



Heritage Impact Assessment

47a, 47 and 49
Lower Mortlake
Road, Richmond,
TW9 2LW

February 2022 | Project Ref 5312B

HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



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1. Introduction

1.1 This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Westlake Property Limited (the Applicant), in support of a full planning application for the re-development of the Site at 47a, 47 and 49 Lower Mortlake Road, Richmond, TW9 2LW.

1.2 The Proposed Development comprises the construction of a part 1/2/3 storey building (plus lower ground) to provide 14 co-living units (sui generis) and associated internal amenity space at lower ground floor level, with new lower ground level amenity space to neighbouring buildings, and alongside external communal space at ground and lower ground level.

1.3 This report should be read alongside the application drawings and the Design and Access Statement, prepared by Boehm Lynas Architects.

1.4 The location of the Site is shown in Figure 1, below.

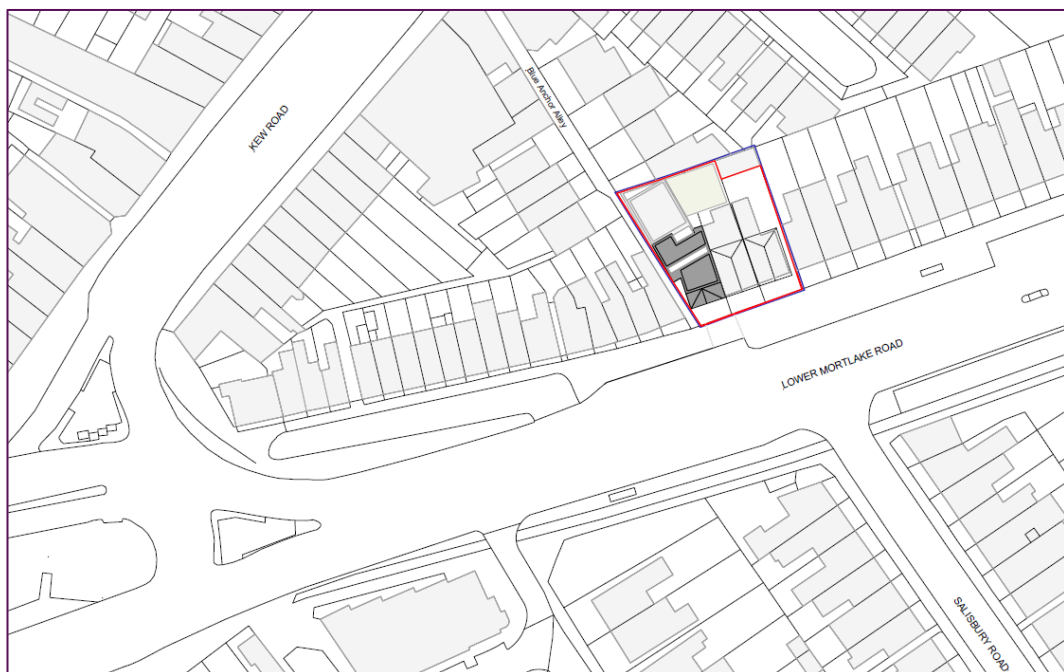


Figure 1: Site Location Plan

1.5 The only designated heritage asset relevant to this application is the Kew Foot Road Conservation Area, which the Site is located immediately adjacent to, within its

setting. The assessment also includes Buildings of Townscape Merit at 15-45 Lower Mortlake Road, located immediately to the west of the Site, however, these have not been identified as non-designated heritage assets and are assessed as integral parts of the conservation area.



Figure 2: View of the Site from Lower Mortlake Road. From Google View March 2018 (no foliage).

The Context

1.6 The Proposed Development has been revised following the refusal of an application submitted to the London Borough of Richmond upon Thames (LBRUT) for the Site in June 2020 (19/3352/FUL) and a dismissal following an Appeal in April 2021 (APP/L5810/D/20/3260364). Heritage was not one of the Reasons for Refusal, and previous amendments had been made to the scheme in order to address any potential heritage concerns raised by the Local Planning Authority during the pre-application stages of the project.

