

BRIDGES
Fund Management

Bridges Healthcare (Richmond) Limited



RICHMOND INN

Townscape, Heritage & Visual Impact Report

KMHeritage

Richmond Inn
50-56 Sheen Road, Richmond-upon-Thames, TW9
1UG

Townscape, Heritage and Visual Impact
Assessment

May 2022

Consultancy for the
Historic Built Environment

KMHeritage

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1 Introduction

- 1.1 This report has been prepared by KMHeritage for Bridges Healthcare (Richmond) Limited to support a full planning application for the scheme pertaining to Richmond Inn, 50-56 Sheen Rd, Richmond upon Thames, TW9 1UG.
- 1.2 The application is for the partial demolition and extension of Richmond Inn for Class C2 visitor accommodation providing care and physiotherapy-led rehabilitation, highways works, car and cycle parking, refuse storage, landscaping and other associated works.
- 1.3 The purpose of this report is to consider how the proposed works address the statutory requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and to assess the works against national and local policies and guidance relating to the historic built environment.
- 1.4 This report should be read in conjunction with the DAS and drawings from Ackroyd Lowrie as well as other material submitted with the application.

Organisation

- 1.5 This introduction is followed by a description of the history of the Site in Section 2, Section 3 analyses the heritage and townscape significance of the Site and its context and Section 4 sets out the relevant national and local policy and guidance relating to the historic built environment. An analysis is provided, in Section 5, of the proposed development and its effect in heritage and townscape terms and Section 6 contains a Visual Impact Assessment in respect of the proposed scheme. Section 7 examines the proposal in terms of policy and guidance, and Section 8 is a summary and conclusion.

Authorship

- 1.6 The author of this report is Anne Roache MA MSc. Anne is a built heritage and conservation professional who has

worked for leading commercial organizations in the fields of property, planning and law.

2 The site and its context

- 2.1 This section of the report gives a brief history of the Richmond Inn, and analyses the heritage significance of the site and its context.

The site

- 2.2 The site comprises the existing Richmond Inn, a 44-bed hotel which has been vacant since its closure in March 2020. It is located on the corner of Sheen Road and Church Road, Richmond, an important junction of two key routes through this part of the borough (fig. 1).
- 2.3 The site extends to 0.13ha in total and comprises the hotel building (with ancillary meeting rooms and lounges), a central courtyard area and a surface car park for customers which is accessed from Sydney Road. The main entrance is located on Sheen Road. The Sheen Road frontage comprises four storeys in total, whilst the Church Road and Sydney Road frontages provide three storeys of accommodation.
- 2.4 Richmond Inn lies within the Sheen Road Conservation Area and is denoted as a Building of Townscape Merit in the London Borough of Richmond upon Thames' 'Local List'.

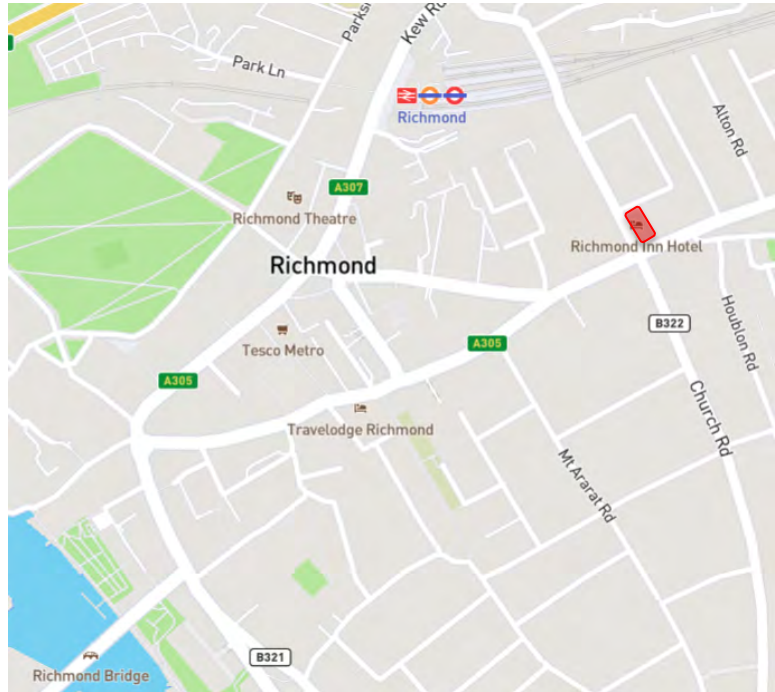


Figure 1: The site location

A brief history of Richmond

- 2.5 The area in and around Richmond town, originally known as Sheen, was, from the medieval period, a favourite of royalty. In 1501 Henry VII rebuilt the old palace at Sheen in a much grander style, renaming the manor 'Richmond', after his earldom of Richmond in Yorkshire. Henry VII died at the palace in 1509 and later that same year, Henry VIII spent Christmas there with his queen, Katharine of Aragon. Royal patronage continued throughout the ensuing centuries establishing Richmond as a centre for the Court which in turn promoted the building of large houses and Inns around The Green.
- 2.6 The old town grew up, for the most part, on the eastern side of the site of the Tudor palace but apart from the few remaining relics of that palace, and one or two other structures, old Richmond is essentially a Queen Anne and Georgian town.
- 2.7 The old-established route of George Street can be clearly traced on John Rocques Map of 1761 with buildings

being indicated along both sides. The Church of St Mary Magdalene (c.1507/1750/1903), set within its churchyard, can be seen south of George Street with the open expanse of Richmond Green to its north (fig. 2¹). Richmond Bridge was completed in 1777.



Figure 2: Central Richmond, Rocque 1761 (future location of site indicated)

- 2.8 An increase in population at the end of the 18th century saw substantial houses erected on the south-east side of The Green with development spreading south to extend the commercial centre, during the 18th and 19th centuries.
- 2.9 The first edition OS shows that the key routes through the town had been established by the mid-19th century with scattered, largely detached, properties and its wider context being dominated by the open spaces of the Royal parklands (fig. 3).

¹ Rocque 1761 An exact survey of the city's of London Westminster, XV.



Figure 3: Richmond town, OS map first edition extract, 1856

- 2.10 The arrival of the railway link to London in 1846 accelerated the town's development so that in the space of 50 years, its population had increased from 9,255 in 1851 to 25,577 by 1901. The construction of the railway cut the town centre off from the Old Deer Park and much later, in the 1920s, the construction of the A316 further increased this separation. This allowed the two parts of old and new Richmond to evolve at different rates, with the area to the north retaining its large open spaces based around the old Royal and landed estates.

- 2.11 The OS published in 1871 shows the town centre built up to its fullest extent (fig. 4²). The site of Richmond Inn and its environs have been developed with residential properties including along the newly developed route of Church Street leading to the railway station.



Figure 4: The site and its environs, 1868 (Site indicated)

- 2.12 Today, George Street leading to The Quadrant and Richmond station is the commercial heart of the town with its courts and alleyways providing a reminder of the earliest settlement pattern. The Green remains largely residential in nature and to its west the buildings of Old Palace Yard recall the area's earliest royal connections, with the houses of Maids of Honour Row (1724) having been built for the companions of Queen Caroline, the consort of George II.
- 2.13 The Borough of Richmond upon Thames is primarily residential in character, although it still retains some small

² OS Surrey Sheet VI Surveyed: 1867 to 1868, Published: 1871.

riverside industries such as yards for building and repairing small craft. Nearly two-fifths of its area is maintained as public open space, including Richmond and Bushy parks (both former royal hunting grounds), Barnes Common, Sheen Common, Ham Common, Marble Hill Park, and Old Deer Park. Kew Gardens, the internationally renowned botanical garden and World Heritage Site, was developed on the site of the former royal estate.

