

Slug & Lettuce public house, Water Lane, Richmond, TW9 1TJ
Stonegate Group

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**PLANNING SUPPORT STATEMENT
INCORPORATING DESIGN AND ACCESS
STATEMENT AND HERITAGE
STATEMENT
PROPOSED INTERNAL ALTERATIONS AND
REFURBISHMENT/REDECORATION WORKS,
TOGETHER WITH REPLACEMENT EXTERNAL
SIGNAGE AND REPAINTING**

1.0 Introduction

1.1 This Planning Support Statement has been prepared to accompany applications for listed building consent and advertisement consent for proposed internal alterations and refurbishment/redecoration works, together with replacement external signage and repainting at an existing public house at the Slug & Lettuce, Water Lane, Richmond, TW9 1TJ. The application premises comprise a grade II listed building. Furthermore, the application site lies within a designated conservation area and some of the neighbouring buildings and structures are also listed. Consequently, this Planning Support Statement also includes a Heritage Statement, as well as a Design and Access Statement.

1.2 The Statement is set out in eight sections and comprises:

- 1.0 Introduction
- 2.0 Site Description & Surrounding Area
- 3.0 Proposals & Planning History
- 4.0 Relevant Planning Policies
- 5.0 Assessment of Planning Issues
- 6.0 Summary
- 7.0 Design and Access Statement
- 8.0 Heritage Statement

2.0 Site Description & Surrounding Area

2.1 The application site comprises existing public house premises located on Water Lane in Richmond. The application premises themselves are grade II listed. The application site lies within the designated Richmond Riverside Conservation Area.

2.2 The Historic England listing description for the application premises states that they originally comprised a warehouse and that they date from the eighteenth century. The Historic England listing description states:

“C18 building, 3-storeys high in stock brick with pantile roof. Five windows wide on Water Lane frontage and 3 windows wide on river frontage where there is also a central entrance door. Windows and door segmental headed. Sash windows retaining glazing bars”.

2.3 The public house premises are located on the ground floor of the host building. There are residential flats on the upper floors of the building. A pedestrianised area, including external seating, adjoins the frontage of the premises, between the building itself and the river Thames.

2.4 The application site is located on the banks of the river Thames in Richmond. The surrounding area contains a variety of mixed-use commercial premises, including other food and drink uses, together with residential properties. Buildings within the local area range in date and style.

3.0 Proposals & Planning History

- 3.1 The application proposals comprise internal alterations and refurbishment/redecoration works, together with replacement external signage and repainting at an existing public house at the Slug & Lettuce, Water Lane, Richmond, TW9 1TJ.
- 3.2 The proposed internal works include: alterations to and extension of the existing bar servery; new timber wall panelling; new flooring; new lighting and electrical fittings; the refurbishment of customer toilets; the removal of an existing display unit; and redecoration and refurbishment throughout. In addition, the application proposals include replacement external signage, comprising two externally-illuminated over-entrance signs, together with external repainting of the ground floor window frames. These proposals are detailed within the accompanying application drawings.
- 3.3 The site has been the subject of several past applications. Most recently, consent was granted in December 2015 for internal and external alterations (LPA reference: 15/3005/LBC). Prior to this, other schemes for alterations of these premises were consented in 2000 (LPA references: 00/2754 and 00/0633). Past signage schemes have also been consented in 2015 (LPA references: 15/1574/ADV and 15/1576/LBC); and 1994 (LPA references: 94/3517/LBC and 94/3737/ADV).
- 3.4 As with all commercial hospitality and leisure facilities such as this, the applicant needs to continually refresh and enhance its customer offer and attraction at this public house, in order to remain commercially viable and the application proposals should be considered within this context. The continued commercial viability of these commercial hospitality and leisure premises ensures the continuing maintenance and upkeep of these listed premises for a publicly accessible use.

4.0 Relevant Planning Policy

December 2023 Framework

- 4.1 The December 2023 Framework reiterates the presumption in favour of sustainable development (paragraph 11) which requires development proposals that accord with an up-to-date development plan to be approved without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless in conflict with the December 2023 Framework. The December 2023 Framework also requires LPAs to approach decisions on proposed development in a positive and creative way and to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible (all paragraph 38).
- 4.2 The December 2023 Framework requires planning policies and decisions to help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 85).
- 4.3 The December 2023 Framework requires planning policies and decisions to promote social interaction and opportunities for meetings between people who might not otherwise come into contact with each other (paragraph 96). The December 2023 Framework adds that in order to provide the social and recreational facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces and meeting places, such as public houses (paragraph 97).
- 4.4 The December 2023 Framework states that good design is a key aspect of sustainable development (paragraph 131). Planning policies and decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive; are sympathetic to local character and history, while not preventing or discouraging appropriate innovation or change; create attractive, welcoming and distinctive places; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks; and create safe, inclusive and accessible places that do not undermine the quality of life or community cohesion and resilience (all paragraph 135).
- 4.5 With regard to advertisements, the December 2023 Framework states that the control of advertisements should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts (all paragraph 141).
- 4.6 The December 2023 Framework requires that heritage assets are conserved in a manner appropriate to their significance (paragraph 195). Heritage assets should be put to viable uses

consistent with their conservation and development should make a positive contribution to local character and distinctiveness (paragraph 196). Development proposals should avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal (paragraph 201). In determining applications, LPAs should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 203). When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (paragraph 205). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (paragraph 206). Where a development would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (paragraph 208).

