish to redevelop the site, as it does not meet the current sheltered housing offer, and there are many concerns regarding the current scheme. Although it is understood to be generally fully let, the scheme would require significant repairs, maintenance and investment, to address issues such as damp, lack of inclusive access etc.

It is noted that the proposal is to redevelop the site and to retain sheltered/retirement housing, to re-provide the existing 24 x 1 bed flats for affordable rent, as a replacement of the existing flats, and additional accommodation to provide a total of 40 units, with the additional 16 units stated to be retirement housing for affordable shared ownership and outright sale.

Policy DMHO5 Housing to Meet Specific Community Needs states that the loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that the accommodation is no longer needed, or that the existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere, or the new accommodation will instead meet another identified priority local need. This approach is continued in Policy LP37.

Under Policy DMHO5 paragraph 5.1.34 in the Development Management Plan it recognised as a priority the remodelling of older peoples sheltered accommodation. Paragraph 9.4.9 in the Publication Local Plan also states current housing priorities include remodelling of older peoples sheltered accommodate to provide self-contained units. The Council priority is generally for conventional housing including affordable housing, reflecting the priority need set out in Local Plan evidence and the Council's housing strategies, in line with Policies CP15 and LP36.

The Council's Retirement Housing Review (October 2016)

http://www.richmond.gov.uk/retirement_housing_review.pdf aims to inform decision-making by the Council's housing, health and social care commissioning functions, as well to assist providers of retirement housing when reviewing existing stock or developing new schemes. It recognises the vast majority of the retirement housing units in the Borough are one bedroom and studio properties and suggests Registered Providers should consider continuing to remodel and modernise accommodation which is deemed to be unsuitable to ensure that the retirement housing available is high quality. It states providers should

minimise the loss of social rented units and disruption to existing residents and communities. It estimates that 145 additional units of retirement housing are required to address the current shortfall of supply and likely increase in demand, across 3 or 4 schemes in the borough and sets a timeframe of 2020 for the delivery of these units. These figures include remodelling existing units. It recommends a mix of market scale, intermediate sale and social rented units (76 should be sold at market rates, 35 units for intermediate sale and 34 social rented units). It states developers of retirement housing should engage with the Council to ensure that they bring forward retirement housing products which are viable and meet local needs in relation to housing and infrastructure.

In principle given the re-provision of existing units and the opportunities to improve the existing standard of accommodation for occupiers, aid the management of the units and improve inclusive access, can be detailed in an application to address Policy DMHO5.

Policies CP15 and LP36 expect at least 50% on-site provision of affordable housing on large sites, and seek an 80/20 split between rented and shared ownership. Rented units would need to comply with the Council's adopted Tenancy Strategy with regard to Affordable Rent and shared ownership units would need to comply with the affordability requirements of the Council's adopted Intermediate Housing Policy Statement and accompanying marketing guidance.

The Supporting Statement suggests the proposal is to replace existing social rent properties with affordable rent, however this would require further discussion about proposed rent levels; it is assumed that returning residents would be offered homes as social rent. It states to 'self-finance' the scheme, additional units will be for shared ownership and market sale. It will need to be justified that existing tenants can be accommodated, and there is a need to ensure affordability for new tenants. The proposal will provide at least 60% as affordable rented units; the number of affordable homes will increase subject to clarification of the proportion that will be for market sale.

It is recognised that it may be considered appropriate to include an element of market housing to enhance viability. Further discussions with the Council's housing development officers will be necessary in order to ascertain that the proposal has been satisfactorily explored with the Council - to influence the tenure mix, design and explore funding streams, to address policy requirements. Clarification about rent levels for the re-provided units to ensure affordability for returning residents and to comply with the Tenancy Strategy is required and the proposal should secure nomination rights to the rented units for the Council, subject to further clarification about the number of existing tenants who will occupy re-provided homes. This will also need to address a decant strategy. Overall the Council needs to be satisfied that the delivery of on-site affordable housing has been maximised to address policy requirements. It should be noted that full public disclosure of financial information should be expected to inform transparent decision-making. This evidence of discussions, in relation to funding and viability, are necessary to accompany an application to satisfy the requirements of the Local Validation Checklist.

Policy DMHO4 requires family housing outside of town centres. The mix should be informed by the proposed tenure. For sheltered accommodation/retirement accommodation it is recognised that a mix of 1 and 2 beds is appropriate to include opportunities for downsizing, which could accord with Policies DMHO5 and LP37.

The standards set out in Policies DMHO4, Policy LP 35 (B) and the Residential Development Standards SPD should be addressed. Since 1 October 2015 the Council has been applying the nationally described space standard. This sets a minimum gross internal floor area of 50sqm for a 1 bed 2 person one storey dwelling and 61sqm for a 2 bed 3 person one storey dwelling. The proposed unit sizes appear to meet these standards.

I note there are four flats proposed at lower ground floor. The Supplementary Planning Document: Residential Development Standards states 'Habitable rooms within basements should be preferably dual aspect to enhance cross ventilation and good daylight levels to otherwise compromised living conditions. Generally basements should be used for non-habitable or recreational areas rather than bedrooms or living rooms.' It states 'Single unit flats should not be located solely in full basements.' No elevations are provided and it is appreciated that there is a difference in levels across the site, so it may be that the description of lower ground floor is more accurate, rather than a fully fledged basement level.

The Council still seeks the provision of external amenity space in accordance with Policy DMHO4 and the Residential Development Standards SPD, and Policy LP 35 (C and D). The Supporting Statement states that the balconies, designed for active use, will provide for the one bed flats a minimum balcony area of 25sqm, increasing to a minimum of 30sqm for two bed flats. This would provide for a good level of amenity; however the proposed balconies would need to be assessed against the criteria set out in Policies DMDC6 and LP 8 (3) Amenity and Living Conditions.

Policy CP14 requires all new homes should be built to Lifetime Homes Standards and 10% to wheelchair standards. Since 1 October 2015 90% of new housing would be expected to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% would be expected to meet Building Regulation Requirement M4(3) 'wheelchair user dwellings'. This is set out in Policy LP35 (E). The Council's Retirement Housing Review (October 2016) states providers of retirement schemes should try to ensure that units are built to the optional higher Building Regulations as this would maximise accessibility and allow for these units to be more easily adapted to match residents' changing needs. This should be addressed in an application and it may be relevant to secure this by condition.

Design and impact on heritage assets

As set out in the meeting there are a number of constraints relating to this particular site. It is sited within the Richmond Hill Conservation Area and forms part of the Terrace House and Buccleugh Gardens, which is designated as Historic Park and Garden. It is also within an Archaeological Priority Zone.

Adjacent to the site (north east to south east) is designated Public Open Space, Metropolitan Open Land, Other site of Nature Importance, Thames Policy Area and within and adjacent to Protected View Lines.

With the site being within the Registered Park & Garden, it is noted that the existing buildings are at least very self-effacing, receding into and allowing the historic landscape to remain dominant.

The response to the aforementioned comments from officers is noted with the attempt to break up the massing through a range of heights and series of terraces along with the introduction of greenery within the balconies and to the roof.

In terms of the design, officers remain concerned with the proposed height and massing of the block which would be considerably higher than the existing buildings and occupying a larger footprint. While the balconies offer an opportunity to introduce greenery these also add an element of clutter to the façade drawing attention to the building in this sensitive location.

Interestingly, I am led to believe that the designation of the Historic Park and Garden was made after the current buildings were built. This is somewhat unusual and relevant as in some case similar designations deliberately skirt around built form to exclude it from the designation so there was good reason for its inclusion despite its limited architectural and historic merit. In this respect however there is a historic association and setting in the landscape, tucked in within the surrounding trees.

The concern in relation to height is that the proposal would punctuate the skyline and the tree line and could therefore be visually intrusive in its surroundings. The footprint of the building would result in a continuous block and could be read as being of substantial mass and whilst the introduction of glazed linkages could be successful this will depend on the execution and how this can be demonstrated to limit the appearance of the scale, bulk/mass.

A relatively modern approach to the design may be acceptable and it is recognised that such a design may facilitate a reduced mass as well as the ability to incorporate features such as the green roof. The green roof is welcomed as it would allow the building to assimilate with the surroundings that may not necessarily be readily achievable in a traditional approach to design.

In relation to views, there is a specific view which cuts through the site, from Richmond Hill towards Asgill House to the north west, providing views of the river and the listed structures of Richmond and Twickenham bridges. The site is also contained within wider views from Richmond Bridge looking east and on the periphery of the wider views from Richmond Hill looking south west and from the west side of the River Thames looking east/northeast towards Richmond Hill and across Petersham Meadows.

While there are no Buildings of Townscape Merit or listed buildings sited immediately adjacent to the site, it will be important to ensure that the setting of those buildings, positioned below and above the site on this prominent slope and their positive contribution in the wider conservation area is not prejudiced. Any increase in height and mass may affect such a setting were this deemed to be intrusive (in the foreground or background) and seen in the context of the prominent views set out above.

Any interruption in the skyline, above the tree line and obtrusiveness within the protected views will be resisted and particular attention to these views is required in a townscape and visual impact analysis which shall be submitted with an application.

The Thames Landscape Strategy <http://thames-landscape-strategy.org.uk/wp-content/uploads/2015/01/9hham-2014.pdf> doesn't specifically refer to this development or the buildings in the vicinity although it recognises the importance of the views and the landscape setting.

The conservation area statement states that the townscape is subservient to this landscape, trees and the topography of the hill where there may be development pressure which 'may harm the balance of the river and landscape-dominated setting, and the obstruction or spoiling of views, skylines and landmarks' and this is echoed in the conservation area study.

The Study recognises the 'substantial amount of duller inter-war and post-war flat development and that trees soften the junction between old and new'.

Clearly, the detail will be telling and views of the development from a variety of areas will be critical in demonstrating if the proposal will protect and preserve the setting of the wider environment and the designations in place.

Whilst the site is visually secluded, it is difficult to see how a proposed building of this scale could be acceptable in terms of impact on the Terrace Gardens Registered Park & Garden, and, although screened by trees, may also impact on the View from Richmond Hill. Your attention is drawn to the Local Plan Consultation Draft section 4.3.5. This guidance should be followed for a site of this sensitivity, the significance of heritage assets, how the proposals protect these and how particular attention has been paid to scale, design etc.