1.7 The Officer’s Report acknowledged the amendments made to the scheme in response to the historic environment and provided positive feedback regarding core elements of the design:

The site of the proposed new building is not within the CA, but any infill design would affect its setting as it is on the boundary. This is an infill site previously

used as a builder's yard. The houses on the north side of Lower Mortlake Road are mainly late Victorian terraces, and the site bounds Blue Anchor Alley leading up to Kew Road. The proposals are considered to have largely followed pre-application advice given in relation to the scale of the development proposed, which included a suggestion to remove a previous proposal to provide box top window at the front, to better relate better to the adjoining pair of houses in Lower Mortlake Road, and to reduce the height to rear.

The proposed front elevation is generally considered to relate well to the adjoining pair of houses which have distinctive front gables. The design is considered to be a positive modern interpretation of the adjoining elevations, which relates to the existing rhythm of street frontages.

The development proposed to the rear is intensive. It is accepted however that this is a sustainable location near the town centre which has a dense development pattern. It is generally acknowledged that this would relate acceptably in terms of scale and design to the prevailing townscape of rather tight grain, and the fenestration arrangement proposed would avoid a dead frontage along the alleyway. The indication of materials is generally considered to be acceptable and to relate well to this setting, subject to appropriate conditions.

In relation to the alleyway elevation, it is considered that the proposals have addressed previous advice provided and would relate adequately to the conservation area setting and would harmonise with the established character and architecture, respect the surrounding built form and subject to conditions, requiring further details of facing materials would adequately respect local character and design quality, in particular policies LP1 and LP3.

Whereas the development would be significantly more intensive than the existing buildings on the site, it is generally accepted in terms of the scale and buildings for this accessible site, close to Richmond town Centre on a busy classified road would generally relate well to the street-scene, and is of an acceptable design for the nature of the product intended and although providing little relief, it is acknowledged that as part of a planning balance of making efficient use of this brownfield site that the scale proposed is within acceptable parameters for the nature of the development. Whereas the development would be large and

assertive on a prominent corner site, it is considered that the design approach is generally acceptable and in accordance with design policies.

There is no in principle objection to the formation of a basement on the site, but any proposed basement extension would be considered in accordance with policy LP11 which states:

A. The Council will resist subterranean and basement development of more than one storey below the existing ground level to residential properties or those which were previously in residential use.

B. Proposals for subterranean and basement developments will be required to comply with the following:

- 1. extend to no more than a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area (this excludes the footprint of the original building);*
- 2. Demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport; a Structural Impact Assessment will be required where a subterranean development or basement is added to, or adjacent to, a listed building.*
- 3. use natural ventilation and lighting where habitable accommodation is provided;*
- 4. include a minimum of 1 metre naturally draining permeable soil above any part of the basement beneath the garden area, together with a minimum 200mm drainage layer, and provide a satisfactory landscaping scheme;*
- 5. demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with policy LP 21 Flood Risk and Sustainable Drainage;*
- 6. demonstrate as part of a Construction Management Statement that the development will be designed and constructed so as to minimise the impact during construction and occupation stages (in line with the Local Environmental Impacts, Pollution and Land Contamination policy of this Plan);*

C. Proposals for subterranean and basement developments, including extensions, as well as lightwells and railings, will be assessed against the advice set out in the Council's SPDs relating to character and design as well as the relevant Village Planning Guidance and the forthcoming

SPD on Basements and Subterranean Developments. Applicants will be expected to follow the Council's Good Practice Guide on Basement Developments.

It is noted that point 2 above requests that an application demonstrates that the scheme safeguards the structural stability of neighbouring buildings and other infrastructure, in this case the highway given its proximity. Whilst a full structural impact assessment is not required, the application advises that there are no ground stability factors identified which could affect the creation of a subterranean level. The application draft Construction Method Statement will also be required to accompany the application. It is considered that the application is in general accordance with the requirements of policy LP11 and there is no specific objection to the principle of a lower ground/basement level.

- 1.8** A full Heritage Statement was prepared by HCUK Group (September 2019) and accompanied the previous application (19/3352/FUL).

Purpose of this Statement

- 1.9** The purpose of this Heritage Impact Assessment is to assist with the determination of the applications by informing the decision takers on the effects of the Proposed Development on the historic built environment. Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals upon that significance are appraised.