Development Plan Policies

- 4.7 The adopted Development Plan for the application site is the London Plan (2021) and the Richmond Local Plan (adopted 03/07/2018 and 03/03/2020, due to two legal challenges). The LPA is currently working on a replacement Local Plan, but this is not yet adopted.
- 4.8 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.
- 4.9 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.
- 4.10 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.

- 4.11 Policy LP18 of the Richmond Local Plan addresses the river corridors and requires development adjacent to these areas to contribute towards improvements and enhancements to the river environment.
- 4.12 The LPA has also published supplementary planning guidance on listed buildings and, separately, conservation areas.
- 4.13 The LPA has also published on-line the Richmond Riverside Conservation Area Appraisal – Conservation Area No. 4.

5.0 Assessment of Planning Issues

- 5.1 The proposed works essentially involve modest alterations and general refurbishment and redecoration of the interior of these existing public house/bar premises, together with external replacement signage and repainting of the ground floor window frames, as part of the applicant's refreshment and enhancement of these public house premises.
- 5.2 The proposed internal works include: alterations to and extension of the existing bar servery; new timber wall panelling; new flooring; new lighting and electrical fittings; the refurbishment of customer toilets; the removal of an existing display unit; and redecoration and refurbishment throughout. In addition, the application proposals include replacement external signage, comprising two externally-illuminated over-entrance signs, together with external repainting of the ground floor window frames. These proposals are detailed within the accompanying application drawings.
- 5.3 The proposed internal alterations and refurbishment works are considered to be sympathetic in design, form and materials and are modest and appropriate in nature and scale. No elements of historic fabric are proposed to be lost and the existing plan form of the premises is not significantly further affected. None of the features specifically addressed within the Historic England listing description are affected by the application proposals. These internal proposals are to generally refurbish and refresh the interior décor of the public house. The internal proposals are considered to be appropriate, sympathetic and result in no significant material harm to the historic and architectural fabric and character of the internal accommodation of the application premises. The proposed works are all considered to be appropriate and sympathetic, as well as modest and appropriate in nature.
- 5.4 The proposed works are therefore considered to be sympathetic to the historic and architectural significance and character and fabric of these listed premises. The proposed alterations; together with the new flooring and redecoration; can all be removed, without any impact upon historic fabric or character, when no longer required and are therefore fully reversible. The new flooring coverings and redecorations are also appropriate and sympathetic in nature and can also be easily removed when no longer required, without causing any damage to historic fabric, in line with best conservation practice. The internal proposals are therefore fully reversible when no longer required and comply with conservation best practice. The heritage implications of these internal alterations and refurbishment proposals are assessed in more detail in the accompanying Heritage Statement.
- 5.5 The external works proposed as part of the application scheme are confined to replacement signage and the repainting of the ground floor window frames. These elements of the proposals should be considered simply part of the applicant's on-going maintenance of these elements these

premises. The design and form of the replacement signage is respectful of the host premises and is similar to that which it would replace. Furthermore, the external painting is appropriate in colour. Consequently, the implications for the external character, appearance and fabric of the host premises themselves, along with their contribution to the character and appearance of this part of the designated conservation area, are considered to be acceptable and sympathetic. The settings of the neighbouring heritage assets are also respected and preserved by the external signage and repainting works.

- 5.6 Given the nature of the proposed works, with no below ground excavations proposed, there are no implications for any archaeological remains at and around the site.
- 5.7 The implications of the proposed internal alterations and refurbishment works, along with the external signage and repainting, on the historic significance, architectural fabric and character of these listed premises are assessed below in the accompanying Heritage Statement. It is considered that no significant, material detriment results to the historic fabric of these listed premises as a consequence of the proposed internal alterations and refurbishment works. The proposed internal alterations and refurbishment works are not considered to result in any significant, material or detrimental implications for historic or architectural significance, interest, character and fabric of these listed premises. The proposed internal alterations and refurbishment works are considered to be modest and appropriate in nature and scale. These works are generally reversible, in line with good conservation practice. The proposed works would have no significant nor detrimental impact upon the internal architectural and historic significance and character of the premises and would have only a modest direct impact upon historic fabric.
- 5.8 The proposed internal alterations and refurbishment works, along with the external signage and repainting, are therefore considered to be sympathetic to the historic and architectural character of these listed premises and are not considered to genuinely conflict with any of the wider aspirations of the local planning policy context for this site. In terms of their heritage impacts, the application proposals are therefore considered to comply with the aims and aspirations of the December 2023 Framework; Policy HC1 of the London Plan; and Policies LP1 and LP3 of the Richmond Local Plan. Furthermore, there is no conflict with the requirements of Policy LP18 of the Richmond Local Plan.
- 5.9 In the case of the application proposals, it is considered that less than substantial harm would be caused to the character, appearance, setting and the historic fabric of this listed public house. Furthermore, due to the nature of the proposals, it is considered that there would be no unacceptable implications for the settings of neighbouring heritage assets and the character and appearance of the designated conservation area. It is also considered that the applicant has genuine and reasonable requirements to undertake these proposed works, in order to safeguard the economic well-being of the existing beneficial use of these listed premises, for its established use, for a use that allows public access into them, and which ensures the on-going maintenance