Transport implications

The application site is located within the Richmond Hill Community Parking Zone operating Monday to Saturday from 8.30am to 6.30pm. The council's transport planners note that residents of Howson Terrace have not had any residents permits issued historically or currently and thus request that any application coming forward should consider entering into a legal agreement removing access to resident/business/all zone parking permits and contracts in council run car parks for all units proposed.

They also that membership of car club should be secured through such a legal agreement for those units without provision of off street parking.

While off street parking is shown within the lower ground of the development, it is not clear how many parking spaces are proposed, how this space will be used for turning and what amount would be reserved for staff parking. Your attention is thus drawn to the maximum parking standards set out in the Local Plan. Any shortfall will require justification notwithstanding the extent of the CPZ hours as these would not preclude parking on surrounding roads in the evening when there may be more pressure for on street parking spaces.

An application will require demonstration on how refuse/recycling would be collected from the development.

It is noted that cycle parking would be provided in the lower ground level. Cycle parking using Sheffield style stands for this development will be required with separate storage for the flats and assisted care facility. Staff cycle parking will also be required to be provided in a secure, weatherproof and enclosed facility also separately from the two facilities mentioned previously.

Consideration should also be given to additional ground floor cycle parking for visitors and within an area benefitting from good surveillance and provision for electric buggy parking for residents.

A Construction Method Statement is required in draft given the 'one way' system of Richmond Hill and the narrow entrance/exit to the site.

On a minor point, the ramp gradient to the car park will be required and how the ramp be managed as it appears too narrow for two cars to pass each other. It is assumed a traffic light system may be employed and details of this and vehicle waiting space will be required.

Trees and woodland

The Council's arboriculture officer notes that an investigation concludes that the proposal is within a conservation area and that trees are visible throughout the site with a high concentration on the eastern and southern boundary.

In its current form there are concerns regarding the potential loss of trees within the site and the possibility of excessive shading to properties on the east of the site. Any application submitted shall clearly demonstrate that the development can coexist with the surrounding trees without the potential pressure to significantly lop or fell these where outlook (bearing in mind that the design seeks to maximise views of the River Thames and Richmond Park) and access to light for future occupants may be prejudiced.

It is recommended that a suitably qualified and experienced Arboriculturalist is commissioned to establish tree related constraints and therefore assist with the overall design and any future application includes the submission of an Arboricultural Report, including a Tree Protection Plan and Arboricultural Method Statement, which should be produced by a suitably qualified and experienced Arboriculturalist and be in accordance with British Standard 5837:2012 Trees in relation to design, demolition and construction - Recommendations.

Ecology/biodiversity

The Council's ecologist has no in principle objections, but states that it is essential the amount of green landscaping and as many of the existing trees remain so there is no disturbance to the buffer between Terrace Gardens and the urban setting river side of the river.

As part of any application, you are required to provide a Preliminary Ecological Appraisal with additional badger (badgers are in the area) and possibly bat surveys (bats are in the area including the possibility of roosts). It will be beneficial to include ecological enhancements (for invertebrates, bats, birds, badgers if applicable, with a potential for a green wall depending upon the difference between existing and proposed green open space) which includes a plan, specifications and maintenance.

In addition, the proposal should be accompanied by landscaping plans, specifications and maintenance and a lighting plan, including a lux contour plan and specifications.

Some concern has been expressed regarding light spill with mitigation required such as tinted glass facing Terrace Gardens to prevent additional such light spill onto the gardens and also allow continued commuting bat corridors for a 10 m corridor.

Neighbour amenity

The pre application submission has provided limited detail (aside from the site photographs) in relation to the surrounding development and no site visits/inspections are undertaken on such pre application submissions.

The relationship between the proposed development and the residential units to the west and north of the site requires careful consideration. Regard will be given to the existing relationship but with the proposed increase in height, scale and mass coupled with the elevated position to the east with the inclusion of balconies, the development may give rise to an un-neighbourly development.

It would be prudent for an application to provide the relevant information to demonstrate that a proposal would not lead to unreasonable loss of light and outlook and will not appear overbearing, dominant and intrusive.

Sustainability

Your attention is drawn to the sustainability requirements set out in the Local Plan and the Supplementary Planning Document: Sustainable Construction Checklist. While it is acknowledged that the proposal would be likely to improve the carbon footprint and offer other sustainable improvements this has to be assessed against the loss of the existing buildings.

Any forthcoming applications will require the completion of the sustainable construction checklist and where applicable, provide a BREEAM pre assessment compliance check to demonstrate that an 'excellent' rating can be achieved. In addition, an energy statement and report shall be submitted demonstrating the carbon dioxide offset. From October 2016 zero carbon standards apply to all new major residential development (10 or more housing units) in line with London Plan policy 5.2. This means that at least 35% of regulated CO2 emission reductions (against a Building Regulations Part L (2013) baseline) must be achieved on-site, with the remaining emissions, up to 100%, to be offset through a contribution to the Council's Carbon Offset fund.

The price of carbon is £60/tonne over 30 years in line with the London Plan pricing.

Community Infrastructure Levy

Your attention is drawn to the CIL Regulations and while some elements of the proposal may be exempt from CIL this is required to be clearly set out in the submission.

Summary

While there is no objection in principle to the proposal, this is subject to demonstrating the level of redevelopment is justified in a number of areas. Subject to demonstration, it is understood that the existing buildings are reaching the end of their lifespan and beyond repair, refurbishment and extension that would be financially viable. Given the existing use and sensitivity surrounding this and the requirement to provide some enabling development, a careful balance is required in assessing the impact, particularly around the design and massing of the scheme.

Officers remain concerned that the overall bulk, height and scale would not be appropriate in this setting and such harm may not necessarily be outweighed by securing the long term future of the existing housing.

Without prejudice

Any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstances may change or come to light that could alter the position. It should be noted that if there has been

a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes.

(You are also advised to refer to local and national validation checklist on the Council's website)

Yours sincerely

A handwritten signature in black ink, appearing to be 'R Angus', written in a cursive style.

RP Mr Robert Angus
Head of Development Management (Richmond)
Serving Richmond and Wandsworth Councils

Appendix 2: 2020 Pre-Application Response

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BY EMAIL ONLY

30 June 2020

Dear Mr Rainey,

Town and Country Planning Act 1990 (as amended)
Howson Terrace, Richmond Hill

I write further to your meeting with Wendy Wong Chang held on 4 May 2020. This advice is based on your most recent proposal and essentially updates the previous pre-application advice provided to you in 2017.

This pre-application submission follows previous conversations you have had with officers where concerns have been expressed with regard to size, height and mass in relation to the identified heritage assets. The principal issues relevant to your most recent proposal have been summarised below and have been set out to you in previous meetings. Given the similarities with the scheme previously presented, much of this information reiterates/updates the previous written advice that has been provided to you.

Policy context

As set out previously the main relevant policies to the development remain as follows although there have been more recent updates to SPD. These are set out on Richmond's website:

Local Plan (2018):

LP1, LP3, LP4, LP5, LP7, LP8, LP10, LP12, LP13, LP15, LP16, LP17, LP18, LP20, LP22, LP34, LP35, LP36, LP37, LP38, LP44, LP45.

Adopted Supplementary Planning Documents;

- Buildings of Townscape Merit (2015)
- Residential Development Standards (2010)
- Affordable Housing (2014)
- Sustainable Construction Checklist Guidance Document (2016)
- Design Quality (2006)
- Transport (2020)
- Refuse and Recycling Storage Requirements (2015)
- Small and Medium Housing Sites (2006)
- Planning Obligations SPD (2020)
- Air Quality (2020)
- Development Control for Noise Generating and Noise Sensitive Development (2018)
- Richmond and Richmond Hill Village Plan (2016)

All relevant policies can be accessed from Council's website via link below:

https://www.richmond.gov.uk/services/planning/planning_policy/local_plan

Note that the New London Plan is in its final stages of preparation and I would anticipate likely to be adopted before any planning application pursuant to this proposal is submitted. The policies therein are currently given weight as a material planning consideration and once adopted will form part of the Development Plan. The standards set out in the Intend to Publish Plan policies should therefore be built into your consideration of the scheme at this stage, notably for example on sustainability standards, air quality and parking.

Land Use

The Council is in general supportive of the principle of proposed development to provide 'affordable' retirement apartments by a Registered Provider provided the justification/requirements set out in policies LP37 and LP36 are fully addressed.

The scheme is now for 30 no. units (27 x 1 bed and 3 x 2 bed) be offered to people of retirement age (over 55 years), although the specific tenure mix is yet to be agreed. I note the covering letter requests the Council provides advice in relation to the preferred mix, although this is linked with the need for clarity on tenure (mix of rented or shared ownership, affordability levels) as such it would be useful to know if the decant strategy includes re-provision for those residents who have been moved to other schemes. Further discussions with the Council's housing development officers will be necessary in order to ascertain that the proposal is satisfactory in terms of tenure mix, design and explore funding streams, to address policy requirements in LP36.

The Housing Officer has commented that previous correspondence and research confirms that Council's nominations agreement with Housing 21 enables the applicant to allocate 25% of their available properties to tenants of their own choosing (Council have rights to nominate the remaining 75%) to allow flexibility to cater for these circumstances. This amounts to 22 of

the current total of properties (30) in the current scheme. The Council would therefore expect the new proposed scheme to include retention of these rights as a minimum, unless it can be demonstrated that a lesser percentage is the maximum viable through submission of a financial appraisal in the normal way.

Council's starting point will be to deliver 22 of the proposed homes as a minimum as London Affordable Rent with the remainder being for Shared Ownership/Shared Equity. As the scheme includes 3 x 2bed units it would be preferable if these are provided for rent, suitable for occupation by a single person with carer space included. Given the location on Richmond Hill it seems unlikely that any homes for sale would meet our Intermediate Housing Policy requirements. This will be a matter for clarification with Housing 21 as the scheme progresses.

However, to note is that the baseline requirement is 75% of the total number of units to be proposed in any subsequent schemes.

In view of the above, you are strongly advised to engage with Council's Housing Officer to agree on the tenure and unit mix prior to the preparation of a formal application and it was agreed at the meeting that the applicant will undertake separate discussions directly with Paul Bradbury on this matter.

