



**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

HERITAGE, DESIGN & ACCESS STATEMENT

**APPLICATION FOR FULL PLANNING PERMISSION & LISTED BUILDING
CONSENT FOR REPAIR WORKS TO GRADE II* CURTILAGE LISTED WALL
ASSOCIATED WITH GORDON HOUSE**

**EAST SIDE OF ST MARGARET'S ROAD BETWEEN KILMOREY ROAD AND TALBOT
ROAD, TWICKENHAM, TW1 1PS**

August 2024



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1. Introduction

1.1. This Heritage, Design & Access Statement is prepared on behalf of Richmond Lock Management Limited (*“the applicant”*) in support of an application for full planning permission & listed building consent for repair works to a grade II* curtilage listed wall associated with Gordon House. The wall is located on the east side of St Margaret’s Road between Kilmorey Road in the south and Talbot Road in the north.

1.2. The full description of the proposal is as follows:

“Repair works to full extent of grade II curtilage listed boundary wall in matching materials and matching bond”*

1.3. This Statement sets out the justification for the proposed development by reviewing the site and surroundings as well as summarising the relevant planning history. It will then demonstrate how the proposal complies with both national and local planning policies and that the proposed repair works would preserve and enhance the heritage asset.

1.4. This statement should be read in conjunction with the following supporting information:

- Application Form and Ownership Certificate;
- Heritage Statement (within this statement);
- Design and Access Statement (within this statement);
- Brief Specification for repairs to boundary wall, prepared by EBW Consultancy Ltd;
- Plans and drawings, prepared by WOW Architects:
 - o Site Location Plan (drg no. SLP – 01)
 - o Existing Block Plan (drg no. BP – 01)
 - o Detail Plan (drg no. DET - 01)
 - o Existing Elevations Part 1 (drg no. EX - 01)
 - o Existing Elevations Part 2 (drg no. EX - 02)
 - o Existing Elevations Part 3 (drg no. EX - 03)
 - o Existing Elevations Part 4 (drg no. EX – 04)

- Existing Elevations Part 5 (drg no. EX – 05)
- Proposed Elevations Part 1 (drg no. GA – 01)
- Proposed Elevations Part 2 (drg no. GA – 02)
- Proposed Elevations Part 3 (drg no. GA – 03)
- Proposed Elevations Part 4 (drg no. GA – 04)
- Proposed Elevations Part 5 (drg no. GA – 05)

2. Site and Surrounding Area

- 2.1. The application site comprises a 207-metre-long grade II* curtilage listed wall which runs along the eastern side of St Margaret’s Road (A3004). The full extent of the wall runs from Kilmorey Road which branches off to the east side of St Margaret’s Road, to Talbot Road, which branches off to the west side of St Margaret’s Road, as shown in red on **image 1** below.



Image 1: Aerial image showing the site (source: Google Maps).

- 2.2. The wall is curtilage listed as it forms part of the boundary of the grade II* listed Gordon House, which is shown in image 1 to the east of the boundary wall. The house and grounds of Gordon House date from 1720. To the north of the application site the wall continues and wraps around the junction of St Margaret’s Road and Railshead Road, heading down to Gordon House. The walls are not specifically mentioned in the listing description, but historic maps show that they formed the boundary of Gordon House, and Richmond Council have advised that listed building consent is therefore required for any works effecting the walls.

- 2.3. **Image 2** shows the ‘Lions Gate’ gated entrance into the estate. This is located about halfway between Kilmorey Road and Talbot Road.
- 2.4. **Image 3** shows the wall, subject of the application, on the left-hand side of the image. The image is taken approximately from the Lions Gate looking southwards down St Margaret’s Road. The wall varies in height all along its full length, and sits adjacent to the footpath alongside the road which runs from south-north.



Image 2: Aerial image showing the site (source: Google Streetview).



