



# Heritage Impact Assessment

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31 The Green,  
Richmond

December 2023 | Project Ref 9416A





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# 1. Introduction

- 1.1** This Heritage Impact Assessment has been prepared by HCUK Group. It relates to an application for the residential conversion and associated alterations to 31 The Green, Richmond, London. The London Borough of Richmond Upon Thames (LBRuT hereafter) are the determining authority.



*Figure 1: 31 The Green, the application site*

- 1.2** 31 The Green is a grade II listed building located to the south of Richmond Green. The building originates in the late 18<sup>th</sup> century and has been considerably altered and adapted over time. The site is located in the setting of a number of other listed buildings, most prominently the adjacent buildings nos. 30 and 32 The Green (both grade II listed) and is located in the Richmond Green Conservation Area.
- 1.3** In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (2023) this statement describes the significance of the identified heritage assets.

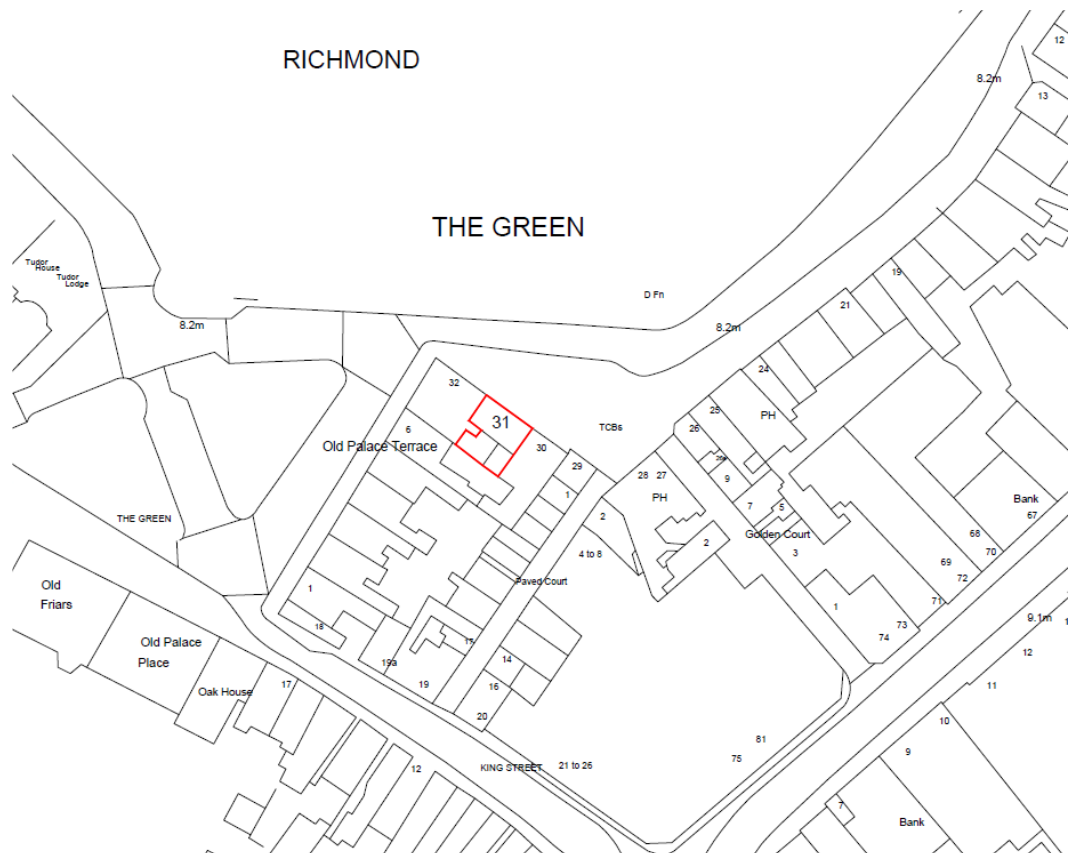


Figure 2: Site location plan

## The Proposals and Relevant Background

**1.4** While originally constructed as a dwelling house, 31 The Green is currently in use as offices. Proposals seek to convert the building back to its original residential use and undertake a series of alterations which can be summarised as:

- Internal reorganisation of the building to provide a more historically authentic plan form (reinstating the building's original layout where possible) including removal of modern partitions and the relocation of the staircase;
- Wholesale reinstatement of period appropriate detailing including new staircase, chimney pieces, skirting boards and joinery;
- Introduction of new fenestration to the modern rear extension (currently functioning as a meeting room);

- Recladding of the rear elevation with an appropriate brick slip (reclaimed London stock brick), replacing the existing modern and poor quality timber cladding;
- Introduction of solar panels on the existing modern flat roof;
- Removal of clutter on front elevation; and
- Landscaping enhancements to the rear garden.

**1.5** The proposals have been based on a thorough understanding of the significance of the identified heritage assets and seek to provide high quality dwelling suited to 21<sup>st</sup> century living while materially enhancing the unique heritage values of 31 The Green and the Richmond Green Conservation Area.

**1.6** Pre-application advice has been sought from LBRuT regarding the proposals (LPA ref: 23/P0153/Pre-app). Advice received as part of the pre-application stage has fed into the design development. Overall the advice concluded:

*In broad terms the proposals would not impact upon historic fabric, owing to the degree of internal alterations that have already taken place at the property. The proposals offer a mix of heritage benefits to be considered in the planning balance with respect to the proposed change of use back to residential..*

*With regards to heritage impact, the proposal would preserve the character, appearance and setting of the designated heritage asset. There are acknowledged heritage benefits which would be afforded a moderate to great weight in the assessment.*

## Purpose of this Assessment

**1.7** The purpose of this Heritage Impact Assessment is to assist with the determination of the application by informing the decision takers on the effects of the proposed development on the historic built environment. Value judgements on the significance of the identified heritage assets is presented and the effects of the proposals upon that significance are appraised. Particular regard is given to the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The report also sets out how the proposal complies with the guidance and policy of the National Planning Policy Framework (NPPF) 2023 and local planning policy. The site

and heritage assets affected have been observed and assessed following a site visit made by the author.

## 2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 16(2) and 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** Measures being implemented as a consequence of the Levelling Up and Regeneration Act 2024 will have the effect of making the desirability of preserving or enhancing other types of designated heritage asset a statutory consideration.
- 2.4** 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>
- 2.5** 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.

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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.

**2.6** 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.*

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

**2.8** 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**.

**2.9** 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

<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 CC SLG and others [2021] EWCA, Civ 320.