Design and impact on heritage assets

Without re-iterating the site description/constraints in this pre-application advice, I would like to focus mainly on the current scheme in design terms.

The current scheme has been designed to follow the contours of the site and steps down from 5 storeys on the northern end to 3 storeys on the southern end. Projecting bays, balconies and terraces have been introduced to add visual interest on both the front and rear elevations.

Whilst there are no objections to the more organic design approach presented under this submission, which is considered an improvement to earlier schemes, concerns remain in relation to the overall height, scale and massing which is still considered to be excessive in this very sensitive location. You are therefore advised to consider exploring a reduction in height by one storey across the entire scheme with the taller element remaining on the northern end. The reduction in height may also address the impact on residential amenity of the occupants at Robin Court set out in detail in the following section on 'Amenity'.

In terms of the visuals, these are mostly of long views towards the site and they demonstrate that there is very little change in terms of visual impact in the selected views from the earlier pre-application submission. However, as highlighted in the meeting by both Marc and Wendy that of most concern with the current scheme is the impact within Terrace Gardens, and from Richmond Hill, as the current scheme is still considered to detract from the special landscape qualities of the location.

It is also noted that the visuals are summer views, with the trees/leaves obscuring the site. Irrespective of the density of existing trees and vegetation within Terrace Gardens, there will

be points closer to the development itself, where there will be additional scale impact which the Council objects to.

Whilst the site may be screened by existing trees in Terrace Gardens, however any scheme would still need to have consideration to the overall setting, character and appearance of the heritage assets that the site adjoins and it is not considered the current scheme has satisfactorily addressed the harm previously identified.

As previously advised, the NPPF and local policies require that an applicant describe the significance of any heritage assets affected. The NPPF continues to state that, "significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional."

Within the details provided so far, there has been no meaningful analysis made of the significance of this site's inclusion within the Historic Park & Garden designation. In the absence of this and given the scale of the development, at present there is no reason for the Council to conclude that the level of harm to the heritage asset would not be substantial by destroying the significance of this area of the designation. The NPPF continues that where a proposed development will lead to substantial harm or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

Therefore, we would reiterate our previous advice, that in the immediate short-term to assist in your deliberations as to whether to progress with the scheme, and to inform the weight to be attributed to the harm/benefits in the planning balance, we advise you to:

- Continue a dialogue with Housing to ensure that they can fully support and confirm the benefits of the scheme. The details on tenure would be vital to setting out the benefits.
- Approach Historic England and the Gardens Trust to assist with the assessment of the contribution that this element of the registered park and garden makes to the listing and the impact of the scheme on the heritage asset

In terms of a contact at the Garden Trust, I set this out again:

E-mail: office@londongardentrust.org

Turning to the roof terraces, these are considered to be an incongruous design feature and given each flat benefits from their own private amenity space, it is not considered these to be necessary and it is suggested that these are omitted and replaced with green roof to better improve on the sustainability benefit of the scheme.

In terms of materials, there are no objections to the use of bricks though the use of more modern materials may be suitable provided it can be demonstrated that they will harmonise with the overall appearance of the conservation area and the locality in general.

Overall, it is not considered that the design and siting of the proposed building can be undertaken in isolation without fully understanding the constraints of the site and adjoining sites. Further constraints may be identified following the preparation of an AIA as there may be need to re-site certain parts of the scheme to ensure the health and longevity of all on and off-site trees are maintained. This will be discussed in more detail in later sections of this report.

On a separate note, should you choose to progress to a formal application, we would encourage you to consider presenting a subsequent amended scheme to the Design Review Panel and further details can be found from our website via link below:

https://www.richmond.gov.uk/services/planning/richmond_design_review_panel

Housing Mix and Standards

The final tenure mix/unit type would need to be justified with evidence of discussions with Paul.

Policy LP 35 (B) requires new housing to comply with the nationally described space standard. The unit sizes shown on the proposed plans appear to exceed the relevant standards. A Residential Standard Compliance Statement will need to be submitted with any future application.

The requirements of Policy LP35 (C and D) and the Residential Development Standards SPD apply to external amenity space. A minimum of 5 sqm of private outdoor space for 1-2 person dwellings plus an extra 1 sqm should be provided for each additional occupant. The plans show the flats all have access to private amenity space in the form of balconies. Given the concerns raised in relation to the balconies on likely impact on residential amenity of nearby occupants in Robin Court, balconies may need to be re-sited/omitted from future schemes and an alternative form of private amenity space would therefore need to be explored to satisfy the above requirements.

There are concerns to the quality of accommodation, in particular to the bedrooms to the units sited at Lower Ground and Ground floor levels which may be affected by existing site constraints as they may be significantly overshadowed by existing off-site trees. Whilst no information has been submitted at this stage, a section through each bedroom to units, in particular those identified as 0.04, 0.05 and 0.06 in the LG floor plan will be necessary to demonstrate they can all benefit from adequate daylight/sunlight, ventilation, outlook and openable windows. Substandard layout and accommodation will not be accepted.

Policy LP35 (E) requires 90% of new housing to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% to meet Building Regulation Requirement M4(3) 'wheelchair user dwellings'. An application would need to clarify which standards will be achieved (and specific units identified) for this to be secured by condition.

Neighbour amenity

As previously advised, any proposal for new buildings of the scale envisaged in this location would be required to demonstrate that the proposed built form and orientation of the dwellings would not cause a significant loss of sunlight/daylight to the windows of

neighbouring properties, outlook from existing rooms or sunlight to amenity areas. In this respect, an assessment should be undertaken prior to formal submission to confirm that daylight and sunlight availability to neighbouring residential properties would satisfy BRE (British Research Establishment) recommended values and occupiers would not be unduly harmed. The outcome of the assessment may necessitate amendments to the scheme.

It had also previously been noted that the proposed scheme would dramatically alter the outlook for several of the flats within Robins Court and could appear as very overbearing and enclosing when viewed from the rear of adjacent residential properties of in particular at 88-126 Robins Court. For example, the rear of flats within the 3-storey block at 98-112 Robins Hill, located further down the natural slope would be approximately 10 metres from the development.

Before undertaking any further assessment on daylight/sunlight, you are strongly advised to ascertain the rooms to which each of the rear facing windows (that faces towards the proposed development) on Robins Court serves. The key concerns will be those windows serving habitable rooms, in particular those at no. 88-112 Robins Court, given the minimal separation distance to the proposed scheme.

Additional sections including the BRE 25 degree angle were submitted during this submission to address the concerns raised by Wendy during the meeting. Whilst these sections are useful to enable Officers to better understand the site levels, however it is unclear whether the angle is taken from the centre point of the lowest windows along the rear elevation of Robin Court. Further clarification should be submitted at formal application stage. In any case, the section demonstrates the concerns raised by Wendy in that a full storey exceeds the maximum obstruction angle and would therefore need to be omitted in any future scheme to ensure the residential amenity of these occupants are safeguarded. However, the overall height of the scheme may need to be further adjusted when the centre points of the lowest windows on Robin Court are established.

Notwithstanding the above, the distance between habitable rooms must have at least 20m separation distance and the distance between habitable room to side facing window or flank wall must be at least 13.5m. Whilst appropriate privacy screening/obscure glazing may mitigate against any undue loss of privacy/overlooking, these may create design concerns as such a careful balance will need to be made between finding an appropriate layout and design for this constrained site.

Depending on the separation distances, the balconies facing Robin Court may need to be redesigned to prevent loss of privacy and overlooking as well as perceived loss of privacy to the existing occupants.

Whilst it is appreciated there are a number of trees sited between the site and Robin Court, however given these do not offer a degree of permanence, they should therefore not be considered as a baseline situation to justify higher density development or balconies in this location.

There are design concerns to the extensive roof terraces being proposed, these are also considered to result in overlooking/loss of privacy and/or perceived overlooking/loss of privacy as such this design feature should be omitted in any future schemes.

The above highlights the general concerns raised by officers based on the limited information submitted as part of this pre-application submission.

Transport implications

Our previous advice to you remains relevant. The site is located immediately west of the B321 Richmond Hill, within controlled parking zone A1 – Richmond Town operating Monday to Saturday from 8.30am to 6.30pm. Details of this CPZ can be seen at:

https://www.richmond.gov.uk/media/8350/doc-parking_zone_a1_a2.pdf

Vehicular Parking

Local Plan Policy LP45, Para. 1 states that:

The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment and ensuring making the best use of land. It will achieve this by:

- 1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.*

The site has a PTAL score of 1b. Appendix 3 of the Local Plan states that the maximum standard of off-street parking that would need to be provided at this site would be 1 space per dwelling, a total of 30 spaces required however only 11 spaces have been proposed.

Para. 11.2.3 of the Local Plan states that:

Developers may only provide fewer parking spaces, including car free schemes, if they can demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment that there would be no unacceptable adverse impact on on-street parking availability, amenity, street scene, road safety or emergency access in the surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the vicinity. In general, it is expected that in PTAL areas of 0-3 the standards should be met.

The site is within Census Mid-Level Super Output Area Richmond 008. In this area, households living in flats tend to have use of 0.66 vehicles per dwelling. Were this guidance to be followed, the scheme would still need to provide 20 spaces as such there is currently a parking shortfall. You are advised to submit further technical information which justifies the level of off-street parking proposed and this may include car ownership information from similar sites that you already manage.

Irrespective of the above, future schemes will be expected to enter into a legal agreement to exclude residents/staff of the proposed development from obtaining vehicular parking permits within any CPZ as well as season tickets to Council run car parks. Policy compliant provision should be made for disabled parking and electric vehicles, currently 20% active provision and 20% passive provision.

Transport Statement and Travel Plan Statement

A transport statement and travel plan statement will need to be submitted with any formal submission in accordance with Policy LP44 and the Local Validation Checklist.