- 1.10** The heritage assets affected have been observed and assessed by HCUK Group as part of a site visit. Specifically, this report assesses the significance of the identified listed buildings and the effect of the proposed development on that significance. The report sets out how the proposal complies with the guidance and policy of the NPPF and local planning policy.

2. Relevant Planning Policy Framework

2.1 The decision maker is required by section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a conservation area and its setting when exercising planning functions. There is a strong presumption against the grant of permission for development that would harm heritage significance.¹

2.2 For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³

2.3 The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

2.4 The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF (Annex 2: Glossary) as follows:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

2.5 Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

2.6 The NPPF requires the impact on the significance of a designated heritage asset⁴ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at the end of this Section.

2.7 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.8 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.9 Paragraph 203 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing

⁴ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁶ The balancing exercise was the subject of discussion in City and Country Bramshill v CCLSG and others [2021] EWCA, Civ 320.

applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

2.10 Paragraph 203 of the NPPF may be deemed relevant to the Buildings of Townscape Merit 15-45 Lower Mortlake Road, although they have not been explicitly identified as NDHAs by the Local Planning Authority.

2.11 A full review of local policy has been undertaken. The Richmond Local Plan was adopted in July 2018. The strategic vision includes the following under the 'Villages and historic environment':

The borough's villages and their special and distinctive characters will have been protected, with each being unique, recognisable and important to the community and to the character of the borough as a whole. They will continue to maintain and enhance their distinctiveness in terms of the community, facilities and local character. Heritage assets including listed buildings and Conservation Areas, historic parks as well as Royal Botanic Gardens, Kew World Heritage Site, which contribute so significantly to the character of this borough, will have been protected and enhanced.

2.12 Section 4 of the Local Plan deals with local character and design, and includes the following policies which are relevant in this appeal: Policy LP1 '*Local Character and Design Quality*', Policy LP 3 '*Designated Heritage Asset*', Policy LP 4 '*Non-Designated Heritage Assets*', LP 5 '*Views and Vistas*' and LP 39 '*Infill, Backland and Backgarden Development*'.

2.13 The Kew Foot Road Conservation Area was first designated in 1982, with the Conservation Area Study published in May 2007. The map of the conservation area, which includes the Site's location, is shown in Figure 1. The Conservation Area Study provides information about the historic development and character description. The Site is within the setting of the conservation area along Lower Mortlake Road.

2.14 The London Plan 2021 is the spatial development strategy for greater London and as such a piece of relevant planning policy. Of specific relevance is policy HC1 Heritage Conservation and Growth which notes that "*Development proposals affecting heritage assets, and their settings, should conserve their significance, by*

being sympathetic to the assets’ significance and appreciation within their surroundings.”

Scale of Harm (HCUK, 2019)

2.15 The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).⁷

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁷ See NPPG 2019: “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.” Paragraph 018 Reference ID: 18a-018-20190723.

3. Statement of Significance

Assessment of Significance

3.1 This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and (where applicable) it comments on the contribution of setting to significance. The identification of the heritage assets equates to Step 1 of GPA3 (where applicable), and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 5 (Heritage Impact Assessment).

Kew Foot Road Conservation Area

Historic Development

3.2 Originally in the Hundred of Kingston, Kew is of ancient origin, with first reference to a settlement in 1313. It was written in various spellings⁸, but 'Kew' became widely adopted in the 17th century. The name originates from the Saxon word 'cayho', meaning a quay on a spur of land.

3.3 The history of the area is closely linked to the ferry, which is first mentioned in 1443, but is likely to be much older. The earliest crossings of the Thames at Kew were made on foot⁹, hence the name Kew Foot Road. The ford was superseded by a ferry, and in turn by the bridge built in 1760s. The area is bound by Old Deer Park – a Medieval hunting ground, both were part of the Royal Manor of Richmond. Henry VII built Richmond Palace (known then as Sheen Palace) on the banks of the Thames, which brought popularity to Kew as a residence for courtiers. A History of the County of Surrey (1911) provides evidence of celebrity residents in 16th century which include Mary Tudor, Sir John Dudley, Cromwell, Duke of Somerset, Charles Somerset, first Earl of Worcester amongst other nobles who made Kew their home.

