



# Heritage Impact Assessment

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Meadows Hall,  
Church Road, LB  
Richmond-upon-  
Thames

May 2022 | Project Ref 7300A

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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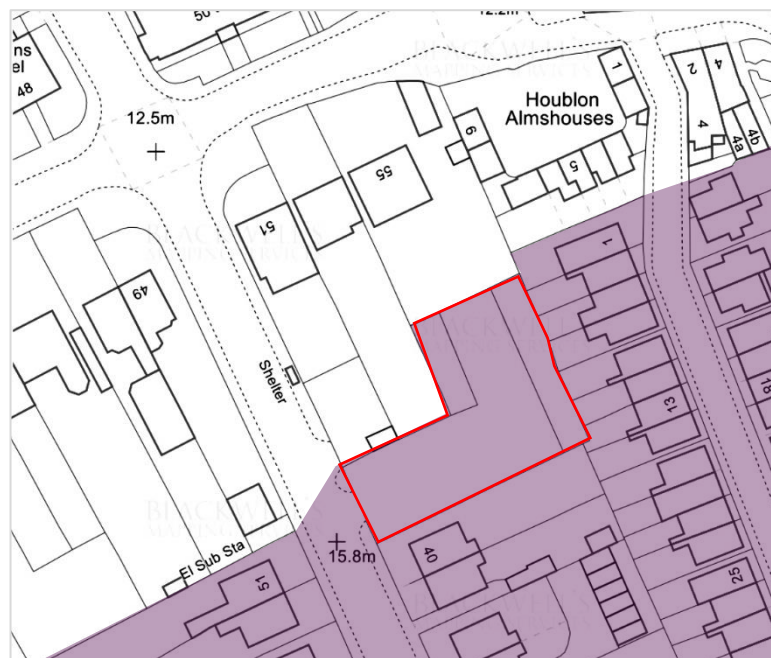
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# 1. Introduction

**1.1** This Heritage Statement has been prepared by HCUK Group on behalf of RHP Develop Let. It relates to a parcel of land formerly the Meadows Hall Community Centre off Church Road in the London Borough of Richmond upon Thames, TW10 6LN. It considers heritage assets relevant to the development of the site in order to inform decision makers at Richmond Borough Council (RBC) on such matters to aid determination of an application affecting the site.

**1.2** The site has no buildings on it at present, but it is within the St Matthias Conservation Area. In addition, the Houblon Almshouses are located to the north of the site and other buildings within the vicinity are considered to be positive contributors within the area. The Sheen Road conservation area is located directly to the north.



*Figure 1: Site Location including the location of the listed Houblon Almshouses to the north and the boundary division between the St Matthias Conservation Area shaded and Sheen Road Conservation Area unshaded to the north.*

## The Context

- 1.3** This report accompanies a planning application for the redevelopment of the Meadows Hall site with a block of mews type houses to the rear and a single mansion block addressing the Church Road frontage. The whole development is to be offered on an affordable basis with 8 of the 14 units offered to people with a learning disability, the scheme has been designed in consultation with the Learning Disability Team at the LBR.
- 1.4** Pre-application consultation was undertaken in September 2020 (ref: 20/P0413/PREAPP), January 2021 (ref: - 20/P0413/PREAPP) and a design review panel process was undertaken in August 2021. The design team at Wimshurst Pelleriti Architects have summarised the results of these reviews in the application Design and Access Statement and the feedback has directly resulted in the scheme presented here. HCUK Group provided further heritage advice and input on the surrounding historic context feeding in to final refinements to the design.
- 1.5** Final revisions to the scheme removed a single unit from the rear mews properties to reflect protected trees in the vicinity.

## Purpose of this Statement

- 1.6** This report presents proportionate information on the heritage significance of relevant assets in order to inform local decision takers. It considers assets' heritage values in the terms set out within the NPPF and then considers the impacts that may arise from the proposed development on those assets. This report should be read alongside architectural drawings by Wimshurst Pelleriti. The key consideration is whether or not the proposals cause harm to any asset through eroding its heritage values and significance.
- 1.7** This report has been informed by a site visit and background research. Below ground archaeological potential is outside the scope of this report.