Please also see the Government Guidance on Transport Assessment (Department for Transport, 2007) accessed at: <https://www.gov.uk/government/publications/guidance-on-transport-assessment> and the National Planning Policy Framework (2018), which can be accessed at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Trip Generation

The site has a public transport accessibility level of 1b, details of which can be seen at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-weecat/webcat?Input=TW10+6RT&PlaceHolderText=eg.+NW1+6XE+or+530273%2C+179613&type=Ptal&zoomLevel=15>. The proposed development is presented as affordable housing for those aged over 55 therefore a TRICS trip generation analysis should be undertaken which bears this in mind. Details can be seen at: <http://www.trics.org/Login.aspx>

Servicing and Refuse Collection

The applicant proposes a refuse and recycling storage area which is located on the western side of the proposed car park. Future scheme will need to demonstrate that the criteria set out in the Refuse and Recycling Storage and Collection Supplementary Planning Document can be met. The SPD can be accessed at:

https://www.richmond.gov.uk/media/7627/refuse_and_recycling_storage_requirements_spd.pdf

Because of the distance between the store and the highway boundary, refuse and recycling vehicles will need to get within 15m of the store to collect refuse and recycling. The applicant needs to provide a vehicular tracking drawing which shows that it is possible for a refuse vehicle of 10.4m in length to do this. A to-scale drawing will need to be submitted at formal application stage.

If there are restriction for refuse vehicles to access into the undercroft parking area, you could explore relocating the refuse store or access to the refuse store closer to the car park entrance to avoid the need for the refuse truck to enter into the car park.

Cycle Parking

The applicant will need to provide secure, sheltered, cycle parking for the new dwellings in accordance with Local Plan Policy LP45 and Appendix 3 of the Local Plan (1 space per 1-bed unit, 2 spaces per 2+ bed units). They should follow guidance set out in the London Cycle Design Standards, which can be seen at: <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>

Given nature of the occupants, there may be scope for a lower cycle parking provision however this will need to be justified. You may wish to consider submitting details of cycle usage in other similar schemes to justify a lower provision on site.

Travel Plan

As stated above, all car-free development proposals need to be submitted with a travel plan. Please see guidance in the link below for what this entails: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>

Construction Management Plan

A construction management plan will need to be submitted as part of formal application which has the following information:

- Details of the construction phasing and duration
- Details of the construction vehicles that will need to access the site
- Vehicle tracking drawings showing that vehicles can enter and exit the site in forward gear safely
- Details of where materials will be stored
- An estimate of the number of construction vehicle trips per day
- Details of any temporary traffic orders, suspensions, or highway licences that will be required to facilitate construction.
- Details of wheel-washing facilities for construction vehicles to ensure debris does not get on the highway.

Trees and woodland

Council's Tree Officer notes the proposal is adjacent to the Nightingale Lane, Terrace Field Gardens and Walk open space which is maintained by the Council. Trees T5 - T19 along the Eastern boundary are sited within this open space and it appears the development reduces the clearance from the proposed buildings compared to the existing ones.

A full series of arboricultural reports in line with BS5837:2012 'Trees in relation to design, demolition and construction - recommendations' will be required when considering the proposal. This will define the minimum distance between construction and retained trees which the Council may increase where appropriate to account for site specific circumstances and to eliminate post development pressure on affected trees. It should be noted that any proposal that would either despoil or be deleterious to these trees would likely be resisted.

Whilst it is noted that you wish to obtain more detailed advice under this pre-application however, in the absence of the necessary arboricultural reports, Officers are unable to provide further comments as such reports are likely to inform the design and siting of any future building on this site, which may result in further adjustments to a subsequent scheme.

As you are aware any formal application submitted shall need to clearly demonstrate that the development can co-exist with the surrounding trees without the potential pressure to significantly lop or fell these where outlook (bearing in mind that the design seeks to maximise views of the River Thames and Richmond Park) and access to light for future

occupants may be prejudiced. The trees officer has updated their advice as follows *“All category of trees should be included within the information not just A and B category as per the impact assessment provided within pre-application document.”*

As previously advised a suitably qualified and experienced Arboriculturalist would need to be commissioned to establish tree related constraints and therefore assist with the overall design and any future application includes the submission of an Arboricultural Report, including the following:

1. A Tree Survey to include all trees present on or adjacent to a development site as specified in section 4.4, BS5837:2012 'Trees in relation to design, demolition and construction - recommendations (2012). The tree survey is to pay specific attention to the Root Protection Area (RPA) of each tree in relation to the proposed development (for the avoidance of doubt, this must include all trees present on or adjacent to the development site).
2. Any trees identified as either and above or below ground constraint on development in the tree survey, must then inform an Arboricultural Impact Assessment (AIA) that evaluates the direct and indirect effects of the proposed design and where necessary recommends mitigation or where redesign and/or repositioning of the proposed development is needed.
3. Based on the findings of the AIA, a scheme for the protection of the retained trees during the preparation, demolition, construction and completion phases of the proposal, in accordance with and addressing sections 5.5, 6.1, 6.2, 6.3 and 7 of BS 5837:2012, including a Tree Protection Plan(s) (TPP) and an Arboricultural Method Statement (AMS) shall also be submitted.

Informative: The following British Standards should be referred to:

BS:3998 (2010) Tree work - Recommendations

BS:5837 (2012) Trees in relation to demolition, design and construction - Recommendations

NHBC Chapter 4.2 (2018): Building near trees

Given the changes to the site it is important to provide ecological, environmental and bio-diversity benefits and to maximise the quality and usability of open spaces and green infrastructure within the development. As stated in the LBRuT Local Plan LP15 and LP16;

"Landscape design must form an integral part of any proposal and needs to be considered in relation to the development, as a whole, at the start of a project. Landscape design and where appropriate tree planting as well as other green infrastructure elements such as green roofs and green walls, will also need to contribute to and complement the existing character of an area."

In reference to the above and in order to safeguard and enhance the character and amenity of the area. We would require a "Hard and Soft Landscaping Plan" to be submitted in accordance with the requirements of the local plan.

Ecology/biodiversity

Our advice remains unchanged in this regard. The Council's ecologist has no in principle objections, but has reiterated that it is essential the amount of green landscaping and as many of the existing trees remain so there is no disturbance to the buffer between Terrace Gardens and the urban setting river side of the river.

As part of any application, you would be required to provide a Preliminary Ecological Appraisal with additional badger (badgers are in the area) and bat surveys (bats are in the area including the possibility of roosts). It would be beneficial to include ecological enhancements (for invertebrates, bats, birds, badgers if applicable, with a potential for a green wall depending upon the difference between existing and proposed green open space) which includes a plan, specifications and maintenance.

In addition, the proposal should be accompanied by landscaping plans, specifications and maintenance and a lighting plan, including a lux contour plan and specifications. There should be no portable light sources for external seating/garden areas.

Some concern has been expressed regarding light spill with mitigation required such as tinted glass facing Terrace Gardens to prevent additional such light spill onto the gardens and also allow continued commuting bat corridors for a 10 m corridor. Full details of the green roofs with brown features would be required and this should be focused on providing a wildflower species mix, as opposed to a sedum mix, which would be more complimentary to the existing landscape.

You are also advised to include good practice for wildlife within the CMS to be submitted as part of the formal application.

Sustainability

The proposal, as submitted, will need to be accompanied by an energy report demonstrating the scheme achieves zero carbon standards in line with London Plan (2016) policy 5.2 and draft London Plan Policy SI2. This means that at least 35% of regulated CO2 emission reductions (against a Building Regulations Part L (2013) baseline) must be achieved on-site, with the remaining emissions, up to 100%, to be offset through a contribution to the Council's Carbon Offset Fund.

The price for offsetting carbon is regularly reviewed and changes to the GLA's suggested carbon offset price will be updated in future guidance. A nationally recognised non-traded price of £95/tonne has been tested as part of the viability assessment for the London Plan, which this borough will use to collect offset payments. More information can be found via link below:

https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance/sustainable_construction_checklist

The following will be required to be submitted as part of any future applications:

- A completed Sustainable Construction Checklist
(http://www.richmond.gov.uk/sustainable_construction_checklist)

- Energy Report demonstrating that the scheme achieves zero carbon standards. (Please note the Council is likely to require an independent review of this report at the cost of the applicant)

The Council may require the Energy Report to be independently reviewed, at cost to the applicant.

Water Efficiency

The Council has adopted the national Building Regulations 'higher standard' for water consumption of 110 litres per person per day (including an allowance of five litres or less per person per day for external water consumption). All new residential developments including conversions, reversions, change of use and extensions that create one or more new dwellings must meet this target.

A National Water Standards Statement: demonstrating water consumption of 110 litres per person per day (including an allowance of 5 litres or less per person per day for external water consumption) will need to be submitted as part of any future application.

Surface Water Drainage Strategy

The Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals.

The proposed development will result in a change of the gross floor area of the site. Therefore, surface water run-off volumes and rates will change. The applicant must submit a surface water drainage strategy prioritising sustainable urban drainage systems and complies with guidance set out in the document in the link below: https://www.richmond.gov.uk/services/planning/sustainable_drainage_systems in accordance with the National Planning Policy Framework. The strategy must show that any increase in surface water run-off can be accommodated on site and that there will be no additional private surface water drainage into the highway.

It is recommended that an extensive green roof is explored to alleviate surface water runoff volume and rates and to ensure compliance with LP 21 of the Local Plan. In addition, the following will be required to be submitted:

- London Sustainable Drainage Proforma
Link below: https://www.richmond.gov.uk/services/planning/sustainable_drainage_systems
- Statement on Sustainable Drainage Systems
This to include the proposed Sustainable Drainage System to be incorporated in the development, along with details for their long term management and maintenance.
- Foul sewage and utilities statement

Which should be accompanied by a letter of confirmation from the appropriate water utility company that sufficient capacity exists in the public sewerage and water supply network to serve the development or can be provided before construction is complete.

You can contact Thames Water's free pre planning service: <https://www.thameswater.co.uk/preplanning>

Archaeology

Excavation is proposed. Therefore, the application would be expected to be supported with an Archaeological assessment as the site is within an Archaeological Priority Area.

Flooding

Given its elevated position the site is not within an identified area of high flood risk. However, details of SuDs would be required to be submitted with any formal application as the size and scale of development could have an impact on the local surface and foul water drainage infrastructure. It will also need to be demonstrated that any future development would not result in flooding elsewhere in the drainage system.

Air Quality

LP10 and the Council's recently adopted Air Quality SPD apply to all major development schemes and at the minimum an air quality and dust risk assessment will be required for construction impacts and an Air Quality Neutral assessment. See para 127 onwards and para 132 of the [SPD](#) for validation requirements and note this should feed into the Health Impact Assessment process. The Air Quality SPD and [Planning Obligations SPD](#) sets out that a financial contribution will be required to contribute to off-site measures where it is not possible to fully mitigate the air quality impacts on-site.