⁸ Kayhor, Kayo, Keyowe, Kaiho, Kayhoo, Cewe, Ceu..

⁹ Julius Caesar is thought to have crossed the Thames at Kew on his first visit to Britain in 53BC (<https://www.telegraph.co.uk/gardening/8301243/A-history-of-Kew-Gardens.html>)

3.4

In the 17th century Kew Palace was built as a fashionable mansion for wealthy London silk merchant, Samuel Fortrey. It is the smallest of all the royal palaces; several other buildings were referred to as Kew Palace throughout history. The palace, which was also called Kew House, had been flamboyantly decorated by William Kent for Frederick, Prince of Wales, who leased it in 1730s, which began a new era of Royal residence in Kew. In 1759 Princess Augusta, mother of King George III, found a nine-acre botanic garden within the pleasure grounds at Kew, marked as Royal Garden in 1746 John Roque's Map (**Figure 3**), and is known today as Kew Gardens, the World Heritage Site. The approximate location of the application site is circled red.



Figure 3. 1746 John Roque's Map "A plan of the cities of London and Westminster, and borough of Southwark"

3.5

At that time Mortlack Lane (today's Lower Mortlake Road) was undeveloped, surrounded by fields on both sides. The construction of the bridge in 1759 was followed by the creation of the Kew Road, which made Kew Foot Lane redundant. By this time Kew Foot Lane became unpopular due to being the main escape route via the ferry for Brentford criminals, it was closed or truncated in 1766. According to Conservation Area Study (LBRuT, 2007):

- 3.6** *It was narrow, dark and intimidating, and increasingly less frequented. Finally, in 1785 a Bill was presented to Parliament to allow for the permanent closure of Love Lane, the old foot road from the Green to the ferry. The king paid for the development of the new Kew Road and an annual payment is still made by the Crown to the town for the upkeep of the road 'from the Bridge to the Bear', (now a shop, formerly the Brown Bear public house) in the Quadrant, Richmond.*
- 3.7** Some sources point to the fact that several grand houses in Kew Foot Road were used as summer houses in the country by nobility. During post-revolutionary upheaval in France, the French Royalists who escaped '*nearly all resided in this district*' (Richmond and Twickenham Times, 1931).
- 3.8** Both Kew Foot Road and Kew Road are functional routes connecting the Surrey bank of the Thames with Brentford. Their origins, however, are different, which is reflected in their character. The development along Lower Mortlake Road is of much later date, and with the transport development transforming this originally local road into a dual carriageway (A316), the environment has changed significantly from its original rural lane located in close proximity to royal palaces. It is a busy route with heavy traffic, being the main artery connecting central London with the south west (merging with M3 Motorway at its origin).
- Kew Foot Road Conservation Area: significance*
- 3.9** Kew Foot Road Conservation Area was designated in September 1982, and is a large almost triangular area shaped by Kew Foot Road and Kew Road, with addition of a small area between Kew Road and Lower Mortlake Road. It is bound in the west by the Old Deer Park Conservation Area, adjoining the Central Richmond Conservation Area to the south and Kew Road Conservation Area to its north east.
- 3.10** The Site is located within the immediate setting of the conservation area, adjacent to its boundary along Lower Mortlake Road, and following the line of Blue Anchor Alley (**Appendices 2.3 - 2.7**).
- 3.11** According to the Conservation Area Statement (LBRUT, 2007) '*the Kew Foot Road Conservation Area is a distinctive and well defined area containing an eclectic mix of building types and uses such as residential, commercial and institutional. This area can be divided into two distinct character areas.*' It then describes Kew Foot

Road and Kew Road as two distinct areas. The Site is located in what could be described a third distinct area, due to its location along a very busy, and of relatively late date, Lower Mortlake Road.

