

# The Boisot Waters Cohen Partnership

Project Consultants & Designers  
City Planning Consultants & Architects

Studio Petersham  
Gorshott, 181 Petersham Road, TW10 7AW

Tel: +44 07957871477

Email [architects@bwcp.co.uk](mailto:architects@bwcp.co.uk) Web [www.bwcp.co.uk](http://www.bwcp.co.uk)

## Principal

Brian Waters  
MA DipArch (Cantab) DipTP RIBA MRTPI  
pPresident ACA FRSA

## Associates

David Cunningham BA(Hons)  
DipArch ACI Arb MaPS  
Georgina Holden BA(Hons) Dip  
Arch MA

Manager: Melanie Hern



Your reference

Our reference

Date

1646/BW  
20th June 2024

TO: L B Richmond upon Thames

Re-application  
1 - 2 THE HERMITAGE, RICHMOND, TW10 6SH

via the Planning Portal

**BWCP**

## Heritage and Planning Statement

### 1 - 2 THE HERMITAGE, RICHMOND, TW10 6SH

This statement is in support of a revised planning application.

A pre-planning application with reference 23/PO296/PREAPP was submitted to the council, and a response was received on 17th January 2024. An application was made and a constructive dialogue with officers raised concerns of design detail. Amendments were made but it was felt that we needed more time to reflect on comments made to us so the application was withdrawn.

This proposal is a revised version of the original proposal which we believe addresses the officers' design concerns. No other planning policy issues were raised.

The architect's design and access statement relates the proposal well to relevant planning policies and to that extent I do not propose to repeat his effective presentation.

**The application site** comprises a pair of three-storey semi-detached dwellinghouses, located at the end of the northern side of The Hermitage. The buildings are identified as Buildings of Townscape Merit (BTM) and are designated within the Richmond Hill Conservation Area (CA5). There is no relevant planning history.

The sites are also subject to the following planning constraints:

- Archaeological Priority Area
- Area Susceptible to Groundwater Flooding >=50%
- Article 4 Direction- restricting basement development
- Critical Drainage Area
- Grade II Listed Building – Walls Enclosing Patten Alley – Footpath
- Richmond Town Centre Buffer Zone
- Throughflow Catchment Area
- Richmond and Richmond Hill Village
- Richmond Hill Character Area



No 2 (painted brickwork) and on the right No 1 (cleaned gault bricks with coloured pointing). The form of their roofs is not visible from street level.

## Relevant local policies are summarised

below (not exhaustive):

London Plan 2021:

- Policy D1 London's form, character and capacity for growth
- Policy D3 Optimising site capacity through design led approach
- Policy D4 Delivering good design
- Policy D12 Fire safety

Environment Directorate

PLANNING Official

- Policy HC1 Heritage conservation

Local Plan 2018:

- LP 1 Local Character and Design Quality

- LP 3 Designated Heritage Assets
  - LP 4 Non-Designated Heritage Assets
  - LP 8 Residential Amenity and Living Conditions
- Publication Local Plan (Regulation 19 Version):
- 28 Local Character and Design Quality
  - 29 Designated Heritage Assets
  - 30 Non-Designated Heritage Assets
  - 46 Residential Amenity and Living Conditions
- Supplementary Planning Documents / Guidance:
- House Extension and External Alterations
  - Richmond and Richmond Hill Village Planning Guidance
  - Richmond Hill Conservation Area Statement and Study
  - Conservation Areas
  - Buildings of Townscape Merit



The group of paired houses, 1 – 12 The Hermitage stepping up the hill. The central group of four pairs is more coherent since the end pairs lack the matching Mansard roofs and have differing roof forms.

## >>> The proposal and changes in response to the pre-application report and the feedback from officers to the recent application

The LPA considers that the main issues associated with the pre-app proposals relate to the following:

- 1 Design and Impact on Heritage Assets
- 2 Neighbour Amenity
- 3 Fire Safety

The proposal is to create a roof extension over both No1 & 2 The Hermitage, adding a bedroom and an ensuite to each of the two houses. The external appearance of the roof extension is intended to harmonise with the existing extensions on the majority of houses within the group, while addressing the uniqueness of No.1 as the end of the terrace.

According to the response received during the pre-planning consultation, the proposal is deemed not to result in a loss of light for neighbouring occupants, nor does it give rise to a harmful sense of enclosure, visual intrusion, or an overbearing impact.

The proposal retains the form of the roof over the northern portion of No.1 to maintain the prominence of the end facade with its bold cornice. Access to the site and the external appearance of the building at all other levels remains unchanged

### 1 Design and Impact on Heritage Assets

Policies LP1, 2 and 3 are relevant; their objectives are listed in the pre-application report as is the description of the houses.