and upkeep of the premises. These are significant public benefits derived from the application proposals. Any intransigence by the LPA about the proposals could have a serious detrimental effect on the economic viability of this public house/bar and the local employment, economic activity and leisure provision that it generates.

- 5.10 The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (hereafter ‘the regulations’) require the Local Planning Authority to only consider two issues with regard to advertisements; namely the interests of amenity and public safety. This is also replicated within para 141 of the NPPF (December 2023) which states that “*Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.*” In considering the impact on amenity, the effect of advertisements on the appearance of the immediate neighbourhood, where residents or passers-by will be aware of the advertisements, must be taken into account. Given their positioning overlooking the pedestrianised area at the end of Water Lane, adjacent to the river Thames, the proposed signs will be clearly visible to pedestrians and other users of these routes. However, the proposed signs have been designed to closely match the size, positioning and illumination method of the existing signs which they are to replace. The signs are thought to be visually compatible with the established appearance of the building’s riverside frontage and its wider visual context.
- 5.11 The proposed signs will be essentially ephemeral in nature and will not result in any significant or material impacts upon the character and appearance of the host building and are considered to be appropriate in nature and scale. Illumination of the proposed signs is considered to be both reasonable and justified for the premises, given the trading hours and the nature of the applicant’s business, which includes evening and night-time trade. The proposed lighting will be discrete, and the size of the lettering is in proportion with the detailing and scale of the host building, ensuring that there would be no harm in this regard. Furthermore, the existing signs on these positions on the premises are also externally illuminated, such that the display of externally illuminated signage has become an established part of the visual character of the host building and its contribution to the local street scene. The materials and colours will also be compatible with the character of the host building and the wider street scene. With this in mind, the signs are not considered to look out of place and will not result in any material harm to the character of the area.
- 5.12 The relevant considerations for determining proposals for advertisement consent comprise visual amenity and public safety only. Visual amenity is not only related to the aesthetics of the specific signage but must relate to visual considerations of the surrounding area, including any detriment caused by loss of investment to commercial buildings and their external appearance. The December 2023 Framework is clear that the control of advertisements should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

- 5.13 In considering public safety, the impact of the signs on the safe use and operation of any form of traffic or transport, including the safety of pedestrians, must be taken into account. The proposed signs would overlook the pedestrianised environment adjacent to the river Thames. Consequently, it is not considered that vehicular traffic would be materially impacted by the proposed signs. Nevertheless, the behaviour of any drivers of vehicles who would see the signs at an oblique angle from the end of Water Lane has been considered and regard has been made to the possible confusion with traffic or other signals. The Institution of Lighting Engineers Technical Report Number 5: Brightness of Illuminated Advertisements (2001) provides guidance for maximum luminance and suggests that in city centre locations, with high levels of nighttime activity, illuminated areas up to 10m² should have a maximum luminance level of 600 cd/m². The proposed signs will not exceed c250 cd/m² and therefore their brightness would not distract any road users, who would also not be directly facing the proposed signs, given the context of the application site. The proposed signs would not cause harm to the safety of pedestrians. There are also no highway signs which the proposed signs may interfere with, and the proposal signs are not considered to have an adverse impact on the safety and operation of the adjoining public thoroughfare.
- 5.14 It is considered that the proposed signs would not result in harm to visual amenity or public safety and would not cause harm to the character and appearance of the host building and the local street scene. The proposed signs will help ensure the continued economic use of this site and its continued function as an appropriate commercial use, which adds to the vitality and viability of the local area in general without compromising the visual amenities of the wider area.
- 5.15 The proposals involve the refurbishment and modest alterations at an existing public house community leisure facility within Richmond riverside. The alterations and refurbishment works are an essential part of the applicant's strategy to attract custom, to ensure the continued economic viability of this existing public house community social and leisure facility. The refurbishment and enhancement of this existing public house is necessary in order to help attract continued custom and facilitate the continuing economic health of the beneficial use of these listed premises. These proposals would help to facilitate the continuing beneficial and sympathetic use of these premises, which will continue to add to and enhance the vitality and pedestrian footfall within the local street scene and Richmond riverside in general.
- 5.16 The application premises provide an established and valued public house social and community leisure facility within Richmond riverside. In order to remain economically viable, commercial leisure uses will need to continue to update and enhance their customer offer and the proposed internal alterations and refurbishment works to the existing public house will support the economic viability of the existing continued use of these premises, which will continue to allow public access into these premises and would directly contribute to their continuing upkeep and maintenance. Furthermore, the application proposals would also help the applicant to ensure the continued economic viability of this existing commercial hospitality and leisure facility, that provides direct