## 2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.<sup>1</sup>
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.<sup>2</sup> Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.<sup>3</sup>
- 2.4** 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.
- 2.5** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF 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.*
- 2.6** Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017),

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<sup>1</sup> 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.

<sup>2</sup> South Lakeland v SSE [1992] 2 AC 141.

<sup>3</sup> Conservation Principles, 2008, paragraph 84.

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 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.

**2.7** The NPPF requires the impact on the significance of a designated heritage asset<sup>4</sup> 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.<sup>5</sup> The Scale of Harm is tabulated at Appendix 1.

**2.8** 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.<sup>6</sup> 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.*

**2.9** 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.

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<sup>4</sup> 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.

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

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



**2.10** 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 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.*

**2.11** Paragraph 203 of the NPPF is relevant to the adjacent properties on Church Road all of which are included on the London Borough of Richmond's local list, the closest pair is no.42 immediately south of the site with no.51 on the opposite side of the road.

**2.12** The London borough of Richmond upon Thames adopted their local plan in July 2018. Policy LP1 seeks to ensure a high quality of design that is sensitive to the local heritage context enhancing it where possible. Policy LP3 relates to designated heritage assets including conservation areas and in Part C development within a conservation area is required to preserve and if possible, enhance their character and appearance. Policy LP4 relates to non-designated assets – including buildings of townscape merit. Non designated heritage assets are also covered by a supplementary planning document (adopted in May 2015).

## 3. Background and Development

### Understanding the Site

**3.1** Meadows Hall was until recent demolition a community day centre on the east side of Church Road, Richmond. The site has remained empty since demolition in 2018 but contained a long low flat roofed structure. Today the site comprises areas of hardstanding with overgrown informal bramble and self-sown plants.



*Figure 2. The hoarding at the entrance to the site with no.42 Church Road on the right.*



*Figure 3: The site area looking north west toward the rear of buildings on the Sheen Road*



*Figure 4: The site looking towards the entrance and Church Road properties*

### 3.2

The earliest available map is the 1849 Richmond Parish Tithe Map. The area is very rural at this time, but buildings are developing along the Sheen Road and the Houblon Almshouses are clearly identifiable as three separate blocks fronting the road to the north. Church Road is not constructed or laid out and the land, Plot No.

34, on which Church Road was later built was meadow land, owned by William Selwyn and occupied by John Jeams (Figure 5).<sup>7</sup>

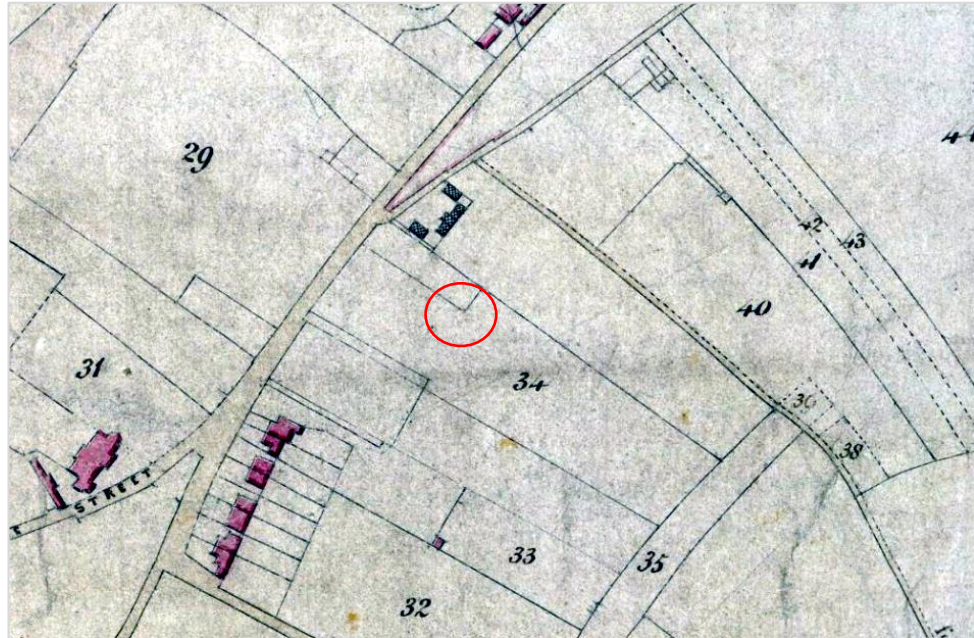


Figure 5. 1849. Richmond Parish Tithe Map. The approximate location of the site is circled