Community Infrastructure Levy

Your attention is again drawn to the CIL Regulations and while some elements of the proposal may be exempt from CIL this is required to be clearly set out in the submission.

Community Engagement

Given the sensitive nature of the proposed development, early community engagement is very strongly recommended. For major schemes, a community engagement report will need to be submitted at formal application stage.

In view of existing situation restricting social contacts, you are advised to explore alternative methods of engaging with local community via websites. You could still send letters to community groups, Councillors, residents, etc and prepare a website setting out your proposal and allow for questions/comments to be submitted.

Planning Performance Agreement

Given the scale and complexity of the proposed development, should a future scheme materialise we would advise you to consider entering into a Planning Performance Agreement to engage Officers in further meetings and planning guidance at both pre-application and pre-determination stages.

Summary

Given the existing use and sensitivity surrounding this site and the requirement to provide some enabling development, a careful balance is required in assessing the impact, particularly around the design and massing of the scheme.

Whilst the more organic design approach is considered an improvement from earlier scheme, Officers remain concerned that the overall bulk, height and scale would not be appropriate in this setting and such harm may not necessarily be outweighed by securing the long term future of the existing housing.

Overall, a careful balance is going to have to be made between finding an appropriate layout and density for the site, the relationship and separation between neighbouring buildings, the provision of sufficient landscaping, planting and residential amenity space and parking and servicing of the site in order to accord with the Council's development plan.

Submission Documents

As well as those documents listed above in this letter, you are advised to review the Local Validation Checklist to ascertain the drawings/reports/documents associated with a major/minor development will need to be submitted with any future application. Further information can be found via link below:

https://www.richmond.gov.uk/media/18491/local_validation_checklist_for_all_applications.pdf

Without prejudice

Any advice given by Council officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to future planning consents. Any views or opinions expressed are given in good faith and to the best of ability without prejudice to formal consideration of any planning application, which was subject to public consultation and ultimately decided by the Council. You should therefore be aware that officers cannot give guarantees about the final form or decision that will be made on your planning or related applications.

Although the advice note will be brought to the attention of the Planning Committee or an officer acting under delegated powers, it cannot be guaranteed that it will be followed in the determination of future related planning applications and in any event circumstances may change or come to light that could alter the position. It should be noted that if there has been a material change in circumstances or new information has come to light after the date of the advice being issued then less weight may be given to the content of the Council's pre-application advice of schemes.

(You are also advised to refer to local and national validation checklist on the Council's website)

Yours sincerely



Ms Nicki Dale
Team Leader – South Area Team
Development Management

Appendix 3: Gazetteer of Heritage Data

Heritage Data

HER Event Data

EvUID	Record Type	Name
ELO3025	EVT	Cambridge Road, Richmond: Evaluation
ELO4679	EVT	Twickenham Bus Garage
ELO1193	BL	The River Thames Greater London: Survey
ELO11606	BL	Cambridge Park [The Old Garden], London, TW1 2JP: Watching Brief
ELO11614	EVP	Petersham Road, rICHMOND, SW14: Desk Based Assessment
ELO11953	BL	Petersham Road, (Terrace Yard), Richmond-upon-Thames. Archaeological Watching Brief.
ELO14214	BL	Richmond Hill (No 7), Richmond: Watching Brief
ELO3903	BL	Lancaster Mews Richmond Hill London Borough of Richmond Upon Thames: Evaluation
ELO5552	BL	Wakefield Road London Borough of Richmond Upon Thames: Desk based assessment
ELO19269	BL	Paradise Road [St Mary Magdalene Church] London Borough of Richmond Upon Thames: Watching Brief
ELO10491	BL	Cambridge Road [Twickenham Bus Garage] Twickenham London Borough of Richmond Upon Thames: Desk based assessment
ELO19710	BL	Ormond Road [Dolphin House] London Borough of Richmond Upon Thames: Watching Brief
ELO10500	BL	George Street (Nos 29-34) London Borough of Richmond-upon-Thames: Evaluation
ELO2988	EVT	Cambridge Park (No 27) Twickenham Greater London: Evaluation

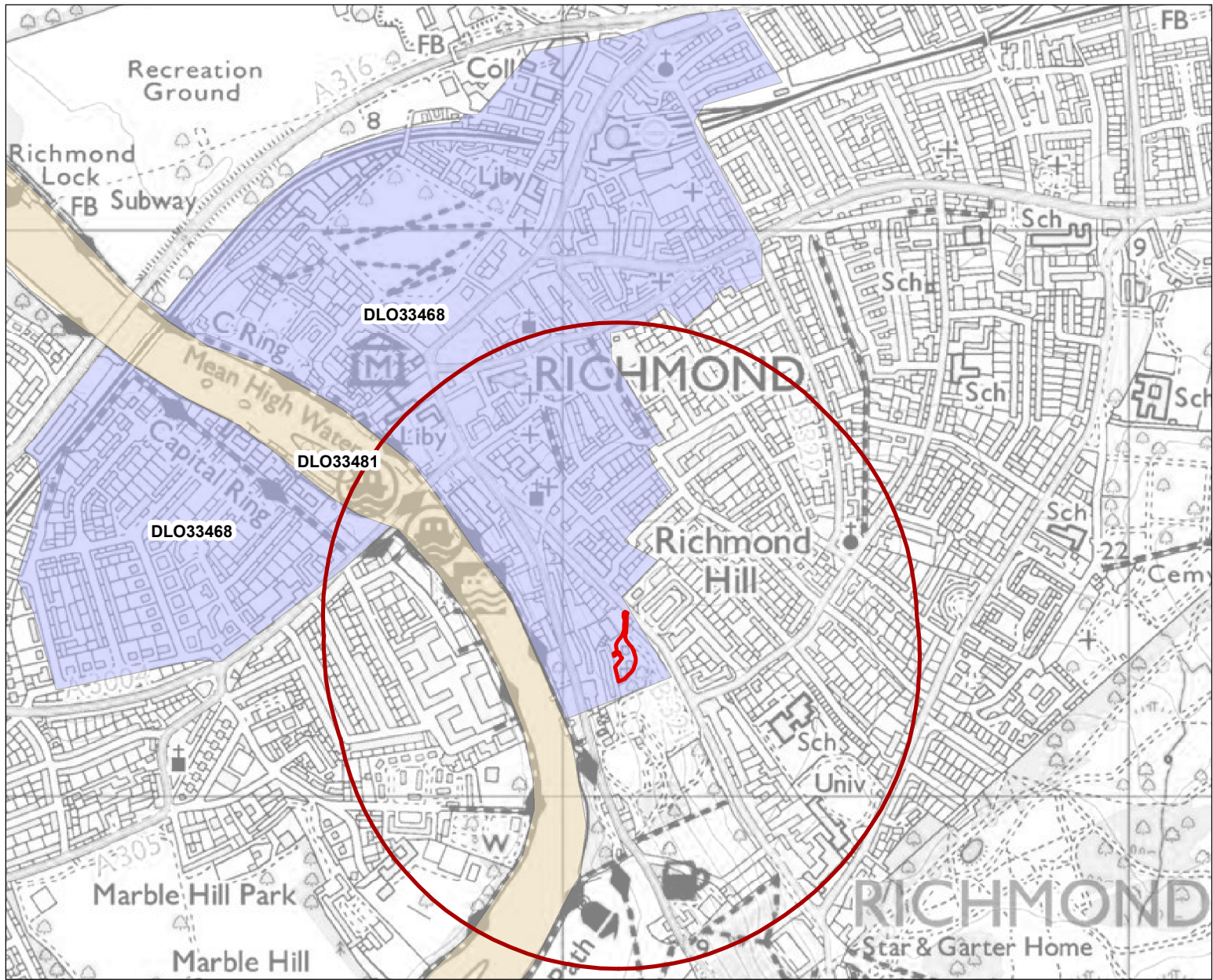
HER Monument Data

MonUID	PrefRef	Record Type	Name	MonType	PeriodRang
MLO13531	020867/00/00	FS	RICHMOND HILL	FINDSPOT	Palaeolithic
MLO18105	201410/00/00	MON	BUCCLEUCH GDNS	HOUSE	Post Medieval
MLO18930	020945/00/00	FS	Richmond {Neolithic flint arrowhead}	FINDSPOT	Neolithic
MLO18931	020946/00/00	FS	Richmond {Neolithic flint axe and adze}	FINDSPOT; FINDSPOT	Neolithic

MLO18932	020947/00/00	FS	Richmond {Palaeolithic flint scraper}	FINDSPOT	Palaeolithic
MLO18933	020948/00/00	FS	Richmond {Neolithic flint axe}	FINDSPOT	Neolithic
MLO18934	020950/00/00	FS	Richmond {Neolithic lithic implements}	FINDSPOT	Neolithic
MLO18975	021016/00/00	FS	RICHMOND HILL	FINDSPOT	Bronze Age
MLO18987	021030/00/00	FS	RIVER THAMESSURREY BANK	FINDSPOT	Bronze Age
MLO18999	020922/00/00	MON	HERON COURT	WATERCOURSE	Unknown
MLO19087	020949/00/00	FS	Richmond {Palaeolithic flake}	FINDSPOT	Palaeolithic
MLO22914	100251/00/00	FS	RICHMOND BRIDGE	FINDSPOT	Roman
MLO23451	020965/00/00	FS	BUCCLEUCH HOUSE (NEAR)	FINDSPOT	Neolithic
MLO3119	100249/00/00	FS	RICHMOND BRIDGE	FINDSPOT	Neolithic
MLO3120	100250/00/00	FS	River Thames, [near Richmond Bridge] {Bronze Age bronze dagger}	FINDSPOT	Bronze Age
MLO48459	020922/01/00	FS	HERON COURT	FINDSPOT; FINDSPOT	Medieval to Post Medieval
MLO48460	020922/02/00	FS	HERON COURT	FINDSPOT	Prehistoric
MLO48461	020922/03/00	FS	HERON COURT	FINDSPOT	Iron Age
MLO58660	021401/00/00	MON	RICHMOND ICE RINK CAR PARK	PARK; CULTIVATION SOIL	Post Medieval
MLO63897	021926/00/00	FS	LANCASTER MEWS	FINDSPOT	Prehistoric
MLO63898	021927/00/00	FS	LANCASTER MEWS	FINDSPOT	Medieval
MLO63923	021928/00/00	MON	CAMBRIDGE RD	UNASSIGNED	Post Medieval
MLO69196	022370/00/00	FS	RICHMOND BRIDGE	FINDSPOT; FINDSPOT	Prehistoric
MLO69662	022406/00/00	MON	THAMES FORESHORE	STEPS	Post Medieval
MLO69663	022407/00/00	MON	THAMES FORESHORE	DRAIN	Post Medieval
MLO69664	022408/00/00	MON	THAMES FORESHORE	STRUCTURE	Post Medieval
MLO69665	022409/00/00	MON	THAMES FORESHORE	RAILINGS	Post Medieval
MLO69669	022410/00/00	MON	THAMES FORESHORE	DRAIN	Post Medieval
MLO69670	022411/00/00	MON	THAMES FORESHORE	STEPS	Post Medieval
MLO69671	022412/00/00	MON	THAMES FORESHORE	UNASSIGNED	Post Medieval
MLO69672	022413/00/00	MON	THAMES FORESHORE	DRAIN	Post Medieval
MLO69673	022414/00/00	MON	THAMES FORESHORE	SLIPWAY	Post Medieval
MLO69686	022427/00/00	MON	THAMES FORESHORE	STRUCTURE	Post Medieval
MLO69687	022428/00/00	MON	THAMES FORESHORE	DEPOSIT UNCLASSIFIED	Prehistoric