and indirect employment and generates local economic activity. As with all commercial hospitality and leisure facilities, the applicant needs to continually refresh and enhance its customer offer and attraction at this public house, in order to remain commercially viable. The continued commercial viability of these commercial hospitality and leisure premises ensures the continuing maintenance and upkeep of this listed building for a publicly accessible use. The application proposals should be considered as a key element of this ongoing investment by the applicant into the viability, maintenance and upkeep of these listed premises. The application proposals are therefore linked to the enhancement and refurbishment of an existing community leisure facility within Richmond riverside and would directly support the aims and aspirations of paragraphs 96 and 97 of the December 2023 Framework. The application proposals would therefore directly help to meet the economic and social needs of the local community.

- 5.17 During the continuing difficult economic climate, post pandemic and during the current cost of living crisis for its customers and staff, the application site has suffered from lost revenue and the application proposals have been designed as a key element of the applicant's investment into improving customer facilities at these premises, to attempt to attract more customers to the site and enhance its economic well-being. It is important that the site enhances, updates and improves upon its customer offer and attraction, otherwise the site could continue to suffer serious detrimental effects on the ability to attract customers, thereby subsequently further affecting sales and viability to the detriment of the continued economic vitality of the public house. Both full and part-time staff are employed at these premises and are reliant on it for their income. Any continued drop in sales will affect the ability of the unit to maintain current staff levels. The LPA should therefore use its best efforts to support the recovery of their own hospitality and leisure sector in this regard.
- 5.18 The site is already in use as a public house and the application proposals do not involve any change of use of these premises. The existing public house use of the application site would therefore continue, and the application proposals would simply improve customer facilities for the existing use. Consequently, it is considered that there would be no net material impact upon the amenities of neighbouring properties, over and above that which already exist at the site and therefore no conflict with the general amenities of the area would arise.
- 5.19 For the reasons rehearsed above and within the accompanying Heritage Statement, the application proposals are therefore considered to be compliant with the requirements, aims and aspirations of the December 2023 Framework, Policy HC1 of the London Plan; and Policies LP1 and LP3 of the Richmond Local Plan. Furthermore, there is no conflict with the requirements of Policy LP18 of the Richmond Local Plan. In accordance with the December 2023 Framework's presumption in favour of sustainable development, these applications should be approved without delay.

6.0 Summary

- 6.1 The proposed internal alterations and refurbishment works, together with external signage and repainting, are considered to be sympathetic in design, form and materials and are modest and appropriate in nature and scale. No elements of historic fabric are proposed to be lost and the existing plan form of the premises is not significantly further affected. None of the features specifically addressed within the Historic England listing description are affected by the application proposals.
- 6.2 The proposed works are therefore considered to be sympathetic to the historic and architectural significance and character and fabric of these listed premises. The internal proposals, along with the external signage and repainting, are fully reversible when no longer required and comply with conservation best practice.
- 6.3 The external works proposed as part of the application scheme are confined to replacement signage and the repainting of the ground floor window frames. These elements of the proposals should be considered simply part of the applicant's on-going maintenance of these elements these premises. The design and form of the replacement signage is respectful of the host premises and is similar to that which it would replace. Furthermore, the external painting is appropriate in colour. Consequently, the implications for the external character, appearance and fabric of the host premises themselves, along with their contribution to the character and appearance of this part of the designated conservation area, are considered to be acceptable and sympathetic. The settings of the neighbouring heritage assets are also respected and preserved by the external signage and repainting works.
- 6.4 Given the nature of the proposed works, with no below ground excavations proposed, there are no implications for any archaeological remains at and around the site.
- 6.5 In the case of the application proposals, it is considered that less than substantial harm would be caused to the character, appearance, setting and the historic fabric of this listed public house. Furthermore, due to the nature of the proposals, it is considered that there would be no unacceptable implications for the settings of neighbouring heritage assets and the character and appearance of the designated conservation area.
- 6.6 Given their positioning overlooking the pedestrianised area at the end of Water Lane, adjacent to the river Thames, the proposed signs will be clearly visible to pedestrians and other users of these routes. However, the proposed signs have been designed to closely match the size, positioning and illumination method of the existing signs which they are to replace. The signs are thought to be visually compatible with the established appearance of the building's riverside frontage and its wider visual context. It is considered that the proposed signs would not result in harm to visual

amenity or public safety and would not cause harm to the character and appearance of the host building and the local street scene. The proposed signs will help ensure the continued economic use of this site and its continued function as an appropriate commercial use, which adds to the vitality and viability of the local area in general without compromising the visual amenities of the wider area.