### 3.3

Houblon Almshouses, which are grade II\* listed,<sup>8</sup> were established for the accommodation of nine poor women by sisters Rebecca and Susannah Houblon in 1758. An inscription on the pediment above the entrance records: *'These almshouses were erected and endowed by Mrs Rebecca and Mrs Susannah Houblon MDCCLVIII'*.<sup>9</sup> Rebecca and Susannah were the daughters of Sir John and Lady Houblon, descendants of a Huguenot family who fled to London in c.1567. Sir John became the first Governor of the Bank of England (1694) and Mayor of London (1696). His widow and daughters moved to live in Ellerker House on Richmond Hill in 1712.<sup>10</sup> The almshouses were enlarged in 1857 to provide two additional units, but reduced again to nine in the 1960s, to accommodate bathrooms and internal restructuring.<sup>11</sup>

<sup>7</sup> National Archives IR 29/34/104.

<sup>8</sup> Historic England List Entry No. 1253033.

<sup>9</sup> Richards 2018; <https://www.richmondcharities.org.uk/our-almshouses/houblons-almshouses>

<sup>10</sup> [https://www.richmond.gov.uk/media/6312/local\\_history\\_almshouses.pdf](https://www.richmond.gov.uk/media/6312/local_history_almshouses.pdf)

<sup>11</sup> <https://www.richmondcharities.org.uk/our-almshouses/houblons-almshouses>



Figure 6. Houblon's Almshouses © Richards 2018



Figure 7. 1871. Ordnance Survey 1st Edition 6-inch scale (surveyed 1867-8)

### 3.4

By the time the 1871 Ordnance Survey 6-inch scale map was surveyed, 20 years later (1867-8), houses had been built on either side of Sheen Road with a short lane running between the current Nos. 51 and 49. By 1891-4 this lane had been

widened and extended to form Church Road, with pairs of villas built on either side (Figure 5) leading to the Church of St Matthias, which had been built in 1857-62 to the design of Sir George Gilbert Scott. The Church Road frontage to the north of No. 40 on which Meadows Hall was built, was vacant at this date, whilst the northern part of its L-shaped plot was occupied by the rear garden of No. 55 Sheen Road. It would seem likely that the site's church road plot was intended for another pair of villas but none was ever built, no reason for this has been discovered.



Figure 8. 1898. Ordnance Survey 2nd Edition 25-inch scale map (revised 1891-4)

### 3.5

Meadows Hall Old Peoples' Centre opened in 1963, and was named after the then mayor of Richmond, Councillor A.B. Meadows., who was responsible for its creation, alongside Alderman A.C. McDougall. The centre was taken over by Age Concern in 1999. Richmond Archives hold a collection of material dated c.1960-c.1985 including photographs, negatives, newspaper cuttings, a copy of 'Meadows Hall 1963-1973', and annual reports (1964-79) etc.<sup>12</sup>

<sup>12</sup> Ref. No. DC51; Record No. 8199175. The collection is currently being catalogued and stored offsite.

## 4. Statement of Significance

### Assessment of Significance

**4.1** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance. The identification of the heritage assets equates to Step 1 of GPA3, 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) and with the tabular methodology at Appendix 2.

### St Matthias Conservation Area

**4.2** This conservation area has an adopted appraisal document in conjunction with the adjacent Sheen Road Conservation Area. In brief its significance is identified as a coherent area developed primarily from the mid-19<sup>th</sup> century along three main roads centred on St Matthias' Church with smaller paths and cross streets.

**4.3** A strong sense of cohesiveness to the architectural styles is highlighted though difference between building types is noted from smaller two storey terraces with high historic integrity on Houblon Road to the larger villa properties and three storey 'grandeur' of Montague Road.

**4.4** The predominant domestic character of the area is a key strand of illustrative historic interest reflecting the growth of this part of London after the arrival of the London and South Western railway at Richmond in 1857.