3.12 In summary, the significance of the Kew Foot Road Conservation Area is derived from:

- Historic interest, which is multifaceted and derived from associative and illustrative values. It holds the key to the early connectivity around London via an important crossing, which was first a foot crossing and later served by the ferry. This historic interest is mostly expressed in Kew Foot Road, which is the original route leading to the crossing. The historic interest is also via association with the Royal families and households of two different periods: Tudor and Hanoverian.
- Architectural interest is highly diverse, with buildings representing different periods, most of these are listed or locally listed. The Conservation Area Study (2007) provides a detailed account of such buildings. The Site is not located in any views which include any of the landmark buildings, however, it is adjacent to the row of terraced houses which are designated as the Buildings of Townscape Merit.
- According to the Conservation Area Study (2007) *'The area is not considered to be of high archaeological importance, although many ancient artefacts have been found to the north and west of the site. Finds from the riverbanks include the bones of prehistoric animals, flint tools and later vessels, weapons and pottery'*. The Archaeological interest is therefore limited, it is also not relevant in this application.
- Artistic interest is unknown, it can be interpreted as part of aesthetic qualities of some Victorian buildings, however, it is not applicable to the application.

3.13 The Conservation Area Study refers to the terraces to the west of the Site: "[...] nos. 15-45 (odds), which are Buildings of Townscape Merit, have been badly altered by the replacement of most windows and doors, and it is proposed to introduce an Article 4(2) Direction to ensure that the quality of this row, which is so prominent in the Borough, should be improved and maintained. Any opportunity to replace the fenestration with appropriate timber sashes should be taken."

3.14 Blue Anchor Alley is referred to in the Study as “... *charming pedestrian cut-through is a fascinating lane but suffers from the impact of the ugly wall of the yard at 88 Kew Road. The concrete slab paving is inappropriate and in poor condition and the concrete lamp posts are unattractive. The pretty little cottages have been damaged by some inappropriate bow window fenestration.*”

Kew Foot Road Conservation Area: Setting and Site's Contribution

3.15 The Site is adjacent to the south eastern boundary of the conservation area in the most informal part of the setting, Blue Anchor Alley. The Site comprises below ground levels of Nos 47 and 49 as the vacant plot of 47a, formerly used as a building yard, with a tall brick wall providing a strong boundary to Blue Anchor Alley.

3.16 This part of the conservation area, to the west of the Site, is formed by a continuous line of terraced cottages at 15-45 Lower Mortlake Road, homogenous in scale, layout and design. The setting to the east of the Site includes a double gable of 47 & 49 Lower Mortlake Road (**Appendix 2.8**), which provides interest in the streetscape, being the only gable end facing the main road within the long row of ridges parallel to the road. This feature, together with the red brick, which contrast with the stuccoed 51-53 Lower Mortlake Road, is a strong presence in the streetscape. The setting in this part is eroded due to the heavy traffic which creates a feeling of a transient space. This is very different to the nature of the conservation area at its core, around Kew Foot Road and the parallel streets leading to Kew Road. The setting in this location does not contribute to the significance of the Kew Foot Road Conservation Area, as a result of the changes in road network in the 20th century.

3.17 The visible component of the Site is at present an unsightly gap in the immediate setting of the conservation area, which is predominantly a tightknit residential development. This gap was the result of the historic ownership and subdivision of the original plots for building within the historic grounds of Pagoda House, still visible in the Ordnance Survey Map 1894-96 (**Appendix 1.1**). It is an anomaly within the existing urban character, which is largely based on the densely built up plots, along Lower Mortlake Road. The Site is a negative presence within the setting of the conservation area due to its unusual appearance as a gap in the streetscape

which otherwise consists of continuous street frontages; the vandalism and fly tipping within and around the open disused yard area of the Site (due to being vacant) also detract from the area's significance. It has the same role within the setting of the nearby Buildings of Townscape Merit (BTMs).

4. Heritage Impact Assessment

Introduction

- 4.1** This chapter of the report assesses the impact of the Proposed Development on the significance of the heritage assets identified in the previous chapter, including (where applicable) effects on the setting of those assets. This chapter should be read in conjunction with the preceding chapter.
- 4.2** This chapter first describes the works proposed at the Site on Lower Mortlake Road, Richmond, it should be read alongside the application drawings and DAS.