**1 & 2 The Hermitage** are a pair of semi-detached houses within the Richmond Hill Conservation Area. The pre-application report considers the effect of the proposed roof extensions:

*“The built form of both is almost unaltered with no.1 featuring a small rear extension; both retain their original roof forms of a hipped roof to no.1 and gabled roof to no.2. As a result, nos.1 and 2 are the best preserved of the wider group they form a part of and retain a high level of their original architectural integrity and character.*

*- This wider group consists of six semi-detached pairs along the west side of The Hermitage. Aside from the painting of nos. 2, 4 and 12, externally the front facades retain a high level of cohesiveness and original detailing. Nos.1 & 2, and 11 & 12 are the only pairs not to feature mansard style roof extensions>>>*



1 – 12 The Hermitage stepping up the hill. Nos. 1 and 2 in the foreground

>>> with front dormers. Such extensions are highly visible in front and side views of the houses and have resulted in the addition of substantial bulk to the roofs, completely obscuring the original roof form.

- Both nos.1 & 2 make a strong positive contribution to the streetscape and character of The Hermitage as well as the wider area.

- The significance of nos.1 & 2 as BTMs is defined primarily by their architectural style and almost unaltered built form, surviving original features, alongside their group value with neighbouring buildings and contribution to the streetscape and character of The Hermitage.

- More widely, the significance of the Richmond Hill Conservation Area is defined by the age, quality, and variety of architecture within the area and the close relationship of this built environment to the views from Richmond Hill.

- Proposals seek to construct a mansard-style roof extension with front and rear dormers to match the extensions at nos. 3 - 10. This would involve the complete removal of the existing, original roof form.

- The proposed roof extension would not be supported in principle.

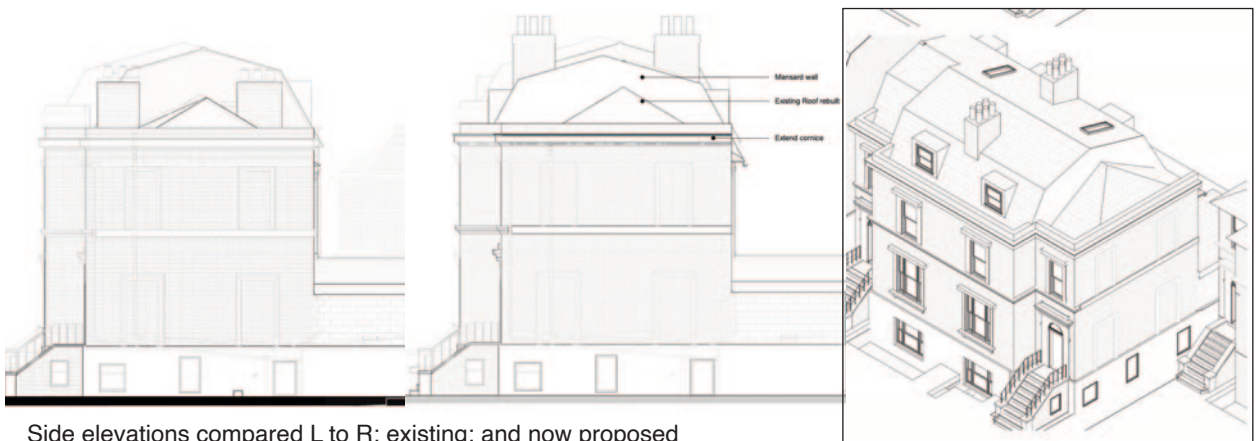
- Although it is acknowledged that similar roof extensions are present at four of the six pairs in the group, these were all implemented in the late 20th century (with no planning history for nos. 6-10), and therefore significantly pre-date current planning policies and guidance.

- As noted above, these form bulky additions to the roofscape and have completely obscured the original roof forms, having a harmful impact on both the appearance of the buildings and the architectural integrity and cohesiveness of the wider group.

- The proposed roof extension would result in the complete loss of the original roof form, which is unacceptable. This total loss of both original historic form and fabric would have a harmful impact on both the architectural integrity, character, and significance of the pair as BTMs.

- The roof extension would be a dominant and bulky addition to the top of the pair, with a substantial addition of mass at roof level. The negative visual impacts of such extensions are clear across the wider group, where the roof extensions are visible from side views as large additions to the roofscape. The proposed extension would be a dominant addition to the pair and would fail to be sympathetic or subservient to the main building.”

In my view, the constant repetition of the same, tautological, point, namely that a roof extension obscures the original roof form, underlines the weakness of the objection. That the original roof form is not visible from the surrounding street is not pointed out. My photo on page 1 demonstrates the invisibility of the existing, original roofs of Nos. 1 and 2 from the street. These are not listed buildings so the loss of ‘original fabric’ is not relevant. >>>



Side elevations compared L to R: existing; and now proposed



LEFT Photo: Seen from the rear L to R: Nos. 1 and 2, Nos. 3 and 4

BELOW LEFT: pre-app design

BELOW RIGHT: revised application proposal



>>> The report notes the significance of the group as Buildings of Townscape Merit, and that the absence of the roof extensions makes these houses inconsistent with the group. In my view this reduces the group quality. Nos 1 and 2, being the end pair at the bottom of the hill means that the proposed roof extensions, whilst looking similar to the others from the front, will be more visible from the exposed side view. This revised application acknowledges the unusual prominence of the end elevation by reducing the bulk and form of the roof extension while still achieving the matching frontage appearance. This will serve to reinforce the similarity of this pair to the adjacent houses in the group. Please see the drawing extracts for comparison.