**4.5** Church Road is a long straight road with strongly consistent pairs of villas along both sides of the road. They were developed in a single phase at the end of the 19<sup>th</sup> century. Key characteristics of these pairs are a consistent stock brick construction with stone or rendered details, canted bay windows at lower ground and upper ground floor, elevated entrance doors with steps and arched openings (east side of the road) or shallow flat roofed porches (west side of the road), red brick details at quoins and window jambs, shallow slated roofs with end set chimneys and overhanging eaves.



*Figure 9 (left) typical pair from the eastern side of the road with arched door openings; Figure 10 (right): typical pair from the western side of Church Road with shallow flat roofed porches.*

## 4.6

The villa buildings are set back slightly from the pavement behind low brick walls with piers at pedestrian gateways. It's likely that the boundary walls once had railings but these are little in evidence today on the road though low hedges sometimes define the boundaries along with a few trees. Church Road is broad and there are long views along its length where the regular rhythm of the villa blocks is a clear feature.



*Figure 11: view along Church Road with regular villa blocks defining the sides of the wide street.*



- 4.7** The site's role in the conservation area is picked out as negative within the appraisal character document. The then day care building was summarised as a squat building with poorly defined frontage that did not conform to the prevalent building line. It is now an empty over grown gap within the street scene that disrupts the consistency of the street's rhythm.

## Houblon Almshouses

- 4.8** The alms houses are a grade II\* listed building reflecting their national significance. The list description provides a succinct description of their external appearance as follows:

*"1757-1758. A range of three 2-storey blocks of buildings around 3 sides of a square. Tiled roofs. Brown brick with brick eaves cornice. Brick band at first floor level. Two-light sash windows under segmental arches. Doors also segmental arches, with gabled porches on brackets. Pedimented entrance bay carries inscription: "These almshouses were erected and endowed by Mrs Rebecca and Mrs Susannah Houblon 1758".*

- 4.9** As a mid 18<sup>th</sup> century survival of a specific building type these almshouses have architectural values embodied in their symmetrical appearance and surviving historic fabric as well as the clearly defined walled boundary and gates to the road. Their elevational details included the segmented archways, brick storey bands and pedimented door hoods that echo the main pedimented roof form are all characteristic 18<sup>th</sup> century features that reinforce the legibility of this period's architecture and represent some of the earliest structural survivals within this area. The building has a single coherent architectural aesthetic that connects and unifies the individual units provided in these almshouses.



*Figure 12: Houblon Almshouses within its walled enclosure from the Sheen Road*

- 4.10** The building has clear historic interest and value pertaining to an illustration of the provision of charity for certain needy individuals in the past, in this case poor protestant women in need. The individual benefactors who established these almshouses are recorded in the plaque on the front of the building. There is contextual historic interest provided in historic links to other almshouses within the wider area – this conservation area also includes Hickeys Almshouses a short distance to the north east also fronting Sheen Road.
- 4.11** The site, although close, enables no meaningful opportunities to understand or experience this listed building. The alignment of its composite blocks, the focus of its front facades are all towards the private courtyard to the north and access to the main road. The building’s courtyard and other private curtilage areas are important in providing a sense of the historic enclosure and private spaces associated with these dwellings and after that the main road passing to the north and the historic gateway is an important area of setting. The site is an area of land, along with all of church Road developed some 100 years after the almshouses were established and having a markedly different character reflecting the wider development of the area. The site makes no specific contribution to the special interest of these buildings and although it is close it is considered to be an entirely neutral aspect of the wider urban setting that has developed around this listed building in the succeeding eras.

## Locally listed buildings on Church Road

- 4.12** The large villa properties on Church Road are all identified within the conservation area appraisal as buildings of local merit. They have a strong degree of architectural consistency with shared materials and elements of detailing that survive well across the street and provide a clear architectural coherence.
- 4.13** These buildings all provide historic illustration of planned development and expansion of this part of London in the years after the arrival of the railway facilitated an influx of the growing middle classes desiring leafy suburban housing outside the city's core. Their shared aesthetic illustrates the developing pattern book type approach to mass housebuilding of this era.
- 4.14** The site is an open area which makes no contribution to the local interest of these buildings other than as a negative element in the current over grown and detracting character as a blank and derelict site. The historic reason why this site was not developed as the rest of Church Road is not known. It is a noticeable 'gap' in an otherwise very regular and consistent street scape.