A summary of the evolution of Richmond Inn

- 2.14 Sheen Road is part of an historic route between Richmond and London and was home to scattered development during the 18th century (fig. 3). As the 19th century progressed, development increased and began to cover formerly green-field sites, prompted in no small part by the arrival of the railway to Richmond in 1846 (fig. 4).
- 2.15 Church Road was cut through from Sheen Road, roughly along the line of an earlier country lane, to access the new railway station when it opened in 1846. The Church for which Church Road is named, St John the Divine on Kew Road, was completed in 1836. The houses along Church Road and this part of Sheen Road were substantial, semi-detached family houses, of three storeys over basement and with large rear gardens. Those behind Sheen Road being largely built on green-field sites.
- 2.16 Richmond Inn was developed from a pair of mid-19th century villas facing onto Sheen Road. A post-war aerial photograph from the shows the two original houses that make up the Site and their extensive rear gardens (fig. 5³).
- 2.17 The property ceased to be purely residential and was in use as a hotel from a least the 1970s until 2020. During this period, the building's footprint was increased a number of times during several phases of alteration. It had been extended to the rear by 1960 with an outbuilding erected in the garden however its most

³ Layers of London, RAF Aerial Collection (1945-1949)

extensive phase of development was during the later 1990s when the extensions along Church Road and Sydney Road were constructed. Historical mapping illustrates the changes to the building's footprint over time (figs. 6-8).



Figure 5. 50-56 Sheen Road, 1945-49

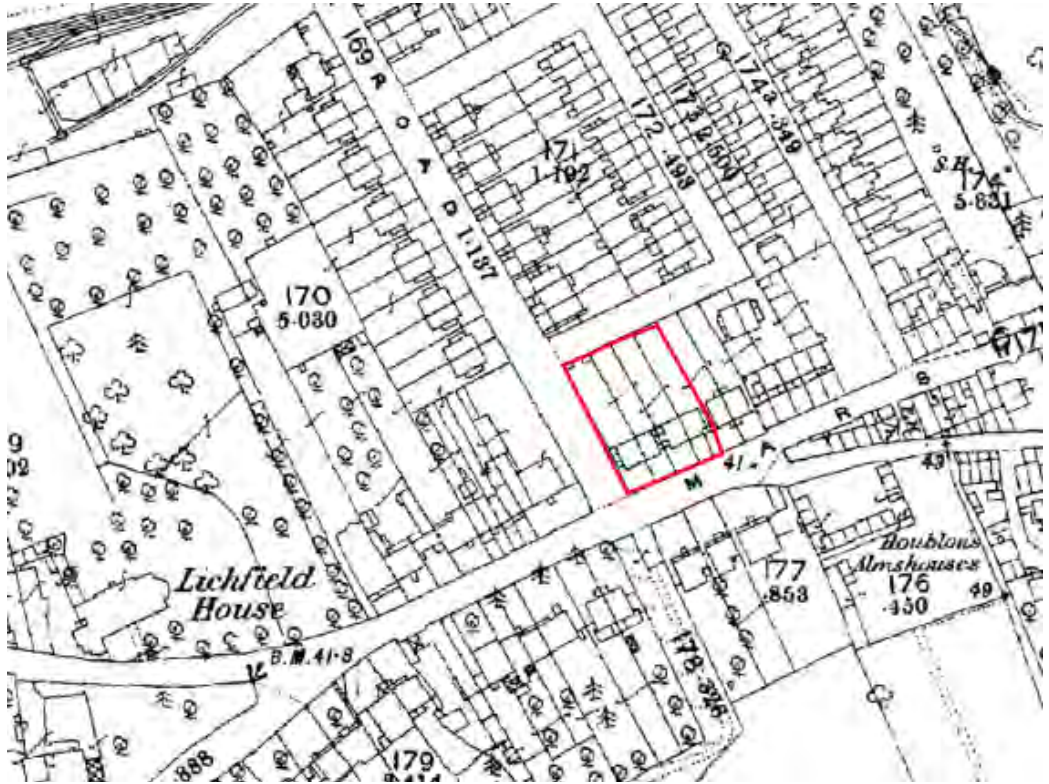


Figure 6: OS 1879



Figure 7: OS 1879 (detail)



Figure 8: OS 1960

- 2.18 Figure 9⁴ shows the hotel as it was in 1977 and before the major alteration and extension works took place. The image shows that there has been very little change to the front elevation since then, except for closing the corner entrance to the hotel and replacing it with a window and the introduction of a dormer and canopied central entrance.

⁴ © London Metropolitan Archives ,50-56 Sheen Road, Richmond: front elevations 1977 Record No 164721



Figure 9: The Site in 1977

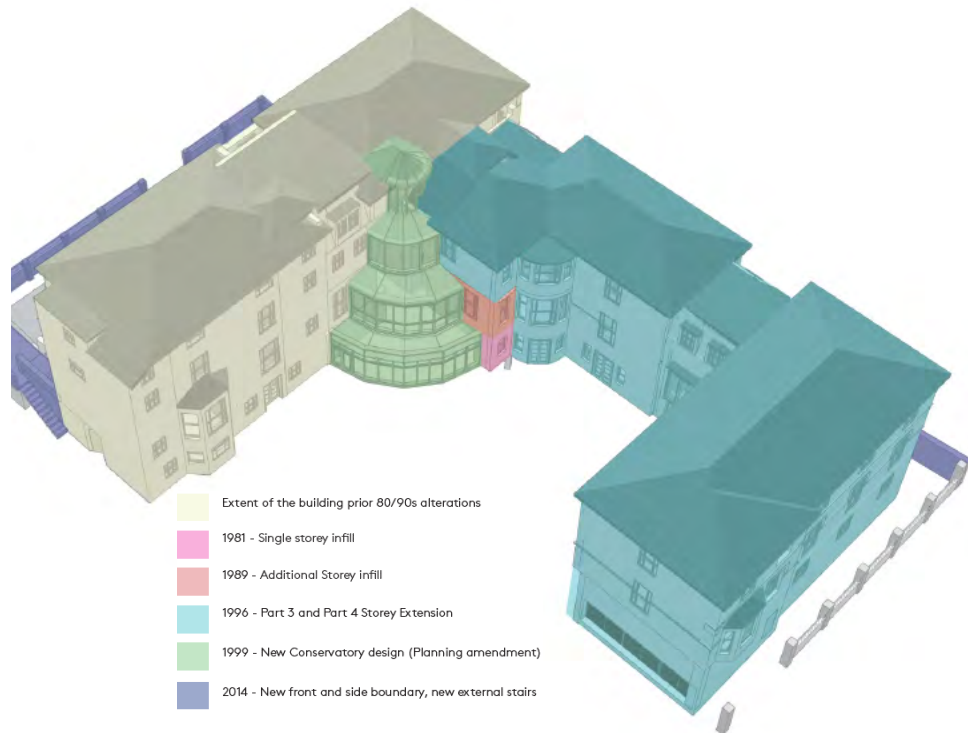
- 2.19 The 1980s saw the first of a number of planning applications for alterations to the hotel.⁵ In 1981 alterations were made to the ground floor to provide a residents' bar and a single storey infill link extension to the Sheen Road elevation. 1989 saw the construction, at the rear, of additional storey above the existing lower ground floor dining room.
- 2.20 1996 saw the major scheme to add a part 3/part 4 storey extension fronting Church Road and Sydney Road, and a new conservatory, main entrance and link building to the Sheen Road Frontage. An application for amendments to the permitted scheme was approved in 1999.⁶ In 2014 an application to demolish and rebuild the front and side boundary walls, extend existing front paved area, and rebuild existing external stairs was approved.⁷

⁵ LBRuT Planning REF: 80/1421 Date: 26/01/1981; REF:89/0160/FUL Date: 15/03/1989;

⁶ LBRuT REF:96/2346/FUL Date: 27/09/1996; REF:98/1017 Date: 26/03/1999

⁷ LBR REF:13/4389/FUL Date: 07/03/2014

2.21 The current configuration of the building is the result of iterative changes over the past 40 years which have resulted in a buildings which does not quite hang together architecturally and creates practical issues



internally (fig. 10).