- 6.7 It is also considered that the applicant has genuine and reasonable requirements to undertake these proposed works, in order to safeguard the economic well-being of the existing beneficial use of these listed premises, for its established use, for a use that allows public access into them, and which ensures the on-going maintenance and upkeep of the premises. These are significant public benefits derived from the application proposals.
- 6.8 As with all commercial hospitality and leisure facilities, the applicant needs to continually refresh and enhance its customer offer and attraction at this public house, in order to remain commercially viable. The continued commercial viability of these commercial hospitality and leisure premises ensures the continuing maintenance and upkeep of this listed building for a publicly accessible use. The application proposals should be considered as a key element of this ongoing investment by the applicant into the viability, maintenance and upkeep of these listed premises.
- 6.9 The LPA should therefore use its best efforts to support the recovery of their own hospitality and leisure sector in this regard.
- 6.10 The application proposals are therefore considered to be compliant with the requirements, aims and aspirations of the December 2023 Framework; Policy HC1 of the London Plan; and Policies LP1 and LP3 of the Richmond Local Plan. Furthermore, there is no conflict with the requirements of Policy LP18 of the Richmond Local Plan. In accordance with the December 2023 Framework's presumption in favour of sustainable development, these applications should be approved without delay.

7.0 Design and Access Statement

- 7.1 The application proposals comprise internal alterations and refurbishment/redecoration works, together with external signage and repainting at an existing public house at the Slug & Lettuce, Water Lane, Richmond, TW9 1TJ. The Town & Country Planning (Development Management Procedure) (England) (Amendment) Order 2013 requires a Design & Access Statement for these works. Government advice is clear that the level of detail in a Design and Access Statement should be proportionate to the complexity of the application but should not be long.

Amount

- 7.2 The application proposals amount to a modest scheme of works at this existing public house, as described in Section 3.0, summarised above in paragraph 7.1 and as detailed in the accompanying plans. The proposed internal works include: alterations to and extension of the existing bar servery; new timber wall panelling; new flooring; new lighting and electrical fittings; the refurbishment of customer toilets; the removal of an existing display unit; and redecoration and refurbishment throughout. In addition, the application proposals include replacement external signage, comprising two externally-illuminated over-entrance signs, together with external repainting of the ground floor window frames.

Layout

- 7.3 The existing layout of the premises themselves is generally unaffected by the proposed works. The proposals would not materially affect circulation around the internal accommodation of the public house itself. The proposals are considered to enhance the existing customer facilities provided at this public house facility. Overall, these changes do not result in any significant impacts upon the general layout of the premises and the areas of public access. The application proposals are considered to be sympathetic and appropriate in nature.

Scale

- 7.4 The application proposals do not impact upon the existing scale of the application premises and, instead, they enhance existing facilities provided at these public house premises.

Landscaping

- 7.5 The application proposals do not impact upon the existing hard and soft landscaping at the application premises.

Appearance

- 7.6 The external appearance of the premises themselves would be generally unaffected by the application proposals. The external works proposed as part of the application scheme are

confined to external signage and repainting works. These elements of the proposals should be considered simply part of the applicant's on-going maintenance of these elements these premises. The design and form of the replacement signage is respectful of the host premises and is similar to that which it would replace. Furthermore, the external painting is appropriate in colour. The internal appearance of the application premises would be enhanced by the full redecoration, whilst the internal alterations and fittings would respect the internal appearance of the premises. For the reasons rehearsed within the accompanying Planning Support Statement and Heritage Statement, the proposals are considered to be sympathetic and appropriate in nature.

Use

- 7.7 The use of the application premises would remain unaltered as a public house. The application proposals will enhance customer facilities at the application site and refresh and refurbish the internal appearance of the premises themselves. The application proposals are to refresh, enhance and improve customer facilities provided at this site, in order to help facilitate the on-going economic viability of this existing beneficial and established use of this listed building. The existing public house use of this site comprises a beneficial and appropriate use of these listed premises and the continued use as such allows for public access into and around these listed premises. Public access into these listed premises would therefore continue.

Access

- 7.8 Access arrangements into and past the premises would not be altered as a result of the application proposals.

8.0 Heritage Statement

Historic Context

- 8.1 The application site comprises existing public house premises located in Water Lane, Richmond. The application premises themselves are grade II listed. The application site lies within the designated Richmond Riverside Conservation Area. The Historic England listing description for these premises read as follows:

C18 building, 3-storeys high in stock brick with pantile roof. Five windows wide on Water Lane frontage and 3 windows wide on river frontage where there is also a central entrance door. Windows and door segmental headed. Sash windows retaining glazing bars.

- 8.2 Some of the neighbouring buildings are also listed. Nearest to the application site is the grade II listed White Cross Hotel, on Riverside. The Historic England listing description for this building is as follows:

Public house, early-mid C19, with extension of late-C19 to the north-west.