MLO69688	022429/00/00	MON	THAMES FORESHORE	MOORING BOLLARD	Unknown
MLO69689	022430/00/00	MON	THAMES FORESHORE	DEPOSIT UNCLASSIFIED	Prehistoric
MLO69690	022431/00/00	MON	THAMES FORESHORE	STRUCTURE	Post Medieval
MLO69694	022435/00/00	MON	THAMES FORESHORE	MOORING BOLLARD	Post Medieval
MLO69695	022436/00/00	MON	THAMES FORESHORE	CAUSEWAY	Unknown
MLO69707	022448/00/00	MON	THAMES FORESHORE	STRUCTURE; TROUGH	Post Medieval
MLO69708	022449/00/00	MON	THAMES FORESHORE	REVETMENT	Post Medieval
MLO69720	022461/00/00	MON	THAMES FORESHORE	SLIPWAY	Post Medieval
MLO69721	022462/00/00	MON	THAMES FORESHORE	STEPS	Post Medieval
MLO69722	022463/00/00	MON	THAMES FORESHORE	SLIPWAY	Post Medieval
MLO72108	023262/00/00	PLA	RICHMOND BRIDGE ST	FERRY CROSSING	Medieval to Post Medieval
MLO9174	020840/00/00	FS	RICHMOND HILL	FINDSPOT	Palaeolithic
MLO101071	MLO101071	PK	Richmond Hill, [Terrace and Buccleuch Gardens], Richmond upon Thames {18th to 19th century gardens now a public walk}	GARDEN; PUBLIC PARK	Post Medieval to Modern
MLO101073	MLO101073	PK	Richmond Hill/Nightingale Lane, [Richmond Terrace Walk], Richmond {18th century walk}	TERRACED WALK	Post Medieval to Modern
MLO103228	MLO103228	PK	Petersham Road [Petersham Meadows] Richmond TW10 {public open space by the Thames}	PUBLIC PARK	Modern
MLO103983	MLO103983	MON	Paradise Road [Vineyard Passage Burial Ground], Richmond, TW10 6PB {18th century burial ground}	CEMETERY	Post Medieval to Modern
MLO20017	MLO20017	MON	Star and Garter Hill [Petersham Common], Petersham, Richmond {Medieval lynchets}	STRIP LYNCHET	Medieval
MLO73983	025504/00/000	LLB	Whittaker Avenue, [Old Town Hall], {Former Richmond Town Hall}	TOWN HALL	Post Medieval

Appendix 4: Figures



KEY

- Site
- Study Area
- Richmond
- Thames Foreshore and Bank

Revisions:
First Issue- 19/08/2021

Figure 1: Archaeological Priority Areas

Howson Terrace, Richmond Hill, Richmond, London

Client: Housing21
 DRWG No: P17-2640 Sheet No: - REV:-
 Drawn by: RG Approved by: GST
 Date: 19/08/2021
 Scale: 1:10,500 @ A3

0 0.45 km





KEY

- Site
- Study Area
- Event Point
- Event Polygon

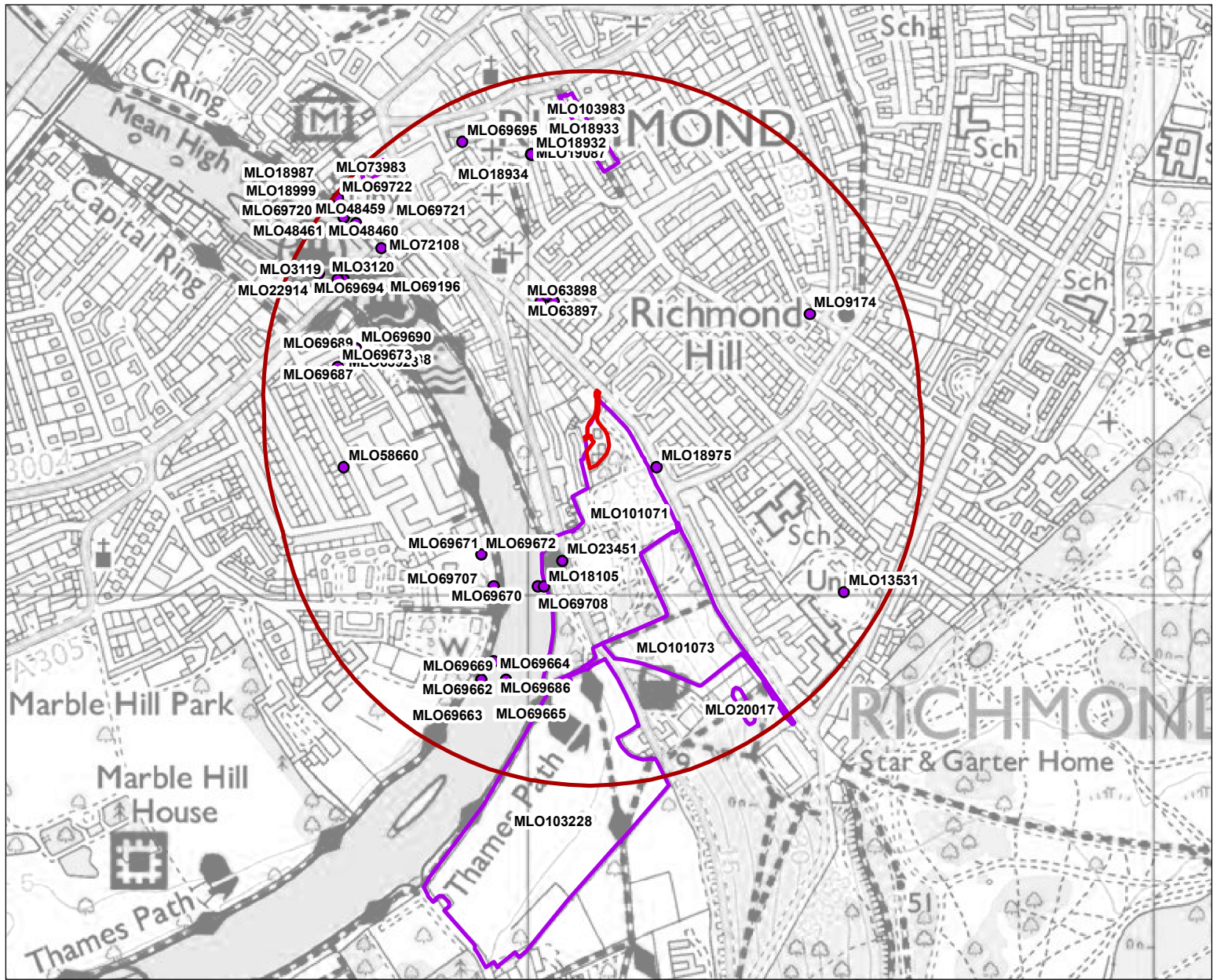
Revisions:
First Issue- 19/08/2021

**Figure 2: Greater London
HER Event Data**

Howson Terrace, Richmond
Hill, Richmond, London

Client: Housing21
 DRWG No: P17-2640 Sheet No: - REV:-
 Drawn by: RG Approved by: GST
 Date: 19/08/2021
 Scale: 1:8,000 @ A3





KEY

- Site
- Study Area
- Monument Point
- Monument Polygon

Revisions:
First Issue- 19/08/2021

**Figure 3: Greater London
HER Monument Data**

Howson Terrace, Richmond
Hill, Richmond, London

Client: Housing21
 DRWG No: P17-2640 Sheet No: - REV:-
 Drawn by: RG Approved by: GST
 Date: 19/08/2021
 Scale: 1:9,500 @ A3

Appendix 5: Grade II Registered Terrace and Buccleuch Gardens Entry

TERRACE AND BUCCLEUCH GARDENS

Overview

Heritage Category:
Park and Garden

Grade:
II

List Entry Number:
1001551

Date first listed:
24-Aug-2001

Map



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The above map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF -

[1001551.pdf](https://mapservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/1587/HLE_A4L_Grade|HLE_A3L_Grade.pdf)
(https://mapservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/1587/HLE_A4L_Grade|HLE_A3L_Grade.pdf)

The PDF will be generated from our live systems and may take a few minutes to download depending on how busy our servers are. We apologise for this delay.

This copy shows the entry on 27-Aug-2021 at 16:04:13.

Location

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Richmond upon Thames (London Borough)

Parish:

Non Civil Parish

National Park:

N/A

National Grid Reference:

TQ 18063 73945, TQ 18144 74108

Details

Terrace Gardens and Buccleuch Gardens (collectively known as Terrace and Buccleuch Gardens) is a public park and made up of the grounds of three C18 and C19 estates. The grounds of Buccleuch House and Lansdowne House were initially consolidated by the Duke of Buccleuch in the 1860s and became a public park in 1887. The grounds of neighbouring Cardigan House were added in the 1920s. None of these houses is still standing but the C19 layout of their gardens is still very much in evidence.