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.*

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

**2.11** One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-specific methodologies relating to the assessment of significance, and the effect of change on significance.

**2.12** The Local Plan for the LBRuT was adopted in July 2018 and March 2020. Relevant policies of this document include:

**2.13** **Policy LP1 Local Character and Design Quality:** Part A of this policy requires all development to be of high architectural and urban design quality and notes that the high quality character and heritage of the borough will need to be maintained. To ensure development respects, contributes and enhances the local environment, the Council note that the following will be considered:

- 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;
- Sustainable design and construction, including adaptability, subject to aesthetic considerations;
- Layout, siting and access, including making best use of land;

- Space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
- Inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
- Suitability and compatibility of uses, taking account of any potential adverse impacts of the collocation of uses through the layout, design and management of the site.

**2.14 Policy LP3 Designated Heritage Assets:** This policy notes that the Council require development to conserve, and where possible, make a positive contribution to the borough's historic environment and that 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 policy goes on to provide a series of criteria with the following points being relevant:

- "1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset..."*
- 4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.*
- 5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on an accurate understanding of the significance of the heritage asset.*
- 6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.*
- 7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists..."*

- 2.15** Part C of the policy notes that all proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.
- 2.16** The London Plan 2021 is the spatial development strategy for greater London and as such a piece of relevant planning policy. Of specific relevance is policy HC1 Heritage Conservation and Growth which notes that *“Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.”*

## 3. Background and Development

- 3.1** 31 The Green likely dates from the late 18<sup>th</sup> century though built form may have been present on the site earlier as indicated by mapping from the 1740s (**Figure 3**).



*Figure 3: Exact Survey of the City's of London and Westminster ye Borough of Southwark and the Country Near Ten Miles Round Begun in 1741 & Ending in 1745 by John Rocque*

- 3.2** At the time of its construction the building appears to have been a four bay and two storey (ground and first floor dwelling) likely featuring a pitched roof concealed by a parapet. It was almost certainly constructed as a single family dwelling.
- 3.3** Historic mapping from the 19<sup>th</sup> century (**Figures 4 and 5**) shows the structure as a standalone building of roughly rectangular form, with a small indent to the rear where the rear closet wing of the early 18<sup>th</sup> century 32 The Green projects into the building's footprint.
- 3.4** No census entries for 31 The Green could be located.



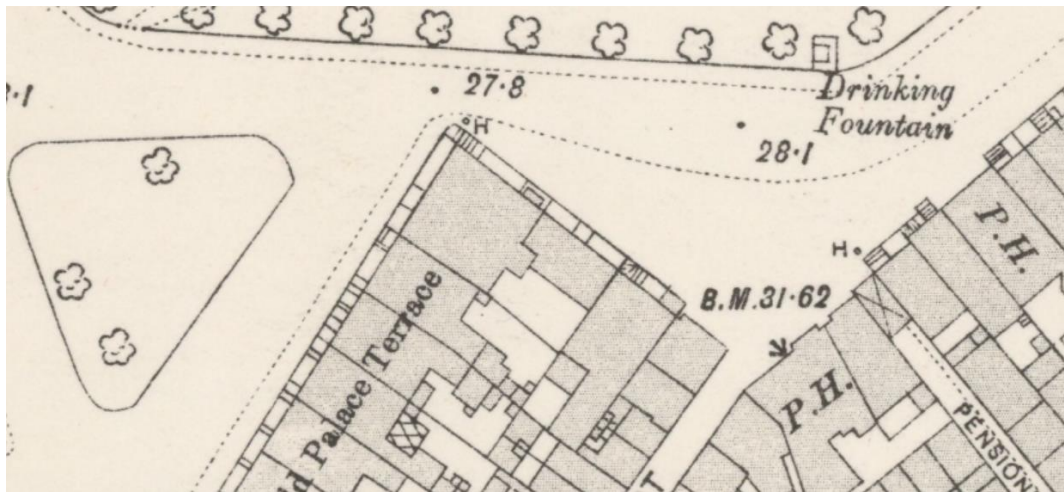


Figure 4: 1894 OS Map (surveyed 1893). Reproduced with permission of the National Library of Scotland

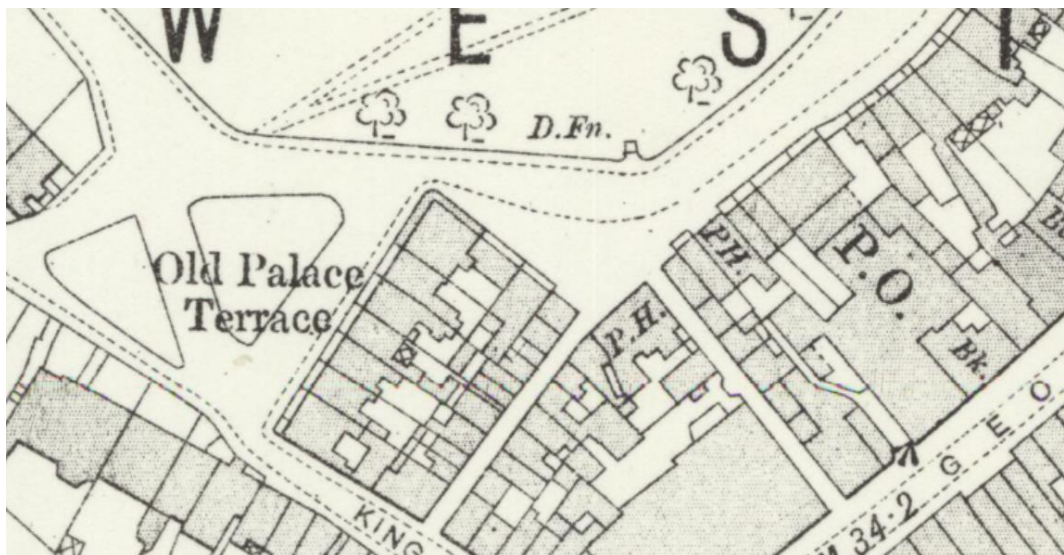


Figure 5: 1913 OS Map (surveyed 1910 to 1911). Reproduced with permission of the National Library of Scotland

### 3.5

During the end of the 19<sup>th</sup> century and early 20<sup>th</sup> century the building had fallen into a state of considerable disrepair. A c.1901 painting (**Figure 6**) of the building and its neighbours shows the derelict building covered in ivy and missing its historic roof.