EXTERIOR: The early section of the brick building, dating from the 1820s or 1830s, has two main river frontages to the south-east and to the south-west, each of three storeys and three bays. The former has canted single storey bay windows on either side of central porch; the latter has one single storey bay window to right of the doorway with a stucco surround. The raised ground floor is stuccoed and there is a broad moulded string course, painted white, in between the second and third storeys. To the north-west is a stuccoed late C19 extension of two storeys and two bays, with an iron canopied balcony to the upper storey, and to the north-east is a lean-to single storey extension of the same date. There are two entrances to the building in the middle bay of each elevation and these signify the building as having origins as a public house, rather than a domestic building: that to the south-west is a grand Doric portico reached by a flight of stone steps which retain their C19 railings; that to the south-east is flanked by a pair of pilasters and also reached by steps running alongside the building. The hipped roof is partially concealed by the raised parapet which is painted white on the south-east elevation and bears C20 lettering.

INTERIOR: The pub retains a coherent C19 interior with many original features including a stone surround to an unusually-placed fireplace underneath a window, a mantelshelf, the central bar including over-bar with sliding sashes (a rare feature) and back bar, cornices, a deep-moulded picture rail, architraves and an early C19 staircase with simple moulded newel posts and stick balusters. The original division of the space is readable in the ceiling beams which indicate the smaller rooms the ground floor once comprised, which would have offered public saloons, private rooms for customers and space for off-sales of alcohol. The rooms on the first floor retain some

early C19 panelling, doors, architraves, cornices and a single fireplace with original grate and wooden surround in a fluted design with classical paterae.

HISTORY: The White Cross Hotel, like the terrace alongside it, dates from the 1820s or 1830s. The two entrances, its corner position and its location on a travelling route near the bridge, suggest it was built as a public house; it is marked 'PH' on the first edition of the Ordnance Survey map for Middlesex in 1881. Between 1881 and 1896 the building was extended to the north-west although its footprint, and much of the interior, has changed little since.

SUMMARY OF IMPORTANCE: This public house dating from the 1820s or 1830s survives well: the principal elevations are largely unchanged, although some of the windows have been replaced, and include some good features including a Doric portico reached by stone steps. The pub is an important component of this historic stretch of riverside and has group value with the listed terrace alongside it (Grade II) and Richmond Bridge of 1777 (Grade I). The interior is also strong and there is a good degree of survival relating to the building's use as a public house from the early-mid C19, including relatively rare sliding sashes; the interior survival overall is of note as many pubs were rebuilt or converted in the great boom of pub building in the later C19 or have been refurbished in the century thereafter.

- 8.3 Richmond Riverside Conservation Area was first designated on 14/01/1969. It was subsequently extended on 05/07/1977, then again on the 07/09/1982 and again on 07/11/2005. The Richmond Riverside Conservation Area Appraisal was adopted on 20/11/2023. This states that the Richmond Riverside forms an important part of the historic settlement of Richmond, which has origins dating from the 14th century. The area is characterised by a mixture of development types, periods, and styles, most of which address or are associated with the Thames, ranging from robust, detached houses and villas with large gardens, to boathouses and workshops which remain actively used. There is a significant amount of public realm along the River allowing for its enjoyment and long views across and along the embankment are key to its character and appearance.
- 8.4 The Conservation Area Appraisal document specifically addresses Water Lane and states that the narrowness of the street and the tall buildings lining it on one side, in conjunction with the remaining warehouses at the river end, give Water Lane an industrial character at the lower end, while a surviving row of small houses from the original development of this street, in addition to some more recent small scale residential development and a public house, create a more residential character on the northern side of the upper end towards Hill Street.
- 8.5 The design guidance section of the Conservation Area Appraisal document states that painting is rare within the Conservation Area and introducing paint to unpainted properties will be resisted. Painting should only occur if the existing location has already been painted, and an appropriate colour should be selected to maintain the overall neutral palette of the Conservation Area. This document adds that there are a limited number of shopfronts within the Conservation Area and

most commercial premises are generally pubs and restaurants, which often employ many of the same elements of traditional shopfronts in their design. The quality of these premises are of a good quality with many good surviving historic elements. Signage should replicate traditional styles with painted or applied letters to the fascia and simple hanging signs. Modern signage, including corporate branding, internally illuminated projecting box signs, and plastic/box fascia signs, will be resisted.

Proposed Development

- 8.6 The application proposals comprise internal alterations and refurbishment/redecoration works, together with external signage and repainting at an existing public house at the Slug & Lettuce, Water Lane, Richmond, TW9 1TJ.
- 8.7 The proposed internal works include: alterations to and extension of the existing bar servery; new timber wall panelling; new flooring; new lighting and electrical fittings; the refurbishment of customer toilets; the removal of an existing display unit; and redecoration and refurbishment throughout. In addition, the application proposals include replacement external signage, comprising two externally-illuminated over-entrance signs, together with external repainting of the ground floor window frames. These proposals are detailed within the accompanying application drawings.