HISTORIC DEVELOPMENT

During the medieval period the area of what is now the Terrace and Buccleuch Gardens was common land within the Royal manor. It was defined by what was later known as Upper Road (now Richmond Hill) and Lower Road (now Petersham Road). This part of Richmond Hill, which was known as Hill Common, has commanding views over the Thames and as early as the mid C17, a seat was placed on the Richmond Terrace Walk to enjoy the view. The scene is illustrated by both Tillemans and Knyff in the early C18, and the view from the Terrace overlooking the curve of the Thames was also depicted by Joshua Reynolds (1723-1792) and JMW Turner (1775-1851).

From the early C17, brickworks, known as the Tile Kilns, and a wharf, together with workers' houses, occupied parts of the riverside, and clay digging occurred along the lower slopes of Richmond Hill. During the period 1765-1771 parcels of land in this area were acquired for George Brudenell, the Earl of Cardigan and Duke of Montagu. The land purchased consisted of a parcel on the riverside west of the Lower Road (now Buccleuch Gardens) and included the Tile Kilns and the wharf, as well as adjacent plots to the east of Lower Road.

An existing house on the slope of the hill was converted into a summerhouse (since the late C19 the site of the tea house). A new summerhouse, probably on the same site, was designed by the Adam brothers, incorporating antique capitals.

In the mid C18, Montagu House, later known as Buccleuch House, was built on Lower Road and in 1769 the Duke of Montagu was granted ground by the Vestry of Richmond. The area was useless as common pasture because the steep gradient made it too dangerous for grazing cattle. This part of Richmond Hill had by then been seriously undermined by clay extraction and continual landslips were endangering the Upper Road (Richmond Hill) and the adjacent buildings. Little is recorded of the Duke's activities in laying out the gardens, but in 1769, Lady Mary Coke mentioned after a visit, that 'the garden they are making upon the Hill will be very pretty but is extremely expensive, as all the grounds is supported by timber, and two different sorts of soil are brought to lay over the natural one which is clay' (Blest Retreats).

Horace Walpole said of a visit in 1790 that '[the garden] is perfectly screened from human eyes, tho' in the bosom of so populous a village: and you climb til at last, treading the houses under feet, you recover the Thames and all the world at a little distance. I am amazed that it is not more talked of'. In 1796 the house and gardens were described by Daniel Lysons: 'At the foot of the hill the Duke of Buccleuch has a villa ... It is situated on the banks of the Thames. From the lawn there is a subterraneous communication with the gardens and shrubberies on the opposite site of the road, which extends almost to the summit of the hill. They are laid out with taste and have local advantages to most places of the kind in the kingdom'.

Walter Francis Scott (1806-84), the fifth Duke of Buccleuch and seventh Duke of Queensbury, took over Buccleuch House in 1827. He moved the former alehouse of the brick workers, the Three Pigeons Inn, to its current location on the riverside at 87 Petersham Road and undertook some alterations to the office buildings on the east side of Lower Road. Illustrations of 1822 and 1844 show the riverside part of the estate with grass and trees and a more densely wooded area behind. Newspaper articles in 1887 describe the garden to the east of Lower Road as 'magnificently wooded' and 'charming in its leafy retirement' which suggests that the screened character of the estate, first described by Horace Walpole, had survived.

Lansdowne House, set on the slope of Richmond Hill above Buccleuch House, had been owned since the 1770 by Charles William Molyneux, Duke of Molyneux and Earl of Sefton, who was succeeded by George Townshend, Earl of Leicester and second Marquis of Townshend in the 1790s. After Townshend's death in 1811 Lansdowne House was occupied by the Marquis of Wellesley, and in 1830 by Henry Petty, Earl of Lansdowne. In 1863, the fifth Duke of Buccleuch acquired Lansdowne House and estate, which sat to the east of his existing grounds, eventually demolishing the house and incorporating the gardens into his own. The Duke was noted for his lavish fêtes, and entertained many eminent guests including William IV and Queen Adelaide in 1833, Queen Victoria, Prince Albert, King Leopold of Belgium, the Duke of Wellington and Lord Melbourne in 1842 and even the Sultan of Turkey in 1867. When he died in 1884 he was by far the wealthiest man in England. He was succeeded by his eldest son William, who sold the Richmond estate for £30,000 in 1886.

The Vestry of Richmond, concerned that the Buccleuch estate might be developed with housing, which would destroy the view from Terrace Walk (which was subsequently and unusually protected by an Act of Parliament in 1902), bought the properties and immediately sold the buildings, namely the Three Pigeons Inn, Buccleuch House, and the stables. In May 1887, following some repair work, the remaining gardens were opened to the public as the Terrace Gardens. The Duke of Buccleuch had been President of the Royal Horticultural Society from 1861 to 1872 and Richmond Vestry, noting that '[the gardens] had been laid out not many years ago by the Duke of Buccleuch', decided 'to keep the gardens practically as they were - there was no need to gild the lily'.

Following landslides after heavy rains in the 1920s and 1930s, the drainage system on the Hill was modernised and the damaged paths and steps were repaired. In 1937 Richmond Borough Council (the successors to the Vestry) bought back Buccleuch House; this was later demolished and the riverside garden and promenade were opened to the public.

To the north of Terrace Gardens lay the site of the Richmond Wells, a place of entertainment from 1690 to 1750. In 1755, the buildings were demolished and replaced by Cardigan House as a residence for the sixth Earl of Cardigan. When the eighth Earl of Cardigan died in 1837 the estate was sold. Richmond Council purchased the estate in 1926 and extended Terrace Gardens to the north by cutting a doorway through the old boundary wall of the Cardigan House estate. A 'Woodland Garden' was laid out and in the 1960s further ornamental trees and rhododendrons were planted from famous collections at Exbury (qv) and Ascott, Bucks (qv). Cardigan house continued to belong to the British Legion Poppy Factory Ltd, and was used as the Legion's clubhouse until 1970 when the building was demolished and the remaining estate developed as apartments. Outside the Registered area, Bromwich Drive follows the route of the original drive to Cardigan House, now the site of the C20 Bromwich House residential block.

Terrace and Buccleuch Gardens remains (2010) a public open space managed by the London Borough of Richmond-upon-Thames, in conjunction with Richmond Terrace Walk (qv), including Terrace Field.

DESCRIPTION

LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING

Terrace and Buccleuch Gardens are situated on the east bank of the River Thames, c 700m upstream from Richmond Bridge. The c 5ha site is divided by Petersham Road into two parts: Buccleuch Gardens, the triangular riverside plain west of the public road; and the hillside east of it, known as the Terrace Gardens, which occupy an irregular, elongated site running approximately north-south, rising steeply from the river.

Buccleuch Gardens is bounded to the north by the former Three Pigeons Inn, (87 Petersham Road) to the west by the banks of the River Thames, to the south by an iron fence on a bank dividing the land from Petersham Meadow, and to the east by a brick wall alongside Petersham Road.

Terrace Gardens are bounded to the west by a wall surmounted by railings alongside Petersham Road and by Langham Lodge (144-146 Petersham Road), and to the south and east by Terrace Field. The northern boundary is composed of plain spiked C20 iron railings backed up by shrubs. To the east, the boundary of the Gardens is defined by the brick retaining wall which separates the Gardens from the pavement on Richmond Hill. The wall between Cardigan Gate and Friars Stile Gate is C20; the stretch to the south of this to the boundary with Terrace Walk (qv) is comprised of C18 and C19 walls which formed part of the boundaries of Lansdowne House and its estate.

The tree-lined Richmond Terrace Walk (qv), which lies outside this registered landscape, runs from the south-east corner of this site, extending south-east along the ridge of Richmond Hill. The Terrace Walk, although laid out in the C17, did not form part of the design of the estate gardens which comprise Terrace and Buccleuch Gardens and is managed as a separate entity by Richmond Borough Council.

Some sections of the C19 brick walls which divided the former private estates remain: one on the east part of the boundary with Terrace Field, a second on the former boundary of Lansdowne House with Cardigan House.

The setting to the north, west, and east is composed of suburban areas of Richmond and Twickenham, and in particular, distinguished C18 and early C19 houses overlooking Richmond Hill and approaching Richmond Park (Grade I). Terrace Gardens lie alongside, and frame the view from Richmond Hill, designated as Richmond Terrace Walk, (Grade II*) which is, significantly, protected by Act of Parliament (1902), which was an important landmark in the history of the conservation of landscapes and of the amenity movement. To the south the open spaces of Terrace Field, Petersham Meadows and Ham Common lead to Ham House (qv); to the south-west, across the River Thames lie Marble Hill (qv), Orleans House gardens, and York House (qv), and to the south-east, beyond Petersham Common, lies Richmond Park (qv). The history and context of Terrace and Buccleugh Gardens add to its group value as one of the interlocking landscapes flanking the River Thames between Kew and Hampton Court.

ENTRANCES AND APPROACHES

Terrace Gardens is approached from the east off Richmond Hill through four gates through the boundary wall leading into the terrace at the summit of the gardens. From north to south, these have been named by Richmond Borough Council as follows: Cardigan Gate - the C20 entrance at the north-east corner of the park on Richmond Hill; Friars Stile Gate; Lansdowne Gate - a flight of steps opposite the end of Friars Stile Road in the position of the historic entrance to Lansdowne House; Terrace Gate - a flight of steps adjacent to the Park Keeper's Hut (qv) leading up to Richmond Terrace Walk (qv).

Continuing clockwise around the perimeter of the Gardens, three further gates lead on to Terrace Field at the south, one in the centre of the south-east boundary (late C19 iron gate within an arch in the brick wall), called Field Gate. Grove Gate, a new gate (2009) through fencing which cuts through the former grounds of Buccleuch House along the top of a steep east-west scarp in the grounds. This gate and fence do not define the boundaries of the registered landscape, which includes the former wilderness garden to the south. The south-west corner of Terrace Gardens (where the wilderness garden is located) is reached from the entrance onto Terrace Field (qv) from Petersham Road. At the north-west corner of the gardens is a late C18 or early C19 pair of brick gate piers with ball finials, called Three Pigeons Gate, which leads onto Petersham Road opposite the former Three Pigeons Inn.