The pre-application design omitted the heavy cornice which extends from the front and along the blind side elevation. This omission emphasised the visibility of the roof extension and was rectified in the previous application. The form of the roof extension has now been further diminished to minimise its visual impact given the special visibility at the end of the group and the falling away of the street.

The pre-application report also criticised the glazed nature of the proposed rear dormers, and said they would fail to retain a satisfactory window hierarchy as they would be significantly larger than those in the floors below. This too has been addressed in the revised proposal. Please see the 3-D view above and refer to the Design and Access Statement.

The applicant spoke to the duty planning officer before embarking upon the preparation of this planning application. He was advised before he purchased No. 2 that to add a mansard roof on No. 1 alone would not be acceptable since it would disrupt the roof form of the pair, but that it would be acceptable in principle if both Nos. 1 and 2 were extended together. It happens that the owner of No. 2 died and the applicant was able to acquire the house with a view to improving it and then reselling it. He has three young children who presently have to share a bedroom and is anxious to expand No. 1 as his children grow up so that they have adequate separate accommodation.

This addition of residential accommodation to both houses is a benefit which should offset any assessed harm arising from the proposal. It is supported by **Policy D3 of the London Plan: Optimising Site Capacity: A Design-led Approach**. No.2 in particular is inadequate as a family home without the additional floorspace.

**2 Neighbour amenity**

The pre-application report concludes: “- *The proposal is not considered to result in a loss of light to neighbouring occupiers*” but says “- *The dormers will introduce new windows at a higher level, these* >>>

>>> *would result in lines of sight above mutual overlooking given the large and open design allowing views to the side as well as the rear. When compared to the neighbouring windows which are small and of a traditional design, the proposed windows to nos. 1 and 2 are much larger and are considered to result in increased opportunities for harmful overlooking.*

*- The windows would result in privacy implications given the tight-knit nature of the locality and the existing level of mutual overlooking."*

This has been successfully addressed by the changes of position and design to the dormer windows in this proposal.

### **3 Fire Safety**

*The report says: "London Plan policy D12 requires the submission of a Fire Safety Statement on all planning applications."* This is provided.

### **Recent consultations with officers**

Application 24/0599/FUL was made on 05/03/2024 and, following some constructive feedback from the case officer and the conservation officer, it was withdrawn on 23/05/2024 in order to make a new application with the feedback incorporated.

The key elements of feedback from the conservation and urban planning officer received during that process were as follows:

Regarding 1 The Hermitage being at the end of the group: "The flanking, set back, lower elements of the roof should be omitted, so that there is only a central mansard element." [...] "There should be some semblance of balance retained between these bookends and the intention of the lower roof profile retained. The omission of the side element as originally requested would achieve this."

Regarding the front side dormer at no.2 " We would still maintain the front dormer is harmful as they are not considered characteristic, [it] would be visible from the public realm and most of the group does not have this element."

The revised proposal has incorporated the above feedback - namely

- 1) the set back side element roof of no.1 The Hermitage has been left as is, and
- 2) the front side dormer from 2 The Hermitage has been removed.

### **Conclusion**

With regard to details of the pre-application design, the pre-application report was helpful and constructive. The dialogue with the case officer and through her the design officer was similarly constructive and helpful and gave the applicant and his team food for thought. This further revised proposal does, we believe, meet all the guidance and advice given to us and the points raised have been addressed in this proposal. The detail is well illustrated verbally and visually in the D&AS so not repeated here. The additional residential floor space is itself a benefit and complies with higher level policy as well as emerging national policy which encourages the building of upward extensions, particularly taking the form of Mansard roofs. Inevitably, a roof extension replaces the original roof, which in this case is all but invisible from the street and its loss, although original fabric, causes no significant harm, particularly since this is not a listed building. It is fortunate that the applicant is in a position to carry out the roof extensions of both houses simultaneously.

Please be in touch if you require more information, have any queries or require access to either property.

Yours faithfully,



**Brian Waters**

**MA DipArch (Cantab) DipTP RIBA MRTPI pastPresident ACA FRSA**

*I am a chartered town planner and a chartered architect and my CV may be found at [www.bwcp.co.uk](http://www.bwcp.co.uk). Of some relevance here is my long experience as both the architect and planning consultant for many listed buildings, including fairly recently finding new uses and adapting two Grade I redundant churches in the City of Westminster – Sir John Soane's Holy Trinity in Marylebone Road and Arthur Blomfield's St Mark's North Audley Street.*

*Some time ago I was team leader and drafted the conservation area plan for Hampstead Garden Suburb for the Trust and adopted by the London Borough of Barnet.*