Figure 10: Axiometric plan of the Site (NE view) illustrating building phases

2.22 Facing onto Sheen Road, the building retains a semblance of the original paired semi-detached villa appearance however adaptation for hotel use has severely diluted this character over time. Several aspects of the building's present appearance are unfortunate such as the extensive use of painted pebbledash, the awkwardness of the interstitial mansard treatment on Sheen Road and the incongruous entrance canopy above modern marble steps.

2.23 The 1996 extensions onto Church Road and Sydney Road are awkward in their execution with the hanging bay windows at the first floor level an unsuccessful

interpretation of a traditional Victorian feature found elsewhere on Church Road.

- 2.24 To the rear, little remains of the original mid-19th century appearance and what character remains is overshadowed by the 1990s conservatory extension (figs. 11-14). Where there were once well-maintained gardens, there is now car parking and extensive hard-landscaping. Internally, there are no remaining features of heritage interest.



Figure 11: Sheen Road elevation



Figure 12: Sheen Road entrance



Figure 13: Church Road elevation



Figure 14: Sydney Road and rear elevations

Townscape context

- 2.25 Richmond Inn is set on a prominent corner site where Church Road and Sheen Road meet. Sheen Road is part of an important west-east route between the River Thames and central south London. Church Road is a key route carrying north-south traffic between Richmond rail and Underground station and points south without having to travel through the town centre. Traffic can be heavy, several bus routes pass outside the property (there is a bus stop opposite), and the busy junction and pedestrian crossings here are controlled by traffic lights.
- 2.26 Adjacent to the Site, to the east is the three-storey, semi-detached stock brick residences Nos. 58-60 Sheen Road, which are set-back on the same building line as the Site. Further west from here is a three-storey, flat-fronted terrace that comes forward to the pavement building-line, comprising shop units at ground floor and residential above which marks the start of the small-scale commercial

section of Sheen Road with a more mixed building typology, having developed in a more piecemeal fashion over several centuries.

- 2.27 Opposite, the Site, on the west side of Church Road is a double-fronted 19th century house, which is now a hotel, having a modern extension stretching back along Church Road. Sheen Road moving east is home to large early 19th century terraced and detached houses set-back behind long front gardens, heavily screened by trees. Similarly, opposite the Site on the south side of Sheen Road, are three large, detached residential properties set back behind long front gardens and immediately to their west, is the turn off onto Worple Way and the Houblon's Almshouses (1757/8, GII) set back behind a walled courtyard.
- 2.28 Sheen Road holds a good cross-section of building characteristic of a main road running out of a town with isolated Georgian houses and fragments of 18th century terraces, surrounded by later Victorian development. Many of its buildings are either Listed or have been designated as Buildings of Townscape Merit and placed on the London Borough of Richmond upon Thames Local List.
- 2.29 The houses along Church Road are substantial, semi-detached, family houses, of three storeys over basement, set-back from the pavement behind low (mostly) brick walls and small front gardens/sub-basement light wells, with large rear gardens. Having been erected as a piece, they have a shared aesthetic of stock brick, slate roofs and large bay windows. Almost all are designated Buildings of Townscape Merit on the London Borough of Richmond upon Thames Local List.
- 2.30 Overall, the area around the Site is a mixed proposition - predominantly residential with a preponderance of large 19th century detached and semi-detached houses, the majority of which have been split into flats – alongside local shops and services bisected by bust roads.

3 The heritage and townscape significance of the site and its context

The heritage context of the site

- 3.1 The heritage context of the Site has been established through a search of the Greater London Historic Environment Record, the National Heritage List for England and online resources provided by the London Borough of Richmond upon Thames.

Conservation Area

- 3.2 Richmond Inn is located in the Sheen Road Conservation Area, which was first designated in July 1977 (fig. 15).
- 3.3 The conservation area statement⁸ describes its character as having two distinct elements: the development along Sheen Road, which includes a large number of 18th and early to mid-19th century buildings; and the later 19th century residential streets running up to the railway line north of Sheen Road.
- 3.4 Sheen Road itself is a mixed street of with small shops and businesses interspersed with residential use. The traditional shop-fronts that remain are important elements. Worple Way splits off from Sheen Road towards the centre of the conservation area with the Red Cow fronting the apex of the junction. At the eastern end of Sheen Road the boundary wall of Christ's School, though outside of the conservation area, is an important element.
- 3.5 The conservation area holds a high concentration of listed buildings, mostly dating from the 18th century. The two courtyard groupings of mid-19th century almshouses: Hickeys Almshouses and Houblons Almshouses, provide quiet respite from the busy main road.
- 3.6 Houses are mostly set in gardens with mature trees and a strong frontage line is maintained by the buildings or their

⁸ LB Richmond upon Thames CA Statement:
www.richmond.gov.uk/media/13297/conarea31_a3_rgb.pdf

boundary walls defining the back of pavement. Street trees add a further layer of greening. Many of the streets off Sheen Lane host a number of large 19th century houses which have been designated Buildings of Townscape Merit; Church Road being a particularly good example of this where almost all of its houses are locally listed.

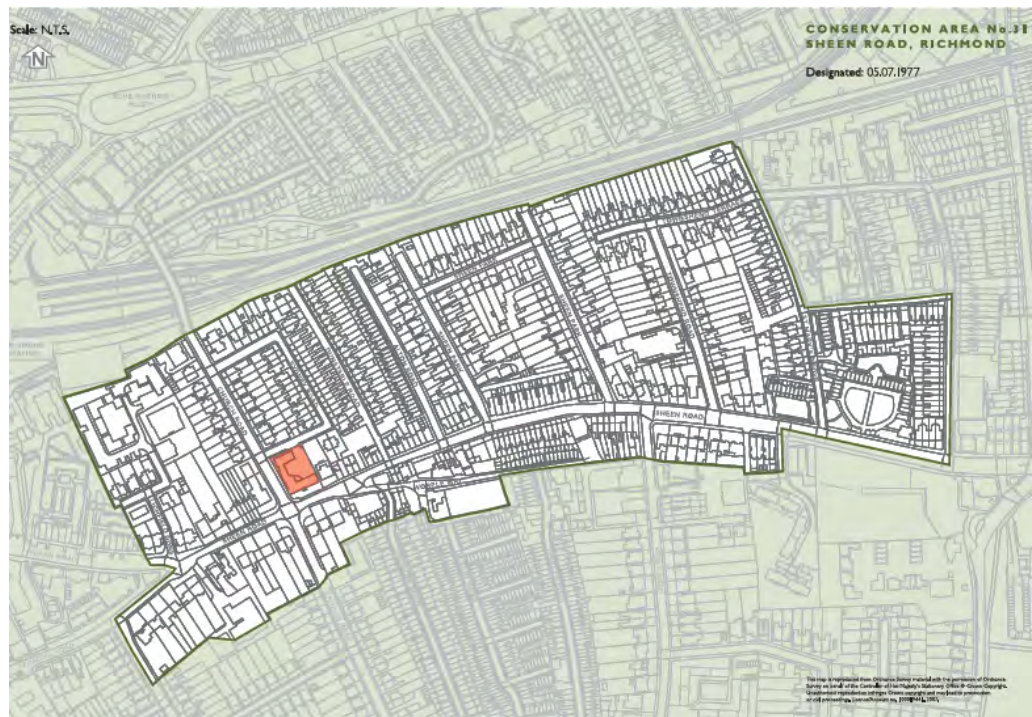


Figure 15: Sheen Road Conservation Area (site indicated)