## 5. Heritage Impact Assessment

**5.1** 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. It equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment in Appendix 2.

**5.2** The proposals presented here have been developed following an understanding of the local context and history as well as through an iterative process with the London Borough of Richmond through pre-application consultation and through a design review panel process. The provision of housing units here is to be 100% affordable with 8 units provided specifically for tenants with special needs.

### Proposals

#### *Mews block*

**5.3** On the former day centre site a series of five units in a single row is proposed. The dwellings are small and consistent in their appearance with buff brick walls detailed through textured brick treatment and low sloped roof with pronounced eaves detail over a front façade with slightly recessed entrances. The design evolution has ensured both areas of private amenity space as well as a sense of communal shared space between this block and the front villa block described in paras.5.5 onwards. There is a clear sense of evoking the mews cottage or indeed almshouse tradition in this block which has a relatively simple façade treatment with shared characteristics across the five units. A positive degree of open space is retained around the block, preserving key trees and a sense of spacious 'garden' to the back part of the site.

**5.4** The block is carefully designed to respect the material qualities and prevalent palette of the surrounding area as well as the on site precedent for built form in a single range within the former footprint of the day centre. Though the former day centre was highlighted as a detracting structure within the conservation area the proposal here is a far more sensitively designed structure the provides a positive

response to this back land site within the conservation area. It will not erode architectural values within the conservation area but will add a new positive strand of architectural response and next layer of history reflecting the provision of housing for particular needs groups within the borough. In the past the lack of a street frontage was seen as a negative feature of this site. This proposal will see a carefully detailed element added to the street frontage respecting the scale, spacing and nature of the existing built forms and the mews block sitting well back within a sheltered and generally screened situation. For this reason the proposals' rear element will blend into the background and not detract from the character of the area.

#### *Villa block*

**5.5** At the front of the site it is proposed to construct a mansion style block that is directly inspired by the large 19<sup>th</sup> century villa blocks on Church Road. Again the dwellings proposed will be 100% affordable. The site enables a block to be constructed that respects the building line and spacing of the existing villas so that the strong consistency of street scene can be preserved.

**5.6** The architecture of this block has been directly inspired by the Victorian villas elsewhere on the road but does not seek to provide a rigid 'copy' of those villas but to create a sensitive and clearly modern response that will allow the historic architecture to remain entirely legible alongside this modern insertion. The proposed villa does this in the following ways:

- Overall the form and scale of the villa is closely matched to the historic buildings, including the roof form and the provision of chimneys.
- Double height canted bays are provided with a slightly simpler detailing of cornice instead of shallow roofs.
- The materiality within the street of buff brick is maintained and a strong boundary treatment with low walls and pedestrian gateways to secure the consistency of the street scene at this end of the road
- Instead of copying the modest red brick details on the historic villas accentuation is provided in projecting brick details. These will form a 'rusticated' lower ground floor level and storey bands that wrap around the building and tie front, side and rear elevations together.

- The lowered ground level enables a disability friendly level access to be achieved. Without front steps, the entrance is accentuated using a slightly projecting porch, influenced by those on the western side of Church Road, and the use of arched openings at the doorways replicating the language of entrances on this side of Church Road. The simple parapet above the porch provides some emphasis to the first floor in common with the language of the rest of the street.

**5.7** The proposed block does not detract or erode architectural or historic values within the conservation area, or of the buildings of local merit on Church Road. It responds sensitively to the architectural language and materiality of the surrounding area to offer a new intervention of high quality capable of becoming a positive element in future periods. In presenting a carefully detailed modern interpretation of the Victorian villa block the historic narrative of the street is preserved with new addition understandable as such but not being discordant or overly contrasting alongside the historic buildings. The language of entrances within Church Road has been borrowed to inspire the arched openings and slight porch that accentuates the central bay and point of access whilst securing an easily accessible building for the sensitive community of future users.

**5.8** The site's history as a community centre was not reflected in a high quality architectural form, but the proposed affordable and disability friendly scheme offers a sensitive and sympathetic architectural response in line with the historic narrative of the community purpose of this site as well as the wider historic context of almshouses over time which is reflected in both Houblon and Hickey Almshouses located close by.

