

**115-117 Kew Road, Richmond, TW9 2PN**

Proposed reversion of use from commercial proprietary club to a public house

3 May 2023



**BIDWELLS**

**HERITAGE STATEMENT**  
**PROPOSED REVERSION TO PUBLIC**  
**HOUSE USE**

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# Heritage Statement

1. This Heritage Statement has been prepared to accompany a planning application for a proposed reversion of use from commercial proprietary club to a public house at The Hope, 115-117 Kew Road, Richmond, TW9 2PN.

## Site Analysis

2. The application site comprises an existing and established commercial proprietary club and former longstanding public house. The property is recorded as a Building of Townscape Merit and lies within the Kew Foot Road Conservation Area.
3. Kew Foot Road Conservation Area was designated in September 1982 and lies between the eastern boundary of the Old Deer Park, Kew Road and the A316. It takes its name from the old pedestrian route from Richmond to the Kew ferry and was developed mainly during the C18 and C19. Kew Foot Road itself is probably the oldest path in Kew.
4. The Conservation Area statement notes that Kew Foot Road conservation area is a distinctive and well defined area containing an eclectic mix of building types and uses such as residential, commercial and institutional. The area is divided into two distinct character areas, being Kew Foot Road and Kew Road.
5. Kew Road is described as the centre of activity within the conservation area. Here this busy road is enclosed by predominantly brick built three storey terraced buildings lining the back edge of the footway. Street trees and wide pavements and the lively mix of shops and cafes create a somewhat continental atmosphere. Importantly there remain many traditional shopfronts, including the exceptional Art Deco frontage of Cafe Matthiae. To the South there is a more tightly packed group of small scale two storey terraced houses along Lower Mortlake Road and Blue Anchor Alley. Key buildings include the Old Fire Station and Christ Church.

## Proposals

6. The application proposals are modest in nature and comprise merely the proposed reversion of use from commercial proprietary club to a public house. There are no internal or external alterations proposed to facilitate this reversion of use. Consequently, no historic fabric is directly affected and the external architectural and historic character and appearance of the application site and surrounding conservation area will be respected and enhanced by the proposed investment into the property.

## Legislation, Guidance and Planning Policy

7. The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990. Section 16(2) states *“In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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.”* Section 66(1) reads: *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall 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.”* In relation to development within Conservation Areas, Section 72(1) reads: *“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*
8. Relevant sections of the 2021 Framework and set out in the covering letter.
9. The Planning Practice Guidance (PPG) was published in March 2014 as a companion to the Framework, replacing a large number of foregoing Circulars and other supplementary guidance. In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the Framework are to be interpreted.
10. Historic England’s Conservation Principles: Policy and Guidance 2008 sets out a logical approach to decision-making and offers guidance about all aspects of the historic environment. This document states that: *“New work or alteration to a significant place should normally be acceptable if: a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place; b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed; c. the proposals aspire to a quality of design and execution which may be valued now and in the future; and d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future”* (page 59).
11. The Development Plan for the appeal site includes the London Plan (2021) and the Richmond Local Plan (adopted 03/07/2018 and 03/03/2020, due to two legal challenges).
12. Policy HC1 of the London Plan covers heritage conservation and growth. Development proposals affecting heritage assets and their settings should conserve their significance by being sympathetic to the asset’s significance and appreciation within their surroundings.
13. Policy LP1 of the Richmond Local Plan addresses local character and design quality and requires all development to be of high architectural and urban design quality. Development proposals are assessed against a list of criteria, including compatibility with local character; relationship to the

public realm, heritage assets and natural features; natural surveillance and orientation; and suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through layout, design and management of the site.

- 14. Policy LP3 of the Richmond Local Plan concerns designated heritage assets and requires development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance, including the setting, of designated heritage assets will be conserved and enhanced. All proposals in conservation areas are required to preserve and, where possible, enhance the character or the appearance of the conservation area.

**Methodology**

- 15. A heritage asset is defined within the Framework as *“a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)”* (2021 Framework).
- 16. The significance of the heritage assets within the proposed site require assessment in order to provide a context for, and to determine the impact of, current development proposals. Significance is defined 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”* (2021 Framework).
- 17. The aim of this Heritage Statement is to identify and assess any impacts that the development may cause to the value or significance of the identified heritage assets. Impact on that value or significance is determined by considering the sensitivity of the receptors identified and the magnitude of change.
- 18. Table 1 sets out thresholds of significance which reflect the hierarchy for national and local designations, based on established criteria for those designations. The Table provides a general framework for assessing levels of significance, but it does not seek to measure all aspects for which an asset may be valued – which may be judged by other aspects of merit.

**Table 1 – Assessing Heritage Significance**

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings and Scheduled Monuments of exceptional quality, or assets of acknowledged international importance or can contribute to international research objectives.