Listed buildings

- 3.7 Richmond Inn is not a statutorily listed building.
- 3.8 There are a number of buildings in the vicinity of the Site which are listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for their special architectural or historic interest (fig. 16). These are:

*Grade II**

- Worple Way: Houblon's Almshouses;

Grade II

- Paradise Road: Chalom House (No. 8);

- Sheen Road: No. 34, Marshgate House (36), 38, 40-46, Court Lodge (41), 43, 45, 69.



Figure 16: Listed buildings in the vicinity of The Richmond Inn

Non-designated heritage assets

- 3.9 A Locally Listed building (also known as a ‘Building of Townscape Merit’) is a building or structure which is not statutorily listed, but is recognised for its significance to the history and character of the local environment.⁹ For the purposes of the National Planning Policy Framework (NPPF), these are classed as ‘non-designated’ heritage assets.
- 3.10 Richmond Inn, 50-56 Sheen Road, is designated as a Building of Townscape Merit by the London Borough of Richmond upon Thames (reference 82/00850/BTM)¹⁰.
- 3.11 Other nearby Locally Listed buildings include:

⁹ LB Richmond upon Thames Buildings of Townscape Merit SPD, May 2015

¹⁰ LB Richmond upon Thames Local List

https://www.richmond.gov.uk/locally_listed_buildings

- Church Road: 2, 4, 10-54 (even), 19-23, 27-53 (odd);
- Sheen Road: 30-32, 48-80 (even), 37-39, 47-55, 59, 63-65, 69-71, 77 -79 (odd).

Assessing heritage significance

Concepts and terminology

3.12 The Sheen Road Conservation Area and nearby listed buildings, are all ‘designated heritage assets’, as defined by the National Planning Policy Framework (‘NPPF’).¹¹

3.13 ‘Significance’ is defined in the NPPF as

‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’ Historic England’s ‘Historic Environment Good Practice Advice in Planning Note 2’ puts it slightly differently – as ‘the sum of its architectural, historic, artistic or archaeological interest’.

3.14 Historic England’s ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’¹² describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value.

‘Historic interest’ or ‘Historical value’ and ‘Evidential value’

3.15 In terms of Historic England’s ‘Conservation Principles’ the Site and its surroundings provide us with ‘evidence

¹¹ First published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. Ministry of Housing, Communities & Local Government (2021) *Revised National Planning Policy Framework*. Online: www.gov.uk/guidance/national-planning-policy-framework

¹² English Heritage (2008) *Conservation Principles, Policies and Guidance for the sustainable management of the historic environment*. Online: <https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment>

about past human activity' and, by means of the fabric, design and appearance of the site and surrounding built form, communicates information about its past.

Alteration, demolition and redevelopment has not entirely removed the ability of the site and other historic buildings in the vicinity to do this, and the site and the conservation area retain sufficient historic character and appearance to convey historical ethos

3.16 Historical value is described as being illustrative or associative. The site, the listed and unlisted buildings nearby, and their relationship to one another and the Sheen Road Conservation Area collectively illustrate the development of this part of Richmond. They tell us about the nature of physical change in the area between the 18th and 21st centuries, about social and economic transformations during that period, the dynamics of later change that replaced earlier development and its effect upon the historic building stock and urban grain.

3.17 As part of an urban context, and because of its own history and associations the Richmond Inn thus has evidential and historical value.

'Architectural interest', 'artistic interest' or 'aesthetic value'

3.18 'Architectural' and 'artistic interest' (NPPF) or 'aesthetic value' ('Conservation Principles'). In respect of design, 'Conservation Principles' says that *'design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship'*.

3.19 The Richmond Inn has these values, and the external architectural expression of the oldest part of the building remains that of a pair of 19th century houses built for a wealthy family. Later, 20th century alterations have, however, removed any interest internally.

3.20 The nearby heritage assets and the historic townscape also possess these values. The listed buildings near the site

have, by definition, 'special architectural interest' as well as special historic interest, and in respect of any development at Richmond Inn that might affect their setting, that special interest, or aesthetic significance, has to do with their external architectural design and appearance including their scale, massing, materiality and roof profiles.

- 3.21 The aesthetic value of these listed buildings, as well as the Sheen Road Conservation Area and the nearby Locally Listed buildings, is supported and enhanced by their relationship with the older townscape, the historic street pattern, the urban quality, scale and form of spaces and created by the buildings within the conservation area, and in views within and into it.

Townscape significance

- 3.22 The townscape significance of the Site lies in its location at the junction with of Sheen Road and Church Road – a key route through central Richmond - and its relationship with the nearby heritage assets described above.

Conclusion

- 3.23 The Richmond Inn holds evidential, historical, and aesthetic value. Any proposals for works to the fabric of the building must support those values and pay special regard to maintaining and enhancing the setting of nearby Listed Buildings and the character and appearance of the Sheen Road Conservation Area.

4 The legislative, policy and guidance context

Introduction

- 4.1 This section of the reports sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 4.2 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66(1) of the Act requires decision makers to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' when determining applications which affect a listed building or its setting.
- 4.3 Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.

The National Planning Policy Framework (NPPF)

- 4.4 The National Planning Policy Framework (NPPF) was first published in 2012 with the most recent update being published on 20 July 2021.¹³
- 4.5 Chapter 12. of the National Planning Policy Framework 'Achieving well-designed places' deals with design: It begins:

'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning

¹³ First published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. Ministry of Housing, Communities & Local Government (2021) Revised National Planning Policy Framework. Online: www.gov.uk/guidance/national-planning-policy-framework

and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process' (paragraph 126).

4.6 Paragraph 130 advises that 'planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not

undermine the quality of life or community cohesion and resilience.

4.7 Chapter 16 ‘Conserving and enhancing the historic environment’ deals with Heritage Assets describing them as ‘*an irreplaceable resource*’ that ‘*should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*’ (paragraph 189).¹⁴

4.8 Paragraph 190 discusses the responsibilities of the local authority towards plan making and the historic environment and says that: ‘*Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

(a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

(b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

(c) the desirability of new development making a positive contribution to local character and distinctiveness; and

(d) opportunities to draw on the contribution made by the historic environment to the character of a place.’

4.9 Paragraph 191 advises that ‘*when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.*’

¹⁴ The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

4.10 In order to help assess significance of heritage assets, paragraph 192 says that local planning authorities *'should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:*

(a) assess the significance of heritage assets and the contribution they make to their environment; and

(b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.'

4.11 Further such 'information about the historic environment, gathered as part of policy-making or development management' should be made 'publicly accessible' (paragraph 193).