Assessment of Impact

- 8.8 The implications of the proposed internal alterations and refurbishment works, together with the external signage and repainting, on the historic significance, architectural fabric and character of these listed premises are considered to be acceptable and sympathetic. None of the features specifically addressed within the Historic England listing description are affected by the application proposals. It is considered that no significant, material detriment results to the historic fabric of these listed premises as a consequence of the proposed internal alterations and refurbishment works. The proposed internal alterations and refurbishment works are not considered to result in any significant, material or detrimental implications for historic or architectural significance, interest, character and fabric of these listed premises.
- 8.9 The proposed internal alterations and refurbishment works are considered to be modest and appropriate in nature and scale. The proposed works are reversible, in line with good conservation practice. The proposed works would have no significant nor detrimental impact upon the internal architectural and historic significance and character of the premises and would have no significant, direct impact upon historic fabric. The proposed internal alterations and refurbishment works are therefore considered to be sympathetic to the historic and architectural character of these listed premises and are not considered to genuinely conflict with any of the wider aspirations of the local planning policy context for this site.

- 8.10 The external works proposed as part of the application scheme are confined to replacement signage and the repainting of the ground floor window frames. These elements of the proposals should be considered simply part of the applicant's on-going maintenance of these elements these premises. The design and form of the replacement signage is respectful of the host premises and is similar to that which it would replace. Furthermore, the external painting is appropriate in colour. Consequently, the implications for the external character, appearance and fabric of the host premises themselves, along with their contribution to the character and appearance of this part of the designated conservation area, are considered to be acceptable and sympathetic. The settings of the neighbouring heritage assets are also respected and preserved by the external signage and repainting works.
- 8.11 Given the nature of the proposed works, with no below ground excavations proposed, there are no implications for any archaeological remains at and around the site.
- 8.12 In the case of the application proposals, it is considered that less than substantial harm would be caused to the character, appearance, setting and the historic fabric of this listed public house. Furthermore, due to the nature of the proposals, it is considered that there would be no unacceptable implications for the settings of neighbouring heritage assets and the character and appearance of the designated conservation area. It is also considered that the applicant has genuine and reasonable requirements to undertake these proposed works, in order to safeguard the economic well-being of the existing beneficial use of these listed premises, for its established and historic use, for a use that allows public access into them, and which ensures the on-going maintenance and upkeep of the premises. These are significant public benefits derived from the application proposals.
- 8.13 The refurbishment and enhancement of this existing public house is necessary in order to help attract continued custom and facilitate the continuing economic health of the beneficial use of these listed premises. These proposals would help to facilitate the continuing beneficial and sympathetic use of these premises, which will continue to add to and enhance the vitality and pedestrian footfall within the local street scene and Richmond riverside in general. The continued commercial viability of these commercial hospitality and leisure premises ensures the continuing maintenance and upkeep of these listed premises for a publicly accessible use. Any intransigence by the LPA about the proposals could have a serious detrimental effect on the economic viability of this public house and its ongoing beneficial, publicly accessible, use.
- 8.14 The implications of the application proposals on the historic significance, architectural fabric and character of these listed premises, together with the settings of neighbouring listed buildings and the character and appearance of the designated conservation area, are considered to be appropriate and acceptable. It is considered that no significant, material detriment results to any of the historic fabric of these listed premises as a consequence of the proposals. The application proposals are not considered to result in any significant, material or detrimental implications for historic or architectural significance, interest, character, fabric and setting of these listed

premises. The application proposals are therefore considered to be sympathetic to the historic and architectural character of these listed premises and are not considered to genuinely conflict with any of the wider aspirations of the local planning policy context for this site. In terms of their heritage impacts, the application proposals are therefore considered to comply with the aims and aspirations of the December 2023 Framework; Policy HC1 of the London Plan; and Policies LP1 and LP3 of the Richmond Local Plan.

- 8.15 It is considered that overall, the proposals do not amount to any significant alteration or impact to the historic significance of these heritage assets. The features identified within Historic England's Listed Buildings Register are unaffected by the application proposals. The proposals are considered to be modest and sympathetic and justified, in order to refurbish and enhance customer facilities at these listed premises, as part of the applicant's ongoing management, maintenance and upkeep of this public house. It is considered that no significant, material, detriment results to any significant historic fabric at these listed premises as a consequence of the proposals. No elements of historic fabric are proposed to be lost and the existing plan form of the premises is not significantly affected. The application proposals are considered to be compatible with the historic and architectural significance and character of these listed premises themselves.
- 8.16 The contribution that the application site makes to the settings of the neighbouring listed buildings and the character and appearance of the designated conservation area is preserved by the proposals, given their appropriate and modest nature. The character and appearance of the application site would therefore be preserved. The proposals would consequently preserve the contribution of the application site towards the settings of the neighbouring heritage assets and the character and appearance of the designated conservation area. It is therefore considered that the settings of the neighbouring heritage assets would be preserved by these proposals.
- 8.17 The existing, established and beneficial use of these listed premises would be unchanged and continued public access into and around them would also be retained. The application proposals will help to facilitate the continuing economic health of the beneficial use of these listed premises for their established and appropriate use, which would continue to add to and enhance the vitality and pedestrian footfall within the local street scene. Allowing the proposed works would therefore help retain and enhance the economic health and wellbeing of the applicant's existing active and beneficial use of these listed premises for their continued, established, existing and appropriate use.
- 8.18 No element of the application proposals is considered to be harmful to the overall significance, character and settings of these listed premises, the neighbouring heritage assets and the character and appearance of the designated conservation area; and it is considered that none of the historical elements referenced above will be harmed by the proposals, as required by

Section 16 of the December 2023 Framework. The impact of these works is therefore judged to be **negligible**.