Figure 6: c.1901 painting of the application site

**3.6** Reconstruction of the building is known to have occurred before 1920 as a result of:

- A 1920 entry in the Electoral roll for 31 The Green in the name of John Turner; and
- A series of 1920s aerial photographs (**Figures 7 and 8**) which show the building having been restored and fitted with a flat roof.

**3.7** Based on a physical assessment of the building it would seem as though the c.1920 were substantial in their nature and essentially included a reconstruction behind the retained façade (and some of the retained rear elevation). In addition, these works included the creation of an additional storey (second floor) to the building which is evidenced the change of brickwork to the front elevation and flat roof.

**3.8** The building remained in use as a single family dwelling into the 1930s when it was the home of Mr Algernon Black (included in various newspaper articles about his daughters marriages and the 1939 Register).

**3.9** A 1940 newspaper article also references the building being occupied as a dwelling by Mrs E H Cherry.



*Figures 9 and 10: 1920s aerial photographs showing 31 The Green restored as a three storey building with a flat roof*

### 3.10

At some point after 1940 the building's use as a single family dwelling ceased and the structure was incorporated into the neighbouring 32 The Green as an extension to that dwelling.



*Figure 11: 1943 photograph (left) and 1963 photograph (right) of 31 The Green © Historic England Archives*

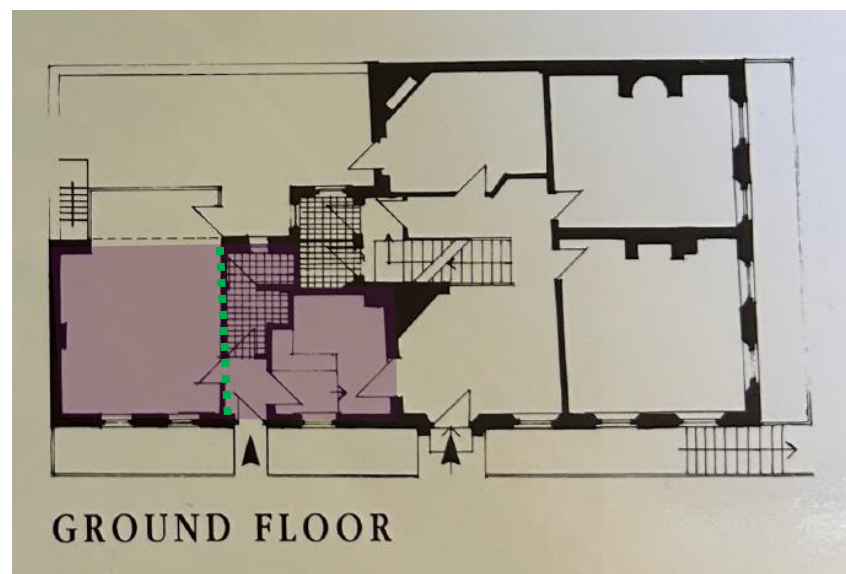




*Figure 12: 1971 photograph of 31 The Green showing the very clear difference in brickwork between the original 18<sup>th</sup> century brick and different brick to the upper floor*

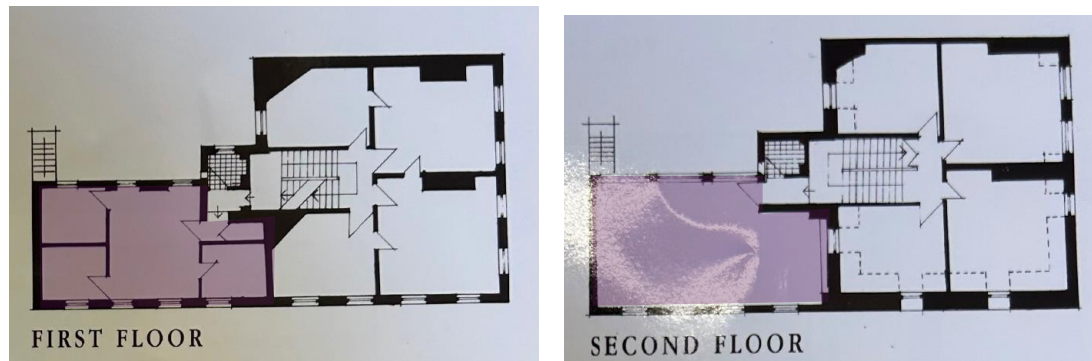
### 3.11

Plans from 1991 (**Figures 13-15**) show how nos. 32 and 31 were internally linked and the layout of the building at that time. It is clear that the internal connection of these two buildings led to significant changes to 31 The Green in terms of plan form and circulation, specifically through the loss of original partitions and staircase.



*Figure 13: Ground floor plan from the 1990s with 31 The Green highlighted in purple*





*Figures 14 and 15: First and second floor plans from the 1990s with 31 The Green highlighted in purple*

**3.12** At the time of the 1990s plans, one partition did survive within the building which likely demonstrated part of the building's original plan form, marking a division between the original stair hall and large ground floor room. This partition is demarked on Figure 13 with a green dashed line. Only small remnants of this partition survive today.

**3.13** In the 1990s a planning permission and listed building consent application was consented for:

- 91/2234/FUL and 91/2234/LBC – Separation from No. 32 The Green by closing up existing opening in party wall and use of no.31 as a single family dwelling. Demolition of existing and erection of new conservatory

**3.14** The resulting layout internally now present internally is one which is not historically accurate with the staircase in a non-original location and modern partitions throughout with loss of the original compartmentalised arrangement. Internally fabric (including floor structures, partitions, plasterwork and joinery) is entirely modern. Other changes can be summarised as the replacement of rear elevation windows with modern sashes and introduction of modern weather board cladding to the rear elevation.

## 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 comments on the contribution of setting to significance. In accordance with paragraph 194 of the NPPF, the descriptions are proportionate to the asset's significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.
- 4.2** With regards to matters of setting, 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**.
- 4.3** It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets. Change is only considered to be harmful if it erodes an asset's significance. Understanding the significance of any heritage asset affected is therefore fundamental to understanding the scope for and acceptability of change.

### 31 The Green (grade II)

- 4.4** 31 The Green was designated as a grade II listed building (UID: 1065310) in January 1950. It's list description, one of the older types for identification purposes only, reads:

*Probably late C18, 3 storey house, 4 windows wide. Yellow brick with parapet. Semi-circular entrance door. Square headed flush framed windows retaining glazing bars. Interior not seen.*

**4.5** As identified in the preceding section, the building has been heavily altered over time, primarily stemming from the early 20<sup>th</sup> century restoration and upwards extension and the subsequent various phases of internal works over the course of the later 20<sup>th</sup> century.