Proposals affecting heritage assets

4.12 *'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation'* (paragraph 194).

4.13 *'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a*

proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal' (paragraph 195).

4.14 *'Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision' (paragraph 196).*

4.15 *'In determining applications, local planning authorities should take account of:*

(a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

(b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

(c) the desirability of new development making a positive contribution to local character and distinctiveness' (paragraph 197).

4.16 *'In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal' (paragraph 198).*

Considering potential impacts

4.17 Paragraph 199 advises local authorities that *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

4.18 Paragraph 200 continues, *‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.’¹⁵*

4.19 In terms of proposed development that will lead to substantial harm to (or total loss of significance of) a designated heritage asset, paragraph 201 states that *‘local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use’.

¹⁵ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

- 4.20 It continues *‘where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’* (paragraph 202).
- 4.21 In considering the effect of an application on the significance of a non-designated heritage asset, either directly or indirectly, the local authority should employ a *‘balanced judgement’* in regard to *‘the scale of any harm or loss and the significance of the heritage asset’* (paragraph 203).
- 4.22 Paragraph 204 requires that *‘Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.’*
- 4.23 Where a heritage asset is to be lost, the developer will be required to *‘record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible’* (paragraph 205).¹⁶
- 4.24 In terms of development within the setting of heritage assets, paragraph 206, advises that *‘local planning authorities should 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. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.’*
- 4.25 It goes on however that *‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated*

¹⁶ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole (paragraph 207).

- 4.26 Finally, paragraph 208 requires that the onus will be on local planning authorities to *'assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies'*.

Planning Practice Guidance

- 4.27 Planning Practice Guidance¹⁷ provides streamlined guidance for the National Planning Policy Framework and the planning system. The section entitled 'Conserving and Enhancing the Historic Environment' gives guidance on matters relating to protecting the historic environment under the following headings:

- Overview: historic environment;
- Plan making: historic environment;
- Decision-taking: historic environment ;
- Designated heritage assets;
- Non-designated heritage assets;
- Heritage Consent Processes and;
- Consultation and notification requirements for heritage related applications.

Historic England's Planning Advice¹⁸

Good Practice Advice

¹⁷ Ministry of Housing, Communities & Local Government (2019). Revised National Planning Policy Framework. Online: www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment

¹⁸ Historic England, *The Planning System*, Online: historicengland.org.uk/advice/planning/planning-system

4.28 Historic England publish guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. This provides *‘information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the national Planning Practice Guide (PPG)’*.

4.29 These notes are:

- GPA 1: The Historic Environment in Local Plans (2015);
- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015);
- GPA 3: The Setting of Heritage Assets (2nd ed., 2017);
- GPA 4: Enabling development and heritage assets (2020).

Historic England Advice Notes

4.30 This set of 12 advice notes cover various planning topics in more detail and at a more practical level.¹⁹ The document most relevant to the proposed scheme is:

- HEAN 1 - Conservation Areas.

Conservation Principles, Policies and Guidance for the sustainable management of the historic environment

4.31 This document provides a comprehensive framework for the sustainable management of the historic environment and has been referred to in paragraph 3.14 above.²⁰

The London Plan

4.32 The new London Plan 2021 was adopted in March 2021.²¹

¹⁹ Historic England Advice Notes:
historicengland.org.uk/advice/planning/planning-system

²⁰ English Heritage (2008) *Conservation principles, policies and guidance for the sustainable management of the historic environment*.

- 4.33 Chapter 3 ‘Design’ deals with overarching themes in relation to design in the built environment and provides a range of policies concerning the design of new development in London.
- 4.34 Policy D3 ‘Optimising site capacity through the design-led approach’ requires that development proposals should
- ‘enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.’; and;*
- ‘respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.’*
- 4.35 Policy D4 ‘Delivering good design’ expounds upon the procedures which will be used to oversee this ambition.
- 4.36 Chapter 7 ‘Heritage and Culture’ contains the policies relevant to heritage assets. It defines ‘Heritage significance’ (para 7.1.7) as:
- ‘the archaeological, architectural, artistic or historic interest of a heritage asset. This may can be represented in many ways, in an asset’s visual attributes, such as - form, scale, materials, and architectural detail, design and setting, as well as through historic associations between people and a place, and, where relevant, the historic relationships between heritage assets.’ It goes on to say that ‘development that affects heritage assets and their settings should respond positively to the assets’ significance, local context and character to protect the contribution that settings make to the assets’ significance. In particular, consideration will need to be given to*

²¹ Mayor of London (2021) <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form’.

- 4.37 Policy HC1 Heritage Conservation and Growth says at Paragraph C 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. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

- 4.38 In terms of development proposals, the policy requires 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. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.”

London Borough of Richmond upon Thames Local Plan

- 4.39 The Richmond upon Thames Local Plan was adopted in July 2018.²²

- 4.40 Policy LP 1 Local Character and Design Quality says:

A. The Council will require all development to be of high architectural and urban design quality. The high quality

²² LB Richmond upon Thames, online:
www.richmond.gov.uk/services/planning/planning_policy/local_plan/local_plan_review

character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area. To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

- 1. Compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;*
- 2. Sustainable design and construction, including adaptability, subject to aesthetic considerations;*
- 3. Layout, siting and access, including making best use of land;*
- 4. Space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;*
- 5. Inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and*
- 6. Suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site. All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within a neighbourhood plan where applicable, and the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design.*

4.41 Policy LP 2 Building Heights required new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means:

'1. Require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;

2. Preserve and enhance the borough's heritage assets, their significance and their setting;

3. Respect the local context, and where possible enhance the character of an area, through appropriate:

- a. scale*
- b. height*
- c. mass*
- d. urban pattern*
- e. development grain*
- f. materials*
- g. streetscape*
- h. Roofscape and*
- i. wider townscape and landscape;*

4. Take account of climatic effects, including overshadowing, diversion of wind speeds, heat island and glare;

5. Refrain from using height to express and create local landmarks; and 6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.'

4.42 Policy LP 3 'Designated Heritage Asset' states that

‘the Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough.’ It requires that ‘the significance (including the settings) of the borough’s designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by [amongst other things] ‘the use of appropriate materials and techniques.’

4.43 Further, point C requires that:

‘all proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.’

4.44 Point E states that

‘The Council’s Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.’

4.45 Local Plan Policy LP4 (Non-Designated Heritage Assets) seeks to

‘preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit.’

4.46 Policy LP 5 Views and Vistas says that

‘The Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:

1. Protect the quality of the views and vistas as identified on the Policies Map, and demonstrate such through

computer-generated imagery (CGI) and visual impact assessments;

2. Resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;

3. Require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced;

4. Require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;

5. Seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;

6. Seek improvements to views within Conservation Areas, which:

a. are identified in Conservation Area Statements and Studies and Village Plans;

b. are within, into, and out of Conservation Areas;

c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings.'

London Borough of Richmond upon Thames Emerging Local Plan

- 4.47 The London Borough of Richmond upon Thames are preparing a new Local Plan. Consultation on the Regulation 18 version of the draft Local Plan took place between December 2021 and January 2022.
- 4.48 The new Policy 29 'Designated heritage assets', largely reflects the existing Local Plan policy provisions.

5 The proposed development and its effect

- 5.1 The proposed works are described in the drawings and other materials prepared by Ackroyd Lowrie that accompany this application. The proposal for the Site has been the subject of a number of pre-application meetings with the local authority and the design has been developed in response to that advice.