## Effect on the St Matthias Conservation Area

**5.9** The proposals will see the development of a currently detracting empty site with two very carefully designed blocks that will preserve and indeed enhance the architectural quality, character and appearance of the conservation area.

**5.10** The proposed mews houses will sit back into the currently empty site and be subservient in scale and form to the surrounding area and buildings. The villa block has been carefully designed to respect the forms of the Church Street buildings whilst not diluting their historic architecture and to offer a modern response to

materials, detailing and form that is sensitive to the historic context. The language of 'entrances' on the road has been used to provide a degree of accentuation to the front doors whilst still facilitating level and accessible entrances at street level and without simply 'copying' the Victorian details. The provision of chimneys and fenestration to the northern elevation ensures a degree of visual interest on entrance to the street where this block will be one of the first approached.

## Effect on Houblon Almshouses

**5.11** There will be no harm caused to the special interest or significance of the Houblon Almshouses from either the mews or the villa block proposed. Houblon Almshouses face away from the site and have the strongest and most important relationship to the immediate enclosed setting of the private courtyard enclosed on the north side of the listed building. There will be no erosion of any means to see or understand the historic almshouses their form, key architectural details or the legibility of their history since the mid 18<sup>th</sup> century. The proposed blocks will not visually intrude into any means to see or experience the buildings, and if they might be slightly visible in outward views from the buildings themselves this is in common with a variety of buildings developed over the course of the 19<sup>th</sup> century and reflects the ongoing development of this area over time as is already the case.

**5.12** No harm is identified to this listed building from the proposals presented.

## Effect on buildings of local merit

**5.13** In common with the conservation area the villa block's careful design seeks to ensure the local interest of the large villa properties on Church Road is entirely preserved along with the character of their setting. The carefully detailed modern interpretation of a Victorian villa form does not seek to copy the historic buildings and thus allows their architectural values to be entirely understandable. The matched form and scale carefully preserves the general character of the street scene and their setting, in particular it does not intrude into the long views along Church Road where these properties are understood as a group reflecting a single period of development in the later 19<sup>th</sup> century.

**5.14** The local interest of these buildings will be preserved by the proposals.

## 6. Conclusions

- 6.1** The former Meadows Hall day centre was developed on a site at the northern end of Church Road Richmond in 1963 and ran until it was demolished in 2018. It was never considered a positive element of the surrounding conservation area which reflects most specifically the later 19<sup>th</sup> century development of this area following the arrival of the Railway at Richmond in 1856.
- 6.2** The proposals presented for determination are for the redevelopment of the site with a row of five mews type dwellings on the footprint of the former day centre, and the provision of 8 further units within a front villa property designed carefully to present a modern interpretation of the Victorian villas that define the rest of Church Road.
- 6.3** The designs have developed with a careful understanding of the history of the area, the material qualities and built forms in the area and the character and appearance of the conservation area both on this specific road and the wider area. Pre-application consultation and design review panel processes have been undertaken to understand officer's opinions and ensure a sensitive approach.
- 6.4** This report has presented proportionate assessments of the heritage assets in the vicinity and the site's role, if any, in contributing to their significance through falling within their setting and the character and appearance of the conservation area. The carefully designed scheme is found to preserve and enhance the character and appearance of the conservation area and to cause no harm to the significance of designated assets in the form of the nearby listed almshouses or the local assets of other properties on Church Road.
- 6.5** As no harm is identified paragraphs 201-203 of the NPPF are not engaged. There is considered to be preservation for the purposes of the decision makers' duty under sections 72 and 66 of the Act. In offering a sensitive and well designed response to the specific heritage characteristics of the site on Church Road the scheme offers a positive new intervention within the historic location and can be supported from a heritage perspective.



# Appendix 1

## *Scale of Harm (HCUK, 2019)*

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).<sup>13</sup>

<b>Scale of Harm</b>	
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

<sup>13</sup> 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.