**4.6** Based on an understanding of the building's past it is evident that only limited original historic fabric associated with 31 The Green survives. This can be summarised as including:

- The front elevation brickwork (which is likely to date to the late 18<sup>th</sup> century up to the first floor, then dates to the early 20<sup>th</sup> century to the parapet line);
- The front elevation windows;
- Minor aspects of brickwork to the rear elevation (full extent unknown and concealed behind timber cladding);
- The front area railings (though some aspects, for example finials, have been replaced); and
- Potentially minor aspects of internal fabric for example party walls and partitions.

**4.7** These surviving elements of fabric are of clear historic and architectural value and interest and, from surrounding streets and spaces, provide a clear sense of historic legibility to the site, indicating that the building has Georgian origins.



*Figures 16 and 17: Front elevation and area railings of 31 The Green*

- 4.8** The front elevation, while altered, broadly retains its Classical characteristics and detailing which are indicative of a late 18<sup>th</sup> century date. In particular the surviving historic windows, door case and area railings present as an attractive composition both individually and within the wider streetscape.



*Figure 18: 31 The Green viewed in the wider streetscape*

- 4.9** The rear elevation of the building is very heavily altered with replacement windows and the whole elevation now covered in a modern black painted timber weatherboard cladding. Some areas of this cladding have been removed and the substructure revealed is clearly very mixed both in terms of material and date:

- The large area at ground floor level removed demonstrates mid to late 20<sup>th</sup> century concrete blockwork construction.
- The opening between the two first floor windows shows the potential survival of historic (18<sup>th</sup> or 19<sup>th</sup> century) London stock brickwork.
- The opening to the right hand side of the second floor window (part of the early 20<sup>th</sup> century upwards extension) shows the presence of 20<sup>th</sup> century Fletton brickwork.





*Figures 19 and 20: Views of the rear elevation of 31 The Green with some areas of opening up*

#### 4.10

The existing timber cladding is an atypical feature of a Georgian dwelling and does not contribute to or better reveal the significance of the listed building. It has likely been introduced in an attempt to conceal the mixed character of brickwork on the rear elevation. The building's original rear elevation would almost certainly have been a brown London stock brick, similar to the front elevation and closely resembling that present to the outrigger of the adjacent 32 The Green which can be seen in the application site's rear yard (**Figures 20 and 21**).



*Figures 20 and 21: Rear elevation and outrigger at 32 The Green*

**4.11** As evidenced by appraising the 1990s floor plans of the building's, the interiors of 31 The Green have been significantly altered over time. The original layout of the building would likely have been arranged with a central staircase, pushed up against the rear elevation flanked by a smaller room (set against the earlier outrigger of no. 32) and a larger room. The only internal partition which looks to relate to this earlier plan form is a single partition dividing the main office and WC at first floor level.



*Figures 22 and 23: Ground floor main office (left) and modern surface detailing (right)*



*Figures 24 and 25: Modern cornices and plasterboard ceilings present at 31 The Green*



**4.12** All surface and decorative fabric within the building is modern and this includes the existing staircase, joinery, plasterwork and cornicing (**Figures 22-29**). The ground floor a poured concrete base while upper floors are set on timber joists with floorboards, all of which appears to date from the early to late 20<sup>th</sup> century. As such, the building's heavily altered interior is not of any special interest in its own right and is not sensitive to change. Indeed, changes to the interior could significantly enhance the asset's significance and special interest.



*Figures 26 and 27: Modern joinery detailing present at 31 The Green (left) and the 1990s staircase (right)*



*Figures 28 and 29: Second floor main office (left) and 20<sup>th</sup> century floorboards present beneath the modern floor at second floor level*

**4.13** Overall, the significance of 31 The Green primarily relates to the surviving elements of historic fabric and the character and quality of the building's front elevation which, while altered through the introduction of a second floor, sits comfortably in the streetscape of The Green between two other 18<sup>th</sup> century buildings. The building also possesses a degree of historic interest as a long standing element of historic townscape which provides some illustrative value as to architectural characteristics and practices of the late 18<sup>th</sup> century and early 20<sup>th</sup> century.

## The Richmond Green Conservation Area

**4.14** The Richmond Green Conservation Area was first designated in January 1969 and was subsequently extended in November 2005. The designated area focuses on Richmond Green and the surrounding built form, it is enclosed by a number of other conservation areas including the Central Richmond and Richmond Riverside areas.

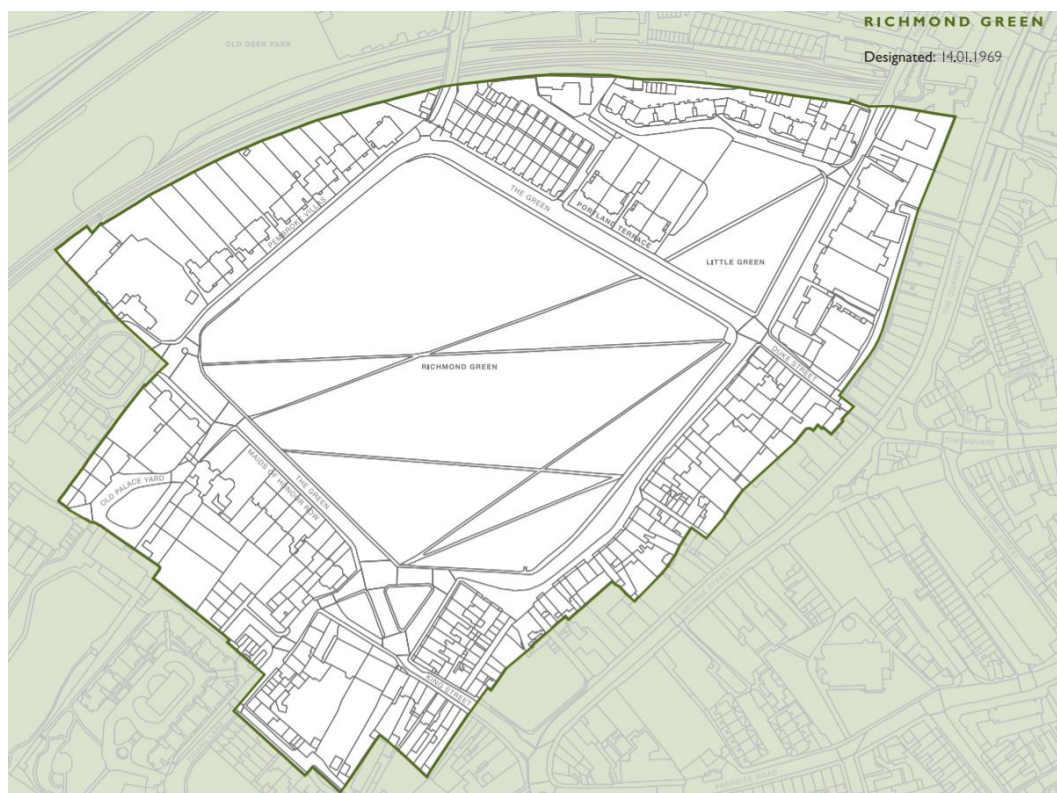


Figure 30: Richmond Green Conservation Area boundary map



**4.15** Aside from the Central Richmond, Richmond Green & Richmond Riverside Conservation Area Study (2001); and Richmond Green Conservation Area Statement (2007), LBRuT have recently produced a draft Conservation Area Appraisal for the conservation area which is accessible online<sup>7</sup>.