The need for the proposed works

- 5.2 The proposed new use for the building is for visitor accommodation which will provide care and physiotherapy-led rehabilitation facilities. With this aim in mind, accessibility arrangements for the building need to be of the highest standard for guests. In order to attain this level of accommodation, including obtaining usable floor-to-ceiling heights, substantial works would be required to the existing building in order to make these adaptations.

Summary of the proposals

- 5.3 The proposals for the Site comprise the demolition of all of the non-original extensions to the original building. The 1990s extension on Church Road will be replaced with a new build element wrapping around to Sydney Road which is designed to demonstrate a subservient and respectful relationship between the new element and the original building on Sheen Road. The Locally Listed buildings would be entirely retained. Minor internal alterations will improve the present configuration and appearance.
- 5.4 The rendering on the original part of the building will be reconfigured to a more appropriate design that is much more respectful to the original building and consistent with the style of similar properties in the conservation area. This treatment allows the proportions of the building to be experienced correctly as well as allowing

the subtle decorative elements of the string courses and window architraving to assert themselves. The distracting main entrance canopy will be removed and replaced by a less visually intrusive entrance treatment.

5.5 The new build extension on Church Road will be read as 3 distinct pavilions engendering a clear sense of the villa 'grain' common in the conservation area. The use of stock brick and subtle decorative elements of string courses, window architraving, the sparing use of render and slate roofs successfully tie the new building to the original main part. The shallow pitched roofs, characteristic of the conservation area, are set below the eaves level of the original main building creating a building that is subservient to the original Buildings of Townscape Merit. The recessed link between the original and the new build extension further help maintain this subservient relationship.

5.6 The Sydney Road entrance is clearly articulated making this part of the building much more readable than in its present form. The much improved boundary treatment and glimpsed views into the newly landscaped garden from Sydney Road, will greatly add to the setting of the conservation area.

The effect of the proposed works on heritage significance

5.7 The proposed works are sympathetic to the age and construction of the original parts of the Locally Listed Richmond Inn.

5.8 The building has experienced extensive change throughout its history; most clearly in the series of extensions which have been added to its rear as well as internal reconfigurations.

5.9 The proposed works will have only a positive effect upon the heritage significance of the Locally Listed building and will not affect its architectural or historic interest to a degree that would alter that interest but will certainly preserve it. The proposed works will not cause loss or

damage to any remaining original fabric but will safeguard the building's long-term sustainability, utility and appearance.

- 5.10 The result of the works will be to improve the overall appearance and utility of the property and in so doing will have a positive effect on the Sheen Road Conservation Area. There will be no effect upon the significance of any other heritage asset.

The level of 'harm' caused by the proposed scheme

- 5.11 The NPPF identifies two levels of potential 'harm' that might be caused to a heritage asset by a development: 'substantial harm...or total loss of significance' or 'less than substantial'. Both levels of harm must be caused to a *designated* heritage asset – in this instance the Sheen Road Conservation Area or the nearby listed buildings.
- 5.12 The proposed scheme does not lead to 'substantial' harm or any level of 'less than substantial' harm to the designated heritage assets in question. The proposal does very evidently not result in the 'total loss of significance' of any listed building or conservation area.
- 5.13 The cumulative effect of the improvements will be positive. The works will enhance and better reveal the significance of heritage assets and preserve those elements of setting that make a positive contribution to such assets, in accordance with the specific and wider aspirations of the NPPF.
- 5.14 Further, the scheme provides a tangible public benefit in the form of enhancement over the present situation thereby improving the Locally Listed building's long-term sustainability, utility and appearance.

6 Townscape, heritage and visual impact assessment

Introduction

- 6.1 This section of the report assesses four townscape views of the Site, analysing the as-existing situation and what is proposed.
- 6.2 The views are indicative views taken from a BIM model based upon an accurate survey of the existing building in conjunction with context modelled on the OS map.

The townscape views

- 6.3 A combination of desktop study and fieldwork has been used to determine the significant views of the proposed development by identifying potential lines of visibility and townscape effect both in long and closer views. The methodology employed is detailed in ‘Assessment methodology’ below.
- 6.4 Four townscape views were identified with which to test the effect of the Proposed Development. These views were discussed and agreed with the London Borough of Richmond upon Thames. The 4 view points are listed in Table 1 and illustrated in Figure 17.

Table 1 : View points

<i>View</i>	<i>Description</i>	<i>Wireline or Render</i>
1	From Church Road looking north	R
2	From south western junction of Sheen Road and Church Road looking north east	R
3	From outside No. 43 Sheen Road looking east	R
4	From outside 47-49 Church Road looking south east	R



Figure 17: Location of townscape viewing positions (site redline)

6.5 For each view, the existing situation is described and the proposed effect of the development is assessed.

6.6 The text below should be read in conjunction with the analysis contained in the previous and succeeding sections of this report.

Assessment methodology

6.7 An analysis of the area around the site has been undertaken to understand the impact the development is likely to have on key townscape features and heritage assets. This includes: urban form, character and architectural quality, the presence of heritage assets, scale and massing, public realm, permeability and linkages, continuity and enclosure.

6.8 This assessment has considered the existing physical fabric of the area, the character and settings of conservation areas and listed buildings in the vicinity, the appropriateness of the site for the proposed development, and the character of the proposed design. The assessment

of townscape and visual impacts describes how the proposed development will affect the elements that make up the townscape, the aesthetic and perceptual aspects of the townscape and its distinctive character and describes how the content and character of views may be affected.

- 6.9 Structured, informed and reasoned professional judgement has been used to take account of quantitative and qualitative factors. This is widely accepted as best practice and is based on an analysis of desk research and field assessment. It is recognised that the character of London is one of contrasts, of historic and modern buildings, and that modern buildings of high design quality do not necessarily harm the settings of historic assets.
- 6.10 The available guidance for assessing the impacts on townscape, heritage assets and visual amenity of a development is as follows:
- Guidelines for Landscape and Visual Impact Assessment ('GLVIA') (3rd ed.,2013) produced jointly by the Landscape Institute and the Institute of Environmental Management and Assessment;
 - London View Management Framework Supplementary Planning Guidance ('LVMF SPG') (2012); and
 - Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2015) produced by Historic England.
- 6.11 The GLVIA provides advice on good practice and is equally applicable to all forms of 'landscape', including urban townscape. The methodology employed for this assessment is based on approaches recommended in the GLVIA. However, the guidance states that its methodology is not prescriptive in that it does not provide a detailed universal methodology that can be followed in every situation (Paragraph 1.20); the assessment should be tailored to the particular circumstances in each case with an approach that is in proportion to the scale of the

project that is being assessed and the nature of its likely impacts. The guidance recognises that much of the assessment must rely on professional judgement (Paragraph 2.23-2.26). The GLVIA states that an assessment should in most cases clearly address both how the proposal will affect the elements that make up the aesthetic and perceptual aspects of the townscape and its distinctive character, and the content and character of views. In a dense urban setting, the landscape and visual assessments are intrinsically linked and impacts are primarily direct and visual; the modelling of representative illustrative views demonstrates the likely impacts on the local townscape character as well as on the composition and character of specific views. In this assessment the representative views have been used to consider:

- The impacts of the proposed development on the quality and character of the local townscape; and
- The visual impacts of the proposed development on the content and character of representative views.