Buccleuch Gardens and Terrace Gardens are connected by a flint-lined, barrel-vaulted tunnel under Petersham Road (qv) (probably C18, remodelled

C19, listed Grade II), now known as Grotto Gate. Approaching from the Terrace side, there are two symmetrical, semi-circular flights of steps leading down to the mouth of the tunnel. These are framed by C20 steel or wrought iron gates and fencing. On the Buccleuch Gardens side, the tunnel opens out to three bays with rusticated arches, which are lined with coloured stones (flint and slag). Set into the back wall of the two external arches are two pieces of antiquarian sculpture. The keystones in the arches appear to be reused gargoyles (scuppers), perhaps reused from earlier structures on the site.

A private, gated tunnel under the Petersham Road connects Langham Lodge to Buccleuch Gardens remains from when Langham Lodge and Buccleuch House were one property, separated by the road.

Buccleuch Gardens are approached from the north and south by the Thames Path. Access from Petersham Road has been opened up at the north-east corner of the Gardens, next to the former Three Pigeons Inn, on the site of a former slipway to the Thames. There are two further entrances onto Petersham Road at the south-east corner of the Gardens.

GARDENS AND PLEASURE GROUNDS

The C19 path system in Terrace Gardens still reflects the historic garden layout and the boundaries of the three estates which make up the site. The slopes of Terrace Gardens are provided with a network of sinuous paths that run approximately parallel to the contours of the hillside, connected by stairways. According to historic maps, the layout of the paths is largely unchanged since at least the early C19, parts of Buccleuch House estate may be earlier. Low brick retaining walls (late C19 to early C20) line the uphill sides of the paths. The paths themselves, which have been refurbished, 2009-10, are covered with asphalt, gravel or concrete with some crazy-paving. Mature trees survive across the park, while specimen trees were also planted during the later C19 and C20. The steep slopes and the perimeter of Terrace Gardens are densely planted with trees and shrubs, lending the gardens a secluded character, and the lawns are planted with scattered mature trees and beds.

Cardigan House Grounds: In the former grounds of Cardigan House, now the northernmost part of Terrace Gardens, stands a C19 brick-built icehouse, cut into the hillside and redesigned in the later C19 as an ornamental garden feature, decorated with seashells and what appears to be slag. This structure may predate Cardigan House and date from the period of Richmond Wells (1696-1763), but it is not possible to say with certainty as it has been so altered.

A rebuilt C21 wooden shelter with a wood-tiled roof is situated to the west of the eastern perimeter path on the former boundary between Cardigan House and Lansdowne House. Located on the site of previous rustic, thatched garden shelters, it looks out over internal vistas of the park, looking south. A rock garden laid out in 1928 surrounds the shelter. It overlooks a small rosary, set on gently falling ground. At the upper end of the rosary stands a much-restored sundial, a remnant of the old Buccleuch estate garden ornaments. In the centre of the rosary stands a stone well-head found in the grounds, now used as a planter.

A few metres to the south of the icehouse is a carved Fishmarker Stone set on a stone plinth. Moved here from its original location on the river, this stone was historically used as a fare stage for navigators on the Thames informing them of the distance to Westminster Bridge from Richmond (14³/₄ miles).

Lansdowne House Grounds: A late C19 terrace, reworked in the early to mid-C20 and recently restored, and laid out on the site of the former Lansdowne House, overlooks the gardens at the head of the site. On the upper platform of this terrace is a round pond with a Portland stone statue of Aphrodite (also known locally as 'Bulbous Betty'). This statue, carved and presented to Richmond Council by A Howes in 1952, replaced a late C19 cast-iron fountain. To the east, this upper terrace is bounded by an early C19 brick wall with a five-bay arcade. A drinking fountain of 1887 is set into the middle bay. The terrace and walk above it are enclosed by brick balustrades with reconstituted stone rails. On either side of this terrace are sloping paths leading up to the upper walkway, which is backed by a brick retaining wall of C18 and C19 date. This in turn leads to the northern end of Terrace Walk, reached by stone steps, adjacent to which is a small green-painted kiosk known as the Park Keeper's Hut (c 1900, listed Grade II). A disused two-storey brick toilet block (c 1930) is situated at the south-east corner of Terrace Gardens.

Buccleuch House Grounds: Historically, the grounds of Buccleuch house gardens extended on both sides of Petersham Road.

On the eastern side of Petersham Road, behind Langham Lodge and the former stables and service yard to Buccleuch House, is 'the wilderness' garden - a series of sinuous paths and steps, lined in brick and stone, some possibly fabricated stone, and running through a densely shrubbed and wooded area down the slope from the southernmost end of the Terrace Gardens. The plan of these paths, which survives today, can be clearly seen on maps of the Buccleuch estate from at least 1868 and may predate this, and relate to Montagu House.

A thatched tea house is situated in the centre of Terrace Gardens on the site of the Duke of Montagu's summerhouse. The existing building which dates to the late C19, gives onto a terrace protected by an early-C20 wooden roof. The terrace provides views over the Thames and from here a lawn sweeps down the slope to Grotto Gate and the perimeter path of the gardens. Set on the slope to the west of the tea house and surrounded by a protective hedge stands a Coade stone figure of Father Thames (John Bacon 1775, listed Grade II), facing the lawn below. The statue is thought to be a survivor from the statuary of the Montagu pleasure grounds and was moved here from its former location some metres to the south-east after major restoration works in the 1990s.

At the north-west corner of this part of the gardens, not far from Three Pigeons Gate, is a conservatory with a small service yard behind. The present

conservatory replaces a series of C19 and C20 conservatories on the same site and marked on historic maps. In the back wall of the conservatory sits a carved stone relief of Adam and Eve at the Apple tree with the snake. This is said to be a remnant from the Landsdowne estate.

Buccleuch Gardens Grounds: Buccleuch Gardens, on the western side of Petersham Road on the banks of the Thames, consist of a lawn which is bordered to the east by a single path which forms part of the Thames Path. The sudden change of slope running north-south along the riverbank in the Gardens marks the flood line of the Thames. The Gardens feature a number of mature plane trees and are screened from Petersham Road by shrubberies alongside the dividing brick wall. On that boundary, opposite Langham Lodge, is a brick shelter (c 1930s) built on the site of Buccleuch House, which was demolished in the 1930s. To the south, surviving arcades from the house are used for storage and a private tunnel leads under the road to Langham Lodge. At the entrance stands a late C20 drinking fountain. A fenced-off area on the southern boundary divides the Gardens from Petersham Meadow.

The public highway, Petersham Road, is excluded from the registered park and garden.

Views: The views within the Terrace Gardens are many and varied, and several are remarkably similar to those described in 1887. They are predominantly internal views, with the panoramic vistas over the Thames being reserved only for the uppermost parts of the gardens. From the uppermost terrace along the top of Richmond Hill, above the former site of Landsdowne House, there are panoramic views downhill across the curve of the Thames to Marble Hill and Twickenham and Surrey in the distance. Further north along this terrace, near Friar's Stile Gate, there is a view of the River Thames, framed by mature trees. The river can be glimpsed through trees from the terrace above the rock garden, but historically this view was an internal vista, framed by mature vegetation. Further vistas within the grounds can be found from the steps to Grotto Gate looking up through the gardens towards the top of Richmond Hill, from across the lawn looking north towards the Conservatory and from the lawn north of the tea house looking up towards the wooden shelter. In Buccleuch Gardens, there are good vistas both up and down river, framed by specimen trees.

REFERENCES

Daniel Lysons, *Environs of London*, 1796 Thames Valley Times, Terrace Gardens Number, Part 2, 1 June 1887 Richmond and Twickenham Times, 28 March 1959; 12 May 1962 *Blest Retreats*, A history of private gardens in Richmond upon Thames, Richmond upon Thames Library and Information Services, 1984 Terrace Gardens Centenary, Souvenir Brochure, 1987 London Borough of Richmond upon Thames, Terrace Gardens and Buccleuch Gardens Management Plan, 2009-2014 Thames Landscape Strategy www.thames-landscape-strategy.org.uk (accessed 5 Nov 2010)

McEwen, R, *Princes, Prime Ministers and Pre-Raphaelites*, Terrace Gardens and the Duke of Buccleuch (2010)

Maps: John Roque, *Map of Twenty Miles Around London*, surveyed 1741-5, published 1746

OS 6" to 1 mile: 1st edition surveyed 1863-6, published 1869 2nd edition published 1897 1933 edition

Illustrations: L Knyff, *A View from Richmond Terrace*, c1720 Peter Tillemans, *View from Richmond House*, c1730 (private collection) Richmond, From the Duchess of Buccleuch's Garden, Rodwell & Martin, 1822 *The Duke of Buccleuch's Villa*, Richmond, (Engraving for Brayley's *History of Surrey* 1844)

Archival items: Minutes of Council meeting, 12 March 1926, Richmond upon Thames Library and Information Services

REASONS FOR DESIGNATION Terrace and Buccleuch Gardens are designated at Grade II for the following principal reasons: * Historic plan: the late C18 and early C19 design and plan of the gardens, both in separate and then joint ownership is still clearly visible in the layout of the grounds - in particular the path system and location of borders and mature trees. * Planting: the gardens were purposely designed to be secluded and enclosed, a historic characteristic which dates from the C18 and indicated by surviving specimen trees and shrubs; * Historic interest: association with significant historical and political figures of C18 and C19, notably the Duke of Buccleuch; acquisition by Richmond Vestry and context of the Act of Parliament (1902), an important landmark in the history of the conservation of landscapes and of the amenity movement. * Setting: the gardens frame the important historic view from Richmond Hill (Richmond Terrace Walk, registered Grade II*) which was protected by Act of Parliament (1902); views within the gardens and across the grounds, with outward views to the River Thames and Surrey from the top of the Gardens; group value as one of the interlocking landscapes along the River Thames between Kew and Hampton Court.

Description written: March 2000; amended August 2001, SR; Amended Nov 2010, PT Register Inspector: CV Amended: November 2010

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:

4974

Legal

This garden or other land is registered under the Historic Buildings and Ancient Monuments Act 1953 within the Register of Historic Parks and Gardens by Historic England for its special historic interest.

End of official listing

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DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



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