**4.16** The Conservation Area Study and draft Conservation Area Appraisal provide a comprehensive description of the history and development of Richmond and the area now covered by the Richmond Green Conservation Area and is not replicated here for brevity.

**4.17** This draft conservation area appraisal provides a summary of the special architectural and historic interest of the conservation area as:

- *Richmond is a historically significant settlement, which has origins dating from the 14<sup>th</sup>*
- *The use of a variety of materials, including red and stock facing brick, stucco, both decorative and plain, and stone facing are evenly distributed throughout the area.*
- *The townscape is noteworthy for its variety, with a consistently high quality and many exuberant individual buildings. There are also residential areas of mainly terraced development and more uniform rows of houses of a similar design.*
- *Building heights vary from two to five storeys and roof treatments vary but pitched roof forms predominate.*
- *Richmond Green is an open space with a tranquil residential character. It provides a welcome contrast from the busy town centre and is used year-round by visitors and residents alike.*
- *The Green is lined on all sides by residential properties of varying ages and - architectural styles. The south side is also home to many offices and businesses.*
- *Little Green is defined by Richmond Theatre and Richmond Library, which lend a distinct character in contrast to the buildings surrounding the larger Richmond Green.*

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<sup>7</sup> [https://richmond.gov.uk/richmond\\_green\\_conservation\\_area\\_appraisal](https://richmond.gov.uk/richmond_green_conservation_area_appraisal)

- *The remains of Richmond Palace, a royal residence of King Henry VIII and Elizabeth I, are located to the west of Richmond Green.*
- *Richmond Theatre, Maids of Honour Row and Palace Gate House are important architectural contributors to the Green.*
- *Several small lanes, some dating from the early development of Richmond – Brewer’s Lane, Golden Court, Waterloo Place, Church Court, Victoria Place, Mitre Court and the Market Passage – provide a refuge from traffic and are spaces of a more intimate nature.*
- *The lanes to the south of Richmond Green are lined with small businesses and boutique shops that add a commercial dimension to the character of the Green. They remain largely residential on the upper floors.*
- *Richmond Green is well known for its striking visual character and has been used as a backdrop for a number of television series and films.*

**4.18** The main element of the conservation area is the central elegant urban green which is enclosed and surrounded by substantial houses of dating from the 17<sup>th</sup> to 19<sup>th</sup> centuries. Key components of the Green is its expansive openness complete with mature trees arranged in avenues, long straight paths and gaps between the surroundings buildings which allow a backdrop of sky and tree tops to appear. The enclosure and tree coverage provides it with an inward facing character. The Conservation Area Statement describes the Green as:

*It is a fine example of an early urban green with a feeling of formal elegance and provides a fittingly grand setting for the houses that surround it.*

**4.19** The architectural interest of the conservation area primarily derives from the built form within it. While all sides of the Green share characteristics in terms of palette of materials, scale etc. each side is quite different in terms of architectural form and townscape. The Conservation Area Statement summarises the built form as:

*The scale of the development surrounding The Green is predominantly two and three storey. Properties have tiled roofs, some with small dormer windows behind parapets or eaves cornices. Varying numbers of bays, bay widths and changes in roof and window levels accentuate the individuality of each building within the whole pattern.*

**4.20** The area including the application site is described in the draft Conservation Area Appraisal as:

*The south-west frontage facing the Green is less uniform, but the buildings are of an equally high quality. A key element of the character of this frontage is the changing visual experience as one moves along the road, due to the differing building lines, garden sizes and tree cover.*

**4.21** 31 The Green makes a clear positive contribution to the character and appearance of the conservation area. This contribution is primarily by virtue of the attractive frontage of the building and its role within the wider streetscape of buildings surrounding the green. The rear elevation of 31 The Green is well concealed from public view and, due to its mixed brickwork with poor quality timber cladded character is not a positive element of the conservation area and, where visible (for example from within the site's yard or windows of other buildings) is a detracting feature.

## Nearby Listed Buildings

**4.22** Either side of 31 The Green are listed buildings. The grade II listed 30 The Green (UID: 1065309, first listed December 1968) is located to the south east of the application site while the grade II\* listed 32 The Green (UID: 1357770, first listed January 1950) is located to the north west. These buildings both have the older types of list description, for identification purposes only, which (respectively) read:

*Mid C18, 3-storey house with basement. Three windows wide. Built in brown brick with red dressings with tiled hipped roof behind parapet. Large central window at second floor level. Entrance door to left with doorcase and trellis porch. Square headed casement windows. Interior not seen.*

*Early C18 brick built with hipped tiled roof. Four windows wide. Two storeys high, with dormers. No 32 is the last house of the terrace, adjoining No 6 Old Palace Terrace, having 4 windows on each facade. Doorcases with carved pulvinated frieze and entablature on consoles. Square headed flush framed sash windows retaining glazing bars. Brick band between storeys. Interior not seen.*



*Figure 31: 31 The Green viewed in conjunction with 30 The Green (grade II), left*



*Figure 32: 31 The Green viewed in conjunction with 32 The Green (grade II\*), right*



- 4.23** These buildings are of clear architectural and historic interest due to their surviving historic fabric and form, 18<sup>th</sup> century date of construction, historically legibility character and the way they provide tangible physical evidence of the 18<sup>th</sup> century development of this part of Richmond and the Green.
- 4.24** As their direct neighbour of a similar date of construction, 31 The Green makes a generally positive contribution to these assets allowing their front elevations (from where their special interest is best experienced) to be appreciated within an in keeping and consistent streetscape. The building's rear elevation, particularly with regards to 32 The Green (grade II\*) which is visually prominent in the rear garden, is an unattractive element of the setting of these assets and could be considered to detract from an ability to appreciate their significance due to its atypical materiality.