Sensitivity Criteria

6.12 Existing townscape and heritage sensitivity is measured as follows:

Value	Criteria	Sensitivity to change
Exceptional	Strong townscape or landscape structure with distinctive features, exhibiting unity, richness and harmony, no detracting features, and a strong sense of place. Likely to be internationally or nationally recognised, e.g., a World Heritage Site, a group of Grade I listed buildings or a Grade I registered historic park or garden.	Very high
High	Strong townscape structure with	High

	distinctive features, strong sense of place, only occasional detracting features. The townscape is likely to be of importance at the county, borough or district level and contain features of national importance, e.g., a Grade II* or Grade II Registered historic park or garden, a conservation area containing a high proportion of listed buildings.	
Good	Recognisable townscape structure, some positive features, some detracting features, recognisable sense of place. May be a locally valued townscape, conservation area or contain groups of Grade II listed or locally listed buildings.	Medium
Average	Distinguishable townscape structure, some positive features, prominent detracting features.	Low
Low	Weak or disjointed townscape structure, frequent discordant and detracting features.	Very Low

Effect Criteria

6.13 The magnitude of change to townscape and heritage receptors is measured as follows:

None	No effect
Negligible	No material change
Minor	Changes that only make a small difference to the ability to understand and appreciate the historic context or townscape setting. A minor impact may also be defined as involving receptors of low sensitivity exposed to intrusion, obstruction or change of a low to medium magnitudes for short periods of time.
Moderate	A change that makes an appreciable difference

	to the ability to understand the historic context or townscape setting. A moderate impact may also be defined as the result of moderately sensitive receptors exposed to intrusion, obstruction or change of a medium magnitude, or highly sensitive receptors exposed to intrusion or change of a low magnitude.
Major	A fundamental change in the appreciation of the resource and historic context or townscape setting. A substantial impact may also be defined as the result of highly sensitive receptors exposed to intrusion, obstruction or change of a high or medium magnitude for prolonged periods

Significance of effect

- 6.14 These two measures – sensitivity of receptor and magnitude of change – are combined to provide a measure of the significance – major, moderate, minor or negligible – of the effect on townscape or views which will result from the Proposed Development.

	Sensitivity of Receptor		
Magnitude of change	High	Medium	Low/Very Low
Major	Major	Moderate to Major	Moderate
Moderate	Moderate to Major	Moderate	Minor to Moderate
Minor	Moderate	Minor to Moderate	Minor
Negligible	Negligible/Low	Negligible/Minor	Negligible

Quality of impact Criteria

- 6.15 The quality of the effect of proposals on townscape receptors is measured as follows:

Neutral	There is negligible or no impact
Beneficial	The impact of the development is to improve the condition or circumstances of the

	townscape receptor
Adverse	The impact of the development is to harm the condition or circumstances of the townscape receptor

View 1: From Church Road looking north towards the site
Existing



- 6.16 The view is within the Sheen Road Conservation Area.
- 6.17 The incongruous render treatment on the buildings fronting Sheen Road compromises the appearance of the Buildings of Townscape Merit by visually affecting their carefully designed original proportions.
- 6.18 The 1990s Church Road extension is subservient in height to the original building due to the sloping away of Church Road from Sheen Road. Its bay windows attempt to refer to the bays of the neighbouring properties however this is not a successful relationship given their height above street level at this point. The treatment of the boundary wall is weak and not supportive of the conservation area setting.

- 6.19 The value of townscape and heritage sensitivity in the view is assessed to be Good, with a Medium sensitivity to change.

Proposed



- 6.20 The revised treatment of the rendering on the original part of the building is appropriate and respectful to the original building and consistent with the style of similar properties in the conservation area. This treatment allows the proportions of the building to be experienced correctly and well as allowing the subtle decorative elements of the string courses and window architraving to assert themselves.
- 6.21 The rebuilt extension on Church Road allows this part of the building to sit back from the pavement and appear subservient to the original main parts. Its bay windows are set at the appropriate height in relation to street level and sit comfortably in the new built form. The sparing use of render further allows the extension to recede in the view and present a much more refined and ordered streetscape than at present. The revised treatment of the boundary wall is much more appropriate to its setting.

Assessment

- 6.22 This would be a change of Minor magnitude to a view of Medium sensitivity. The significance of effect would be Minor to Moderate. The quality of effect would be Beneficial.

View 2: south western junction of Sheen Road and Church Road looking north east towards the site

Existing



- 6.23 The view is within the Sheen Road Conservation Area.
- 6.24 Here the awkward relationship of the Buildings of Townscape Merit with the 1990s extension is clear. The idiosyncratic render application distorts the original proportions of the buildings of Townscape Merit creating an uncomfortably squat dimension to the upper floors and also makes for an awkward relationship with its neighbour at 58-60 Sheen Road. The blue hotel name sign at high level on the east flank wall is a distracting feature as are the incongruous design of the boundary wall and main entrance canopy.

6.25 The value of townscape and heritage sensitivity in the view is assessed to be Good, with a Medium sensitivity to change.

Proposed



- 6.26 This view reinforces the positive benefits described in respect of the previous view but also demonstrates how the proposed extension – which will be read as 3 distinct pavilions - will engender a clear sense of the villa ‘grain’ common in the conservation area. The treatment of the front elevations of the extension are complementary to and reflective of the original Buildings of Townscape Merit. The distracting canopy is removed.

Assessment

This would be a change of Moderate magnitude to a view of Medium sensitivity. The significance of effect would be Moderate. The quality of effect would be Beneficial.

View 3: From outside No. 43 Sheen Road looking east towards the site

Existing



- 6.27 The view is within the Sheen Road Conservation Area.
- 6.28 Here the relationship of the Site with the adjacent buildings in Sheen Road is clear. The 1990s rear extension is less visible than in closer views. The idiosyncratic render application distorts the original proportions of the buildings of Townscape Merit creating an uncomfortably squat dimension to the upper floors. The blue hotel name sign at high level on the east flank wall is a distracting feature.
- 6.29 The value of townscape and heritage sensitivity in the view is assessed to be Good, with a Medium sensitivity to change.

Proposed



- 6.30 This view reinforces the positive points already referred to above. The proposed extension has a comfortable relationship with the Buildings of Townscape Merit and although the link can be seen, the two masses still read as being separate allowing the new build element to maintain its subservience to the original main part.
- 6.31 The value of townscape and heritage sensitivity in the view is assessed to be Good, with a Medium sensitivity to change.

Assessment

- 6.32 This would be a change of Moderate magnitude to a view of Medium sensitivity. The significance of effect would be Moderate. The quality of effect would be Beneficial.

View 4: From outside 47-49 Church Road looking south east towards the site

Existing



- 6.33 The view is within the Sheen Road Conservation Area.
- 6.34 The view takes in the Church Road and Sydney Street elevation of the Site – comprising the 1996 extension to the main building.
- 6.35 The hanging bay windows at the first floor level are incongruous and an unsuccessful rendering of a traditional Victorian feature. The solid boundary treatment onto Church Road is overly defensive for a property in this type of situation. The building overall, when viewed from this direction, is incoherent and closed-off.
- 6.36 The value of townscape and heritage sensitivity in the view is assessed to be Average, with a Low sensitivity to change.

Proposed



- 6.37 The new build extension along Church Road and Sydney Road allows for floor levels to be set down and the shallow pitched roofs, characteristic of the conservation area, are set below the eaves level of the original main building creating an extension that is subservient to the Buildings of Townscape Merit. The recessed link between the two further helps maintain this subservient relationship.
- 6.38 The new extension will be read as distinct pavilions, successfully breaking up its mass and referencing the locally common villa form. The Sydney Road entrance is clearly articulated.
- 6.39 The use of stock brick and subtle decorative elements of string courses, window architraving and slate roofs successfully tie the new building to the original main part and to its surrounding context. The much improved boundary treatment – where railings are introduced along Church Road - is worthy of its conservation area setting.