Impact Assessment

- 4.3** The Proposed Development comprises the construction of a part 1/2/3 storey building (plus lower ground) to provide 14 co-living units (sui generis) and associated internal amenity space at lower ground floor level, with new lower ground level amenity space to neighbouring buildings, and alongside external communal space at ground and lower ground level.



Figure 4: Massing comparison – Appeal Scheme (above) and Proposed Development (below)

The Kew Foot Road Conservation Area

- 4.4** The Site and area walkover indicates that there have been dramatic changes within the hierarchy of routes within the 20th century, which has changed dramatically how the built environment is experienced. Lower Mortlake Road was a local route when it was developed, while Kew Road was a major connection with the crossing to Brentford and London.
- 4.5** The proposals represent a transformation of a redundant, vacant site, offering an improvement to views along Blue Anchor Alley and Lower Mortlake Road. The proposed scheme includes a faceted/splayed corner entrance along the entrance to Blue Anchor Alley, widening the entrance to the alley before it gets narrower further into the alley, creating a funnelling affect. This approach is evident in other parts of the alley, where the cottages which are included in the conservation area boundary are located. A recent development at the northern extreme of the alley also includes a similar spatial treatment.
- 4.6** The impact of the proposals is assessed to be positive for the following reasons:
- The Site, in its current vacant state, does not contribute in any meaningful way to the significance of the conservation area and the setting of the Buildings of Townscape Merit, hence the changes in the appearance which involve a new building with frontages onto Blue Anchor Alley and Lower Mortlake Road will be a considerable improvement within the setting, and, therefore, enhancement of the significance of the Kew Foot Road Conservation Area, and, similarly, the Buildings of Townscape Merit;
 - The materials of the scheme respond to the context, with red brick closely matching that of the neighbouring double gabled No. 47-49 Lower Mortlake Road. The proposed gabled frontage onto Lower Mortlake Road offers a seamless integration into the streetscape;
 - The two-storey part of the building responds to the context along Blue Anchor Alley, creating a lightweight addition of timber and glazed areas. The slight widening of the alley and the introduction of the planters will enhance the views;
 - The corner entrance will reactivate the Site's role within the setting of the conservation area, providing a pleasant feature in the long view of the

terraces, specifically the BMTs to the west. In effect, the proposed building will complete the row of the terraces, complementing the character of the conservation area by infilling the uncharacteristic gap;

- The creative approach to the layout and the use of sunken gardens means that there will be private areas, hidden from view and the noise of the main road, responding to the nature of the cottages located along Blue Anchor Alley (**Appendix 2.6**). The sunken garden at the front of the Site will have a neutral impact on the significance of the conservation area, it will not affect the views of the proposed development in association with the southern extreme of the conservation area, which mostly consists of the terraces designated locally as BMTs;
- The design, siting, height, width, scale and bulk will not result in a dominant form of overdevelopment. The proposals are considered to be a sensitive response to the heritage constraint of the Site's context.
- The new lower ground amenity space proposed to Nos. 47 and 49 will have no effect on the setting of the Conservation Area or cause any impact to its character, appearance and significance.

4.7 Summarising the above, the potential effects of the proposals are assessed to be positive, in terms of the changes to the setting of the Kew Foot Road Conservation Area, and the Buildings of Townscape Merit, located nearby and forming a southern edge of the conservation area. The scheme offers a clear improvement in views, appearance and safety within the immediate setting of the heritage assets. It has been developed alongside the Council's advice and is a sensitive and sustainable solution for the Site, respecting its historic context.

4.8 The proposed scheme is in accordance with local policy LP1 '*Local Character and Design Quality*' as it is designed with a thorough understanding of the Site and its existing context. In addition, the layout, siting and access, according with policy LP 1, is making best use of land. It will also respect the relationship with the heritage assets, as discussed in detail above.

4.9 The proposals are assessed to be compliant with the requirements of the local policy LP3 '*Designated Heritage Asset*' by making a positive contribution to the historic environment of the borough.

- 4.10** In terms of Policy LP 4 '*Non-Designated Heritage Assets*', the proposals are in keeping with the policy, as they preserve the significance, character and setting of the Buildings of Townscape Merit.
- 4.11** The proposed scheme has been assessed to be compliant with National Planning Policy, in particular paragraph 206 which encourages local authorities to look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance.