## 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 effects on the setting of those assets. With regards to setting matters, 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 application drawings.

### Impact Assessment

**5.2** As identified in the Introduction, the proposed development entails the conversion of 31 The Green from its current office use back to functioning as a single family dwelling, its original use. Physical works associated with this conversion can be summarised as:

- Internal reorganisation of the building to provide a more historically authentic plan form, reinstating partitions on original alignment wherever possible;
- Wholesale reinstatement of period appropriate detailing;
- Introduction of new fenestration to the modern rear extension;
- Recladding of the rear elevation with an appropriate brick slip (reclaimed London stock brick), replacing the existing modern and poor quality timber cladding;
- Introduction of solar panels on the existing modern flat roof; and
- Landscaping enhancements to the rear garden.

**5.3** These aspects of the scheme, and their effects on heritage values, will each be considered below under the relevant subheadings.

### Change of Use to Residential

**5.4** As identified in Section 3, 31 The Green was almost certainly constructed in the late 18<sup>th</sup> century as a single family dwelling. While it remained within this use for much of its lifetime, it had been converted to form part of the adjacent no. 32 during the

20<sup>th</sup> century. Following the division of the buildings in the 1990s, no. 31 has functioned in a non-residential use as an office.

**5.5** Proposals seek to reinstate the building's original use which would be an eminently suitable use for the building (both individually and in the context of dwellings located around the Green) and one which would be beneficial to the asset's significance insofar as:

- The proposals would reinstate the building's original use;
- The use would be wholly in keeping with the residential character of the wider area; and
- The use would provide for the building's long term conservation and maintenance and is a use that would lead to investment in the structure and its surroundings.

**5.6** These factors clearly suggest that the proposed conversion to residential use is a sensible one and one which would be consistent with the conservation of the listed building (paragraph 197 of the NPPF).

**5.7** At pre-application stage, officer advice noted that:

*The applicants have argued that a number of heritage benefits could be achieved which would outweigh the harm caused by the loss of the existing office. In order to achieve this, the applicant would need to demonstrate that the conversion to residential results in the optimum viable use for the building and results in less intervention than the present office use, thus lead to a benefit in heritage terms. It would also need to be demonstrated what works could be achieved from the conversion that could not be achieved from the retention of the current use.*

**5.8** In terms of optimum viable use, paragraph 015 of the NPPG defines optimum viable use as:

*If there is only one viable use, that use is the optimum viable use. If there is a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes.*

*The optimum viable use may not necessarily be the most profitable one. It might be the original use, but that may no longer be economically viable or even the most compatible with the long-term conservation of the asset. However, if from a conservation point of view there is no real difference between viable uses, then the choice of use is a decision for the owner.*

**5.9** In this case, the proposed use as a single family dwelling likely represents the building's optimum viable use being its original use and one which facilitates clear strong heritage benefits (see below). While other uses (including the building's existing office use) could also be found to be viable, these would not facilitate the restoration of the building's original use and could require potentially harmful changes to the building, for example introduction of detrimental plant etc.

**5.10** While the change of use to residential could be undertaken with very few alterations to the building itself, a detailed scheme of enhancement works has been created in order to reinstate lost detailing and character to the building. As such, while more intervention is proposed than continuation of the office use would necessarily require, as discussed below, this is found to be wholly beneficial to the significance of the listed building.

**5.11** It is also important to note that this level of restoration simply would not occur should the building be retained in its current, non-original, office use. There is no incentive for such works given the building currently functions as an office, especially given the cost implications of the restoration.

**5.12** Overall, the proposed change of use is found to amount to a considerable heritage benefit reinstating the original building use which likely also amounts to the building's optimum viable use. The benefit of this change of use has been recognised by LBRuT as part of the pre-application stage advice.

## External Alterations

**5.13** No physical alterations, aside from general repairs and maintenance as required, are proposed to the building's front elevation and the removal of visual clutter including signage and CCTV. In this sense, 31 The Green will be visually enhanced and continue to be appreciated and experienced in the same way from the Green and surrounding roads. The contribution that the front elevation makes to the



significance of the listed building and that of the conservation area and flanking listed buildings (nos. 30 and 32) would be entirely preserved.

- 5.14** The building's existing roof structure is a modern flat roof (introduced in the early 20<sup>th</sup> century) and proposals include the introduction of PV cells on this flat roof. Due to the modern nature of the roof no sensitive historic fabric would be affected and due to the building's existing parapet these PV cells would not be visible from ground floor locations. While some visibility may be possible from upper floor windows of nearby properties it ought to be remembered that these are incidental views only (i.e. not designed views) and visibility of discretely located renewable energy sources in the context of historic buildings and townscape should not be automatically viewed as harmful given the focus on providing green energy. Overall, the introduction of PV cells to the roof would not cause any harm to the significance of either the host listed building, neighbouring listed buildings or the conservation area.
- 5.15** To the rear of the building proposals include minor changes to the fenestration of the existing 1990s extension, essentially enlarging the existing windows to provide a series of openable bi-fold doors providing access outside and changing the style of windows to provide them a more in keeping multi-pane character. These works would affect modern fabric only, would allow the building to function more successfully as a dwelling and would have no bearing on the significance of the identified heritage assets.
- 5.16** As noted in the preceding section, the rear elevation of 31 The Green is non-traditional and atypical for a Georgian building of this nature. Its original stock brick elevation has been significantly affected by various phases of alteration (meaning large areas of modern brick and concrete are now present) and the whole elevation has been clad in timber weather board cladding to conceal the mismatched substrate. While containing some historic brickwork, as a whole therefore, the rear elevation is a detracting feature both of the listed 31 The Green and the wider conservation area and two adjacent listed buildings.
- 5.17** Proposals seek to provide a high quality replacement finish to the rear elevation which is far more in keeping with its historic character and the character of the building as a whole. Rather than proposing to entirely reconstruct this elevation (and acknowledging that some historic fabric does survive within it) it is proposed

to remove the timber cladding and introduce a new cut brick (brick slip) cladding to the elevation, concealing the mismatched brickwork and providing a consistent finish to the structure. The proposed brick slips would be reclaimed London stock bricks that would be indistinguishable from the original brickwork of the neighbours rear elevation in terms of looks, lime pointing, window heads, bond etc. The existing battens may stay in place and (where possible) no new fixings into existing masonry, only the boards would be replaced by a reclaimed brick slip skin. Existing windows would be retained, pipework and cables removed and the only other change would be the replacement of the existing rear door with an in keeping window with no loss of historic fabric.