	Grade I, Grade II* and Grade II Registered Parks and Gardens and historic landscapes and townscapes of international sensitivity.
High	Grade I, Grade II* and Grade II Listed Buildings and built heritage of exceptional quality. Grade I, Grade II* and Grade II Registered Parks and Gardens and historic landscapes and townscapes which are extremely well preserved with exceptional coherence, integrity, time-depth, or other critical factor(s).
Good	Scheduled Monuments, or assets of national quality and importance, or that can contribute to national research objectives. Grade II* and Grade II Listed Buildings, Conservation Areas with very strong character and integrity, other built heritage that can be shown to have exceptional qualities in their fabric or historical association. Grade II* and II Registered Parks and Gardens, Registered Battlefields and historic landscapes and townscapes of outstanding interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium	Grade II Listed Buildings, Conservation Areas, locally listed buildings and undesignated assets that can be shown to have good qualities in their fabric or historical association. Grade II Registered Parks and Gardens, Registered Battlefields, undesignated special historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Assets compromised by poor preservation and/or poor survival of contextual associations but with potential to contribute to local research objectives. Historic buildings or structures of modest quality in their fabric or historical association. Locally-listed buildings and undesignated assets of moderate/ low quality. Historic landscapes and townscapes with limited sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

19. Beyond the criteria applied for national designation, the concept of value can extend more broadly to include an understanding of the heritage values a building or place may hold for its owners, the local community or other interest groups. These aspects of value do not readily fall into the criteria typically applied for designation and require a broader assessment of how a place may hold significance. In seeking to prompt broader assessments of value, Historic England's Conservation Principles categorises the potential areas of significance (including and beyond designated assets) under the following headings:

**Evidential value** – *'derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.'* (Conservation Principles page 28)

20. Evidential value therefore relates to the physical remains of a building/structure and its setting, including the potential for below ground remains, and what this primary source of evidence can tell us about the past.

**Aesthetic Value** – *‘Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive’* (pages 30-31).

21. Aesthetic value therefore relates to the visual qualities and characteristics of an asset (settlement site or building), long views, legibility of building form, character of elevations, roofscape, materials and fabric, and setting (including public and private views).

**Historic Value** – *‘derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value’* (pages 28-30).

22. Historic value therefore relates to the age and history of the asset, its development over time and the strength of its tie to a particular architectural period, person, place or event. It can also include the layout of a site, the plan form of a building and any features of special interest.

**Communal Value** – *‘Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them...They may relate to an activity that is associated with the place, rather than with its physical fabric...Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there’* (pages 31-32).

23. Communal value therefore relates to the role an asset plays in a historic setting, village, town or landscape context, and what it means to that place or that community. It is also linked to the use of a building, which is perhaps tied to a local industry or its social and/or spiritual connections.
24. Once the value and significance of an asset has been assessed, the next stage is to determine the 'magnitude' of the impact brought about by the development proposals. This impact could be a direct physical impact on the assets itself or an impact on its wider setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself, rather than setting being considered as the asset itself.

**Table 2 - Assessing magnitude of impact**

MAGNITUDE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
<b>Very High</b>	<p><b>Adverse:</b> Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction.</p> <p><b>Beneficial:</b> The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.</p>
<b>High</b>	<p><b>Adverse:</b> Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood.</p> <p><b>Beneficial:</b> The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.</p>
<b>Medium</b>	<p><b>Adverse:</b> Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised.</p> <p><b>Beneficial:</b> Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.</p>
<b>Minor / Low</b>	<p><b>Adverse:</b> Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised.</p> <p><b>Beneficial:</b> Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.</p>
<b>Negligible</b>	Barely discernible change in baseline conditions
<b>Nil</b>	No discernible change in baseline conditions.

## **Assessment of Significance and Impact**

25. 115-117 Kew Road, Richmond, is a locally registered Building of Townscape Merit, situated within a designated conservation area and lying within the wider settings of nearby listed buildings. Therefore, any development affecting these can be held to have the potential of medium significance.
26. In assessing the impact of the proposed reversion to historic public house use, regard has to be had to the sensitivity of the receptors and the magnitude of change.
27. The proposed reversion to historic use and the resultant magnitude of impact of the proposals are held to be negligible in terms of historic value. The application proposals are very modest in nature, and simply comprise the reversion to public house use from commercial proprietary club, with no internal or external alterations to the property and no material change to the character of the use. No identified important elements of architecture will be affected by the proposed reversion of use and there would be no effect on any historic fabric.
28. The application proposals are considered to preserve the features of special architectural or historic interest of this heritage asset building and the character and appearance of the designated conservation area.
29. The setting of the host building itself, as a locally registered Building of Townscape Merit, would be respected. Given the modest and appropriate nature of the application proposals, it is also considered that the character and appearance of the designated Conservation Area, together with the settings of the nearby listed buildings, would be preserved. The heritage implications of the application proposals are considered to be modest and appropriate. It is therefore considered that there are no reasonable grounds, in terms of heritage impacts, to withhold the granting of planning permission in this case. For these reasons it is considered that any proportionate and reasonable assessment of the application proposals, against this adopted policy context, would conclude that there was no material conflict caused, given the true nature and extent of the application proposals. The application proposals are therefore considered to comply with the reasonable requirements of Policy HC1 of the London Plan and Policies LP3 and LP7 of the Richmond Local Plan.
30. The heritage implications of the application proposals are considered to be modest and appropriate and are considered to preserve the architectural and historic character and appearance and the settings of the host building and the nearby listed buildings, along with the character and appearance of the designated conservation area. Taking all of the above into account, it is therefore considered that there are no reasonable grounds, in terms of heritage impacts, to withhold the granting of planning permission in this case.



Prepared by

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