## Appendix 2

### *GPA3 Assessment: Historic England’s guidance on setting*

In assessing the effect of the proposals on the setting and significance of designated and non-designated heritage assets (Houblon Almshouses and the local buildings of merit on Church Road), it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

<b><i>Relevant Considerations</i></b>	<b>Houblon Almshouses</b>
<i>Proximity of the development to the asset</i>	c.50 m to the south west of the almshouses
<i>Proximity in relation to topography and watercourses</i>	At a slightly lower ground level respecting the general falling topography from south to north. Water courses not relevant
<i>Position of development in relation to key views</i>	Key views are directly towards the almshouses from the main Sheen Road to the their north. The proposals will not intrude into this view in any way.
<i>Orientation of the development</i>	To Church Road as is appropriate for a development on this site. The Almshouses face a different direction and to a different street, Sheen Road. The mews part of the proposals relate to the site and towards Church Road as well though will not have an on street presence.
<i>Prominence, dominance and conspicuousness</i>	In relation to the listed building there will be no prominence or conspicuousness. The lower level of the mews houses element will ensure that this back land element of the proposals retains subservience to the surrounding built context including this listed building.
<i>Competition with or distraction from the asset</i>	None
<i>Dimensions, scale, massing, proportions</i>	Appropriate for the rear back land site area and the scale on Church Road.
<i>Visual permeability</i>	Not relevant.

<i>Materials and design</i>	Appropriate for the overarching material palette on Church Road and in keeping with the character of the historic almshouses in respect of the brick mews block.
<i>Diurnal or seasonal change</i>	Not relevant
<i>Change to built surroundings and spaces</i>	A derelict former community centre site will be redeveloped, including the frontage area to Church Road but within an urban context where the land is exclusively developed and this is part of the established character.
<i>Change to skyline, silhouette</i>	None, scale is such that the skyline role of the low level almshouses will not be affected, the taller element to Church Road will not affect the skyline of the almshouses being at a further distance and different alignment.
<i>Change to general character</i>	A positive change in the redevelopment of a currently conspicuous and derelict gap site within the wider townscape.

**Relevant Considerations**

**Local buildings of Merit on Church Road**

<i>Proximity of the development to the asset</i>	Immediately adjacent to the south, across the road and extending southwards up Church Road all buildings are identified as being of local heritage interest.
<i>Proximity in relation to topography and watercourses</i>	The site occupies the lowest topographical end of Church Road where all adjacent historic development is at a slightly higher level rising with the hill.
<i>Position of development in relation to key views</i>	Key views are along the broad and spacious Church Road where the regular layout into villa properties is clearly appreciable. The proposal replicates the spacing of the extant development and does not intrude further forward than the established building line.
<i>Orientation of the development</i>	To Church Road as is appropriate for a development on this site and matching the existing development. The mews element is set back but still addresses Church Road, though the front elevations of this element will have no street presence.
<i>Prominence, dominance and conspicuousness</i>	The scheme offers a modern interpretation of the prevailing buildings in form, materials and aesthetic. It will sit comfortably alongside the historic buildings and not be more prominent than

	them, while also seeking not to be a 'copy' that might dilute or lessen the historic evidence of the actual Victorian buildings.
<i>Competition with or distraction from the asset</i>	None through careful design and matched material palette.
<i>Dimensions, scale, massing, proportions</i>	To match the existing villa blocks and their spacing and with a much smaller, lower and subservient mews block to the rear.
<i>Visual permeability</i>	Not relevant. The villa block will increase the built solid form on the road but not prevent or obscure visibility of any of the existing buildings or their key details.
<i>Materials and design</i>	Appropriate for the overarching material palette on Church Road and with a sensitive modern interpretation of the Victorian dwellings utilising brick detailing and the language of the entrances while not slavishly replicating the Victorian buildings.
<i>Diurnal or seasonal change</i>	Not relevant
<i>Change to built surroundings and spaces</i>	A derelict former community centre site will be redeveloped, including the frontage area to Church Road but within an urban context where the land is exclusively developed and this is part of the established character. The current site could logically have been built out in the 19 <sup>th</sup> century as part of the original development, the proposals do not disrupt this narrative or the local interest of the street as a planned road.
<i>Change to skyline, silhouette</i>	None, the proposals continue the street scene very closely including the roof and eaves line and including features such as chimneys.
<i>Change to general character</i>	A positive change in the redevelopment of a currently conspicuous and derelict gap site within the wider townscape.

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