**5.18** Overall, this wholly reversible (due to the use of reclaimed London stock brick slips) change would materially improve the character and appearance of the building's rear elevation. The beneficial effect on heritage significance would be most notable with regards to the grade II listed host building but there would also be beneficial effects with regards to the character and appearance of the conservation area and the ability to appreciate the significance of the nearby listed buildings, most notably no.32 The Green (grade II\*) by better tying in the rear elevation with the fabric of this building. At pre-application stage, officer advice noted the beneficial effects of this change stating that:

*Whilst these proposed works would be aesthetically pleasing, the end result would essentially be a new façade, albeit in keeping with the style of the original elevation. As such, whilst some weight could be given to these works as a heritage benefit it would be of no more than a moderate level.*

**5.19** Other changes within the rear yard area include the introduction of soft landscaping, rainwater collection and a bike store and bin store. These works represent a wholly minor change on the site and within the conservation area and setting of the listed buildings that would have no effect on the assets' significance.

## Internal Alterations

**5.20** One of the key changes internally within 31 The Green relates to changes of plan form to better reflect the likely historic layout of the building. While original (i.e. late 18<sup>th</sup> century) plans of the building are not available, an estimation of the original plan form and circulation can be suggested from both the 1990s plans and

an understanding of the characteristic compartmentalised plan form of residential dwellings of this date, scale and status.

**5.21** This detailed assessment has informed the proposed layout of the building (which seeks to retain the one first floor partition which may pre-date the 1990s works and reinstate a partition at ground floor as shown on the 1990s plans which is likely in its original position). The resultant layout features a winding staircase, located within an entrance hall, directly opposite the entrance door in its likely original location and two flanking rooms at each level. At ground floor level a small WC has been located to the rear of the entrance hall behind the staircase which is served by a new window in place of the existing modern rear door.

**5.22** This arrangement, informed both by the building and a detailed understanding of Georgian plan form, would fully restore a historically informed compartmentalised arrangement at the listed building. This alteration is a clear heritage benefit which would demonstrably enhance the building's architectural and historic interest. The beneficial effect of this change was acknowledged at pre-application stage with officers concluding:

*There are good heritage benefits to be derived from the restoration of the entrance hall and staircase, with the traditional layout of flanking rooms leading off on either side.*

**5.23** Officers also acknowledged that this change of layout would be unlikely (in practice almost certainly not possible) should the building be retained in office use where there are preferences for open plan offices etc.

**5.24** Another aspect of the proposals relates to the introduction of internal detailing which is appropriate for a late 18<sup>th</sup> century dwelling of this scale and status. While the building's original detailing (decorative plasterwork, joinery and staircase) have been lost with no surviving evidence of form and appearance, it is possible to reinstate a suite of in keeping features which, together with the proposed layout, will enhance the architectural interest and evidential value of the building's interiors.

**5.25** The proposed cornices, skirting boards and doors have been chosen to provide a clear late 18<sup>th</sup> century character to the building's interior. These features are all appropriate individually for a building of this date and status and together provide a

coherent internal character. In addition, the features have all been chosen with a sense of vertical hierarchy in mind, i.e. the characteristically Georgian design feature whereby decorative fabric reduces in detailing and scale as you ascend a building. In this case, four panel Georgian doors are proposed to the ground and first floors with a two panel door at second floor level while cornices and skirting boards of reduced scale and decoration are proposed at second floor level. Proposed door ironmongery would also be carefully chosen to suit the character and period of the building.

**5.26** The proposed staircase has also been designed with late 18<sup>th</sup> century Georgian styles in mind, i.e. constructed from timber as a simplistic winder staircase with edge nosing, stick balusters and a moulded hand rail. The staircase would rise from ground to second floor and, as characteristic of the period, be consistent in detailing along its full height.

**5.27** Chimney pieces are also proposed to be introduced throughout the building in the form of a corner chimney piece in the smaller rooms and a chimney piece set on the flank wall with no.30 in the larger rooms. The use of a corner chimney piece is commonplace in buildings of the period and present in other dwellings of a similar age on the Green (for example Oak House and no.32). While designs for the chimney pieces have not been confirmed as yet, these would be period appropriate and informed by existing late 18<sup>th</sup> century fireplaces with reference paid again to a sense of vertical hierarchy.

**5.28** While original decoration at the building cannot be restored, the proposed introduction of decorative fabric (as discussed above) clearly represents a heritage benefit which results in an enhancement to the building's architectural interest and evidential value.

**5.29** As part of the pre-application advice offices noted that:

*...proposals to remove the current plaster finishes<sup>8</sup> to the walls and ceilings and replacing with lath and plaster could be of particular benefit if they restore the original ceiling heights, since the current lowered ceilings have resulted in*

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<sup>8</sup> i.e. plasterboard



*somewhat stunted room proportions that are notably uncharacteristic for buildings of this type and period.*

- 5.30** Current proposals seek to replace all internal plasterwork with lath and plaster (a clear heritage benefit enhancing the integrity of the interiors of the building and the building's evidential and architectural value) however there is unfortunately no scope to increase ceiling heights. While it is almost certain that ceiling heights would have been taller in the building originally it seems as though as part of the early 20<sup>th</sup> century refurbishment and introduction of an additional floor that the existing first floor level was dropped and original first floor ceiling removed to create additional space above. This means that existing plasterboard ceilings on all floors are fixed directly on to the bottom of 20<sup>th</sup> century joists.
- 5.31** The use of lime plaster throughout the building would also ensure that the building's internal plasterwork was fully breathable thus reducing the rate of decay of the existing structure.
- 5.32** As such, while this full benefit outlined by the council in this regard (i.e. the ceiling heights) cannot be achieved, introducing lath and plaster throughout is amounts to a clear and material enhancement to heritage values and the building's longevity that carries clear weight in the planning balance required.

## Summary and Policy Compliance

- 5.33** The proposed development is based on an understanding of the character, historic development and significance of 31 The Green (grade II) and the Richmond Green Conservation Area and nearby listed buildings, namely nos. 30 and 32 The Green (grade II and grade II\*). The proposed development has been informed by this alongside desk based research and on-site assessment of surviving historic fabric with the proposals being specifically designed to provide the building with a long term viable residential use that will see for the conservation of the listed building and materially enhance the architectural and historic character of the building.
- 5.34** While a number of the proposed changes to the building would have a neutral effect on its significance (and the significance of the conservation area and adjacent listed

buildings), a large number of the elements of the scheme are wholly beneficial to significance. This includes:

- The change of use which reinstates the building's original residential use, likely the building's optimum viable use (a heritage benefit in accordance with paragraph 020 of the NPPG);
- The introduction of a historically influenced compartmentalised layout to the building;
- The introduction of period appropriate detailing (cornices, skirting boards, architraves, doors, chimney pieces and the staircase) throughout the building;
- The use of lath and plaster throughout the building; and
- The introduction of a reversible in keeping reclaimed London stock brick slip rear elevation to 31 The Green (replacing the poor quality and detracting modern weather board cladding present).