8.19 Taking all of the above into account, it is considered that the identified designated heritage assets are respected by the proposals and no significant, material harm would result for the significance, character, appearance or settings of these premises themselves, nor the neighbouring heritage assets and the character and appearance of the designated conservation area. For the reasons rehearsed above, the application proposals are therefore considered to be compliant with the aims and aspirations of the December 2023 Framework; Policy HC1 of the London Plan; and Policies LP1 and LP3 of the Richmond Local Plan, as rehearsed above in Section 4.0 of this Support Statement, and therefore accord with the requirements of national and local adopted planning policy with regard to their heritage impacts. Furthermore, there is no conflict with the requirements of Policy LP18 of the Richmond Local Plan.

Mitigation Strategy

8.20 A holistic approach has been taken in formulating the strategy for the application proposals. The proposals involve only a minimal amount of physical intervention into the fabric of these listed premises and do not affect its historic plan form.

8.21 It is considered that as part of the requirement identified in Section 16 of the December 2023 Framework, the level of detail provided within this statement is proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposals on their significance. It is for the LPA, as identified in Section 16 of the December 2023 Framework, to identify and assess the significance of this asset and how it might be affected by the proposals outlined above and within the submitted plans.

8.22 The December 2023 Framework requires that heritage assets are conserved in a manner appropriate to their significance (paragraph 195). Heritage assets should be put to viable uses consistent with their conservation and development should make a positive contribution to local character and distinctiveness (paragraph 196). Development proposals should avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal (paragraph 201). In determining applications, LPAs should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 203). When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (paragraph 205). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (paragraph 206).

Where a development would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (paragraph 208).

8.23 The application proposals are considered to be the minimum required to provide the necessary refurbishment and enhancements of the customer facilities within the existing public house accommodation, to assist with the necessary enhancement of the customer facilities at this commercial hospitality and leisure facility, to help ensure that it is worthy of being frequented for many more years to come. It is also considered that there are public benefits in allowing the proposals to be undertaken, as already rehearsed above. Consequently, any (certainly less than substantial) harm caused by the proposals would be outweighed by these public benefits. The public benefits are therefore considered to outweigh any material harm to these designated heritage assets. Furthermore, given that the application proposals will respect and modestly enhance the internal and external appearance of these listed premises, and will not materially affect the settings of neighbouring heritage assets and the character and appearance of the designated conservation area, the proposals are considered to be in compliance with the overall aims and objectives outlined in the December 2023 Framework; Policy HC1 of the London Plan; and Policies LP1 and LP3 of the Richmond Local Plan.

8.24 With the above in mind, it is considered that the application proposals accord with the December 2023 Framework's presumption in favour of sustainable development (paragraph 11) which requires development proposals that accord with an up-to-date development plan to be approved without delay and where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless in conflict with the December 2023 Framework.

8.25 The December 2023 Framework also requires LPAs to approach decisions on proposed development in a positive and creative way and to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible (all paragraph 38). Listed building consent and advertisement consent should therefore be granted, as there are no adverse impacts of doing so that would significantly and demonstrably outweigh the benefits, when assessed against the requirements of Section 16 of the December 2023 Framework and the local planning policies taken as a whole.

Conclusion

8.26 This Heritage Statement has identified that there would be potential effects arising on several designated heritage assets; namely the grade II listed premises themselves at the Slug & Lettuce, Water Lane, Richmond, TW9 1TJ, and also the neighbouring heritage assets, including White Cross Hotel, on Riverside (grade II listed). In addition, the potentially affected heritage assets include the character and appearance of the Richmond Riverside Conservation Area. By

analysing the significance of the individual assets and then considering the effect of the proposals on that significance, the impacts of the proposals have been assessed.

- 8.27 We have found that there would be a **negligible** effect upon the significance, character, appearance and settings of these heritage assets resulting from the proposals. This is due to the application proposals being modest and appropriate in extent and sympathetic to the historic and architectural significance, character and settings of these heritage assets. Overall, the application proposals would cause no measurable impacts upon these heritage assets that would cause irreversible harm or harm which is not of an ephemeral nature.
- 8.28 We are therefore satisfied that special attention has been paid to the desirability of preserving or enhancing the character and appearance of all of these identified heritage assets and their settings, in accordance with Section 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990.