5. Conclusions

- 5.1** This Heritage Impact Assessment provides an assessment of the character and significance of the Kew Foot Road Conservation Area and the contribution made by its setting, in particular the application site. It then assesses the potential effects of the application proposals on the setting and significance of the conservation area and the Buildings of Townscape Merit.
- 5.2** The application scheme involves a part 1/2/3 storey building with a basement, which responds to its built context by offering frontages onto both Blue Anchor Alley and Lower Mortlake Road, as well as new internal amenity space at new lower ground level to Nos. 47 and 49.
- 5.3** This assessment demonstrates that the application site is a negative presence within the setting of the conservation area (and that of the Buildings of Townscape Merit which are assessed as an integral part of the conservation area). The current poor contribution is due to the Site's vacant state and the vandalism it attracts, but also due to the uncharacteristic gap in the streetscape.
- 5.4** The proposals provide a sensitive, well-thought through solution in terms of creating important frontages onto both Lower Mortlake Road, a busy thoroughfare, and Blue Anchor Alley, an informal pedestrian route of historic origin. The scheme introduces 'eyes on the street' along a rather unpleasant part of Blue Anchor Alley which is narrow and canyon-like due to the tall windowless walls. The proposals include important circulation spaces and planting facing the alley, with a slight set back, enhancing views.
- 5.5** The proposals offer a considerable enhancement in terms of the contribution of the Site to the setting and significance of the conservation area, and similarly to the Buildings of Townscape Merit at 15-45 Lower Mortlake Road.
- 5.6** Overall, the scheme will be a positive contribution, complementing architectural and historic values of the conservation area. This impact assessment, based on the analysis of the significance and the application site's contribution to that significance, has shown that the application proposals are in keeping with Richmond Council's Local Plan policies LP1, LP3, LP4, LP5 and LP39. With reference to the

NPPF there is no identified harm to heritage significance. The proposals are in accordance with paragraph 206 which encourages the *'local planning authorities to look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance'*.

Appendix 1: Historic Maps



Appendix 1.1. 1894-96 OS Map. 6 inch. London X.NW (includes: Barnes; Chiswick St Nicholas; Kew; Mortlake; North Sheen; Wandsworth Borough.)



Appendix 1.2. 1898 OS Map, 25 inch. Surrey VI.4 (Heston and Isleworth; Petersham; Richmond; Twickenham St Mary The Virgin)



Appendix 1.3. OS Map 1913. 25 inch. Surrey I.16 (Heston and Isleworth; Kew; North Sheen; Richmond)



Appendix 1.4. OS Map 1936. 25 inch. Surrey VI.4 (Heston and Isleworth; Petersham; Richmond; Twickenham St Mary The Virgin)

Appendix 2: Site Photographs



Appendix 2.1. Photograph showing the Site from Lower Mortlake Road.



Appendix 2.2. Photograph showing the Site looking north (from within the boundary)



Appendix 2.3. Photograph showing the view along Blue Anchor Alley, looking south, the Site is on the far left.



Appendix 2.4. Photograph showing the recent development at the northern extreme of Blue Anchor Alley (which provides precedent for the proposals)



Appendix 2.5. Photograph showing the view along Blue Anchor Alley (the Site is located on the right)



Appendix 2.6. Photograph showing the late gardens of the Victorian cottages along Blue Anchor Alley.



Appendix 2.7. Photograph showing the view along Blue Anchor Alley towards Kew Road



Appendix 2.8. Photograph showing the double gable to the east of the Site.



Appendix 2.9. Photograph showing the gabled Victorian terraces to the north east of Christ Church, within the immediate setting of the conservation area (part of Kew Road Conservation Area)



Appendix 2.10. Photograph showing the gables of the Victorian terraced houses along Kew Road



Appendix 2.12. Photograph showing Christ Church on Kew Road, a landmark building



Appendix 2.13. Photograph showing the view into Blue Anchor Alley from Kew Road



Appendix 2.14. Photograph showing the two buildings framing the entrance to Blue Anchor Alley from Kew Road

Standard Sources

<https://maps.nls.uk>

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