**5.35** As such, the proposed development is found to entirely preserve and enhance the significance of the assets identified. As such, it is the findings of this report that the proposed works would fall outside of the remit of paragraphs 201-202 of the NPPF insofar as they will not result in any harm to, or loss of significance. There would be preservation for the purposes of Sections 16, 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

**5.36** The proposals are also found to entirely accord with the requirements of local planning policy, as follows:

- **Policy LP1 Local Character and Design Quality:** In accordance with the requirements of this policy the proposed development would be of a high quality and would maintain the borough's heritage.
- **Policy LP3 Designated Heritage Assets:** The proposed development is found to accord with this local policy insofar as the proposals would in no way adversely affect the significance of any heritage asset. Aspects of the original building at 31 The Green are preserved with other features (for example layout and architectural detailing) reinstated. The proposals are based on an accurate understanding of the significance of the heritage assets and seek to remove detrimental features (i.e. the building's open plan character and rear weather boarding).

- **London Plan 2021 Policy HC1:** In accordance with this policy the proposals would conserve (actually enhance) the significance of the identified heritage by being sympathetic to their significance and appreciation within their surroundings.

## 6. Conclusions

**6.1** This Heritage Impact Assessment presents an assessment of significance of 31 The Green (grade II), the Richmond Green Conservation Area and two nearby listed buildings, 30 The Green (grade II) and 32 The Green (grade II\*). This is followed by an appraisal of the effects of the proposals upon these heritage assets with consideration given to local and national policy and guidance.

**6.2** 31 The Green is a grade II listed building located to the south of Richmond Green. The building originates in the late 18<sup>th</sup> century and has been considerably altered and adapted over time meaning that it now contains only minor aspects of historic fabric and an almost entirely modern interior.

**6.3** While originally constructed as a dwelling house, 31 The Green is currently in use as offices. Proposals seek to convert the building back to its original residential use and undertake a series of alterations which can be summarised as:

- Internal reorganisation of the building to provide a more historically authentic plan form including removal of modern partitions and the relocation of the staircase;
- Wholesale reinstatement of period appropriate detailing including new staircase, chimney pieces, skirting boards and joinery;
- Introduction of new fenestration to the modern rear extension (currently functioning as a meeting room);
- Recladding of the rear elevation with an appropriate reclaimed London stock brick slip, replacing the existing modern and poor quality timber cladding;
- Introduction of solar panels on the existing modern flat roof; and
- Landscaping enhancements to the rear garden.

**6.4** The proposals have been based on a thorough understanding of the significance of the identified heritage assets and seek to provide high quality dwelling suited to 21<sup>st</sup> century living while materially enhancing the unique heritage values of 31 The Green and the Richmond Green Conservation Area.



**6.5** Section 5 of this report (alongside **Appendix 2**) presents an assessment of the impact of the proposed works on the significance of the identified heritage assets and concludes that the proposals would amount to a considerable heritage benefit insofar as the grade II listed 31 The Green, restoring its original use and a historically influenced plan form and internal decorative scheme (including lath and plaster throughout). The scheme would also result in a minor enhancement with regards to the conservation area and setting of the nearby listed buildings through the architectural enhancement works to the building's rear elevation.

**6.6** In summary, the proposed works to the grade II listed building and within the conservation area and setting of other listed buildings are considered to be beneficial to significance and therefore compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance. There would be preservation for the purpose of the decision maker's duty under Sections 16, 66 and 72 of the Planning (Listed Building and Conservation Area) Act 1990.

## 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>9</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>9</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 proposed development on the setting and significance of designated heritage assets, 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>Relevant Considerations</b>	<b>30 The Green (grade II)</b>	<b>32 The Green (grade II)</b>
<i>Proximity of the development to the asset</i>	The application site is located directly adjacent to the listed building	
<i>Proximity in relation to topography and watercourses</i>	The topography of the area is relatively flat and there are no water courses of relevance in this case	
<i>Position of development in relation to key views</i>	Key views of both listed buildings are possible from the Green. No changes to the front elevation of the application are proposed meaning that these views would not undergo any change. Views from their rear gardens would be improved through the removal of the poor quality weather board cladding and introduction of a consistent brick rear elevation to 31 The Green	
<i>Degree to which development will physically or visually isolate asset</i>	The alterations to the application site would, in no way, either physically or visually, isolate the two flanking listed buildings in any way	
<i>Prominence, dominance and conspicuousness and competition with or distraction from the asset</i>	The minor external changes to the building (i.e. changes to modern fenestration in the extension, recladding of the rear elevation and landscaping works) would not change the level of prominence the 31 The Green has within the setting of these buildings. Indeed, the change of weather boarding to brick on the rear elevation would cause less distraction by ensuring that the building had an architecturally in keeping rear elevation	

<i>Dimensions, scale, massing, proportions and materials and design</i>	There would be no overall change to the scale and dimension of 31 The Green and changes to materials and design (i.e. the recladding of the rear elevation) ensure that the building sits more comfortably within its surroundings
<i>Introduction of movement or activity</i>	The proposed development would change the activity on the site from that of an office to residential use but this would have no bearing on the significance or setting of the listed buildings
<i>Diurnal or seasonal change</i>	Matters of diurnal and seasonal change are not expected to be relevant in this case but have been factored into the wider assessment
<i>Change to built surroundings and spaces</i>	The proposals would result in a minor change within the surroundings of the listed buildings that would not result in any harm to the assets' significance or appreciation thereof
<i>Change to skyline, silhouette</i>	The proposed development would not lead to any change to the existing silhouette of skyline line of these listed buildings
<i>Change to general character</i>	The proposals would preserve the general character of the buildings' surroundings and result in some enhancements through the removal of the poor quality and atypical cladding to the rear of 31 The Green



## *Standard Sources*

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

[www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)

<http://magic.defra.gov.uk>

[www.history.ac.uk/victoria-county-history](http://www.history.ac.uk/victoria-county-history)

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2023

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)