Assessment

- 6.40 This would be a change of Moderate magnitude to a view of Low sensitivity. The significance of effect would be Minor to Moderate. The quality of effect would be Beneficial.

7 Compliance with policy and guidance

7.1 This report has provided a detailed description and analysis of the heritage significance the Site and its heritage context and has described how the Proposed Development will affect that heritage significance. We have concluded that any effects on heritage assets are positive, and accordingly, that the Proposed Development complies with applicable policy and guidance in relation to heritage matters.

7.2 This section should be read with Section 4 which sets out the relevant statutory, policy and guidance context.

The Planning (Listed Buildings and Conservation Areas) Act 1990

7.3 The conclusion of our assessment, contained in previous sections in this report, is that the Proposed Development would not cause harm to listed buildings or their settings and would both preserve and enhance the character and appearance of the Sheen Road Conservation Area. The Proposed Development thus accords with the objectives in Sections 66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

7.4 It is important to note that the legal requirement regarding satisfying Section 72(1) of the Act was established by *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573 and is met if the proposed development leaves conservation areas unharmed. We believe that it would be difficult to characterise the proposal as doing anything less than leaving the Sheen Road Conservation Area unharmed.

The National Planning Policy Framework

7.5 Section 4 sets out the relevant paragraphs of the National Planning Policy Framework.

Design

7.6 The proposed scheme is wholly consistent with Chapter 12 of the NPPF 'Achieving well-designed places'. It is a good example of a design which '*will function well and add to the overall quality of the area*' and be '*sympathetic to local character and history, including the surrounding built environment*' as sought by Paragraph 130 of the NPPF.

The level and nature of 'harm' caused by the proposed development

7.7 We have noted that the NPPF identifies two levels of potential harm to designated heritage assets: 'substantial harm...or total loss of significance' or 'less than substantial' where harm is caused to a designated heritage asset. No distinction in terms of a level of harm is applied to non-designated heritage assets.

7.8 The Proposed Development does not result in any harm to or loss of significance of any heritage asset and preserves and enhances the heritage assets in question. It would not lead to any degree of harm identified in the NPPF.

7.9 The only potential for 'substantial' harm would be if the Proposed Development caused the loss of a significant component of the special interest of any listed building or other designated heritage asset. There is nothing about the proposal that would give rise to this level of harm.

7.10 We do not believe that the scheme involves any 'less than substantial harm to the significance of a designated heritage asset'.

7.11 It is further considered that the Proposed Development will enhance and better reveal the significance of heritage assets – in particular the Sheen Road Conservation Area - and preserve those elements of the setting that make a positive contribution to such assets, in accordance with Paragraph 206 of the NPPF.

Specific requirements of the NPPF in respect of heritage assets

- 7.12 This report has described and analysed the significance of the site and its heritage context, as required by Paragraph 194 of the National Planning Policy Framework.
- 7.13 The proposal complies with Paragraph 199 of the NPPF in that it conserves the heritage assets affected. Special architectural or historic interest is preserved and no harm to heritage significance is caused. Paragraphs 200, 201 and 202 of the National Planning Policy Framework are therefore not engaged in consideration of the proposal.
- 7.14 This report concludes that there will be no ‘harm or loss’ to the significance of the non-designated heritage asset – the Site - as per Paragraph 203.

Historic England guidance on the setting of heritage assets

- 7.15 In completing our assessment, we have followed the step-by-step methodology provided in Historic England’s Historic Environment Good Practice Advice in Planning Note 3 which is addressed as follows:
- Step 1: identify which heritage assets and their settings are affected:
This is done in Sections 2 and 3 of this report.
 - Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s):
This is discussed in Section 3.
 - Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance:
This is undertaken in Section 5 of this report.
 - Step 4: explore the way to maximise enhancement and avoid or minimise harm:
This formed part of the design process and pre-application discussions with the local planning authority, and the design has evolved to respond to pre-application advice.

- Step 5: make and document the decision and monitor outcomes:
The submission documents, in particular the Design & Access Statement and this report, record the scheme as amended following design development prior to and during an application for planning permission being made.

London Plan 2021

- 7.16 The proposed scheme is consistent with the London Plan and fully complies with its Design (Chapter 3) and Heritage (Chapter 7) policies.
- 7.17 The proposed scheme is of the highest architectural quality and responds to Policy D3 *'Optimising site capacity through the design-led approach'* by *'positively responding to local distinctiveness and successfully responding to the existing character of the place and in that respects, enhances and utilises the heritage assets and architectural features that contribute towards the local character.'*
- 7.18 It is also consistent with Policy HC1 Heritage Conservation and Growth in that the applicants have sought to identify, understand and conserve the historic environment and the proposals clearly conserve the significance of nearby heritage assets, and their settings, by being *'sympathetic to their significance and appreciation within their surroundings'*.

London Borough of Richmond upon Thames Local Plan

- 7.19 In positively addressing the requirements of the National Planning Policy Framework, the works also meet the policy requirements of the London Borough of Richmond upon Thames Local Plan relevant to preserving heritage assets. Its contextual design is sensitive to its surroundings, improving the quality and character of the building on the site as required by Policy LP 1 Local Character and Design Quality and, in particular, the

proposal will preserve the character or the appearance of the Sheen Road Conservation Area.

- 7.20 In ensuring that the proposals are appropriate and respectful to the building's context, the setting and significance of the non-designated heritage asset on the Site as well as nearby designated heritage assets are preserved as required by Policy LP 2 Building Heights, Policy LP 3 Designated Heritage Assets, Policy LP4 Non-Designated Heritage Assets and Policy LP 5 Views and Vistas.

8 Summary and conclusion

- 8.1 Richmond Inn comprises of two conjoined Buildings of Townscape Merit, located in the Sheen Road Conservation Area in the London Borough of Richmond upon Thames.
- 8.2 Full planning permission is sought for the partial demolition and extension of Richmond Inn for Class C2 visitor accommodation providing care and physiotherapy-led rehabilitation, highways works, car and cycle parking, refuse storage, landscaping and other associated works.
- 8.3 The purpose of this report is to consider how the proposed works address the statutory requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and to assess those works against national and local policies and guidance relating to the historic built environment.
- 8.4 Our conclusion is that if the proposed works are consistent with the urban design and heritage policies of the National Planning Policy Framework, the London Plan and the London Borough of Richmond upon Thames Local Plan.
- 8.5 The proposed works respond appropriately and contextually to the surrounding townscape and will have only a positive effect upon that townscape and the surrounding designated and non-designated heritage assets.
- 8.6 The proposed works fully respect the characteristics of the Buildings of Townscape Merit, insofar as they are connected to architectural and historic interest. The works will not affect that architectural or historic interest to a degree that would alter it in any significant way and will certainly preserve that interest.
- 8.7 Similarly, the works will preserve the special architectural or historic interest of nearby designated heritage assets - either directly, in the case of the Sheen Road Conservation

Area which will be enhanced by the proposal, or indirectly in regard to the setting of nearby listed buildings, by not having any effect - and it therefore complies with S.16, S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 8.8 For these reasons, the proposed scheme will comply with the law, and national and local policies and guidance for urban design and the historic built environment.

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