Image 3: Aerial image showing the site (source: Google Streetview)

2.5. **Image 4** below shows an extract from the Historic England listed buildings search map. Although the wall itself is not marked as being listed, the Council have confirmed it is part of the boundary walls of the grade II* Gordon House, and is therefore curtilage listed. The second marker which isn't labelled, and sits adjacent to the northwest of Gordon House, refers to the grade II listed former stable block associated with Gordon House. Aside from these two properties there are no other listed buildings near to the site. There are also a significant amount of non-listed buildings between Gordon House and the curtilage listed wall, subject of the application.

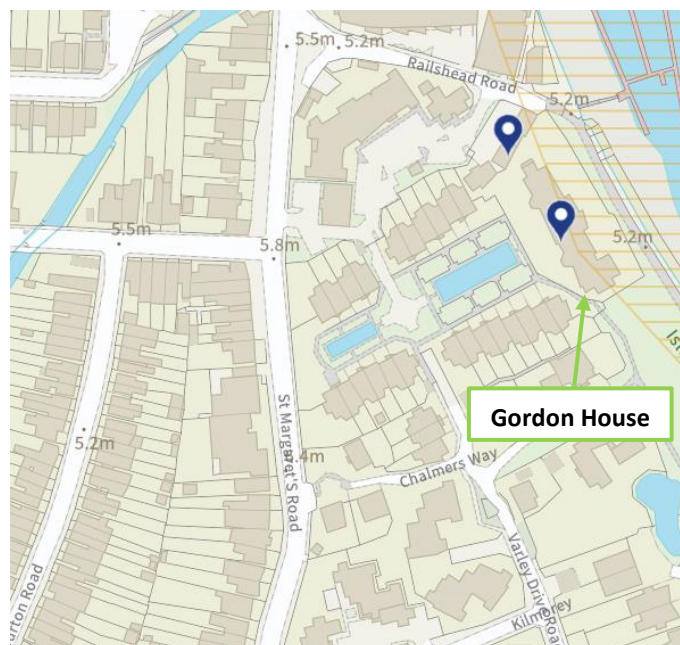
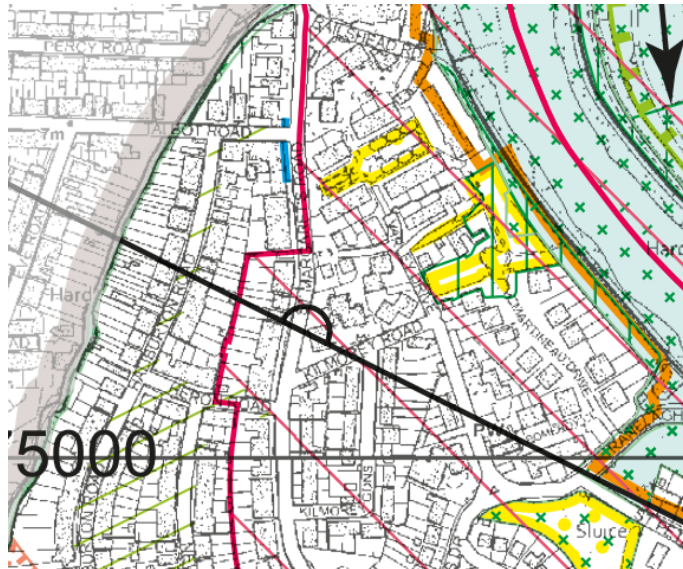


Image 4: Map showing the location of nearby Listed Buildings (Source Historic England; <https://historicengland.org.uk/listing/the-list/map-search>)

2.6. The Council's Policies Map has been researched and an extract of the map showing the application site is shown in **image 5**. The site is not subject to any ecological or environmental designations.

2.7. The extract shows that the application site is within the St Margaret's Estate Conservation Area (19), designated in 1971. The Conservation Area is situated to the west of Twickenham Bridge and straddles the Chertsey Road. It adjoins Richmond Riverside (4) and Old Deer Park (57) conservation areas to the East.



 Conservation Area (as at February 2019) LP3

Image 5: Extract from Richmond Council planning policies map

- 2.8. Part of the site to the northern section of the wall falls within Flood Zone’s 2 and 3 (shown in **image 6** below) and is therefore at medium/high risk of flooding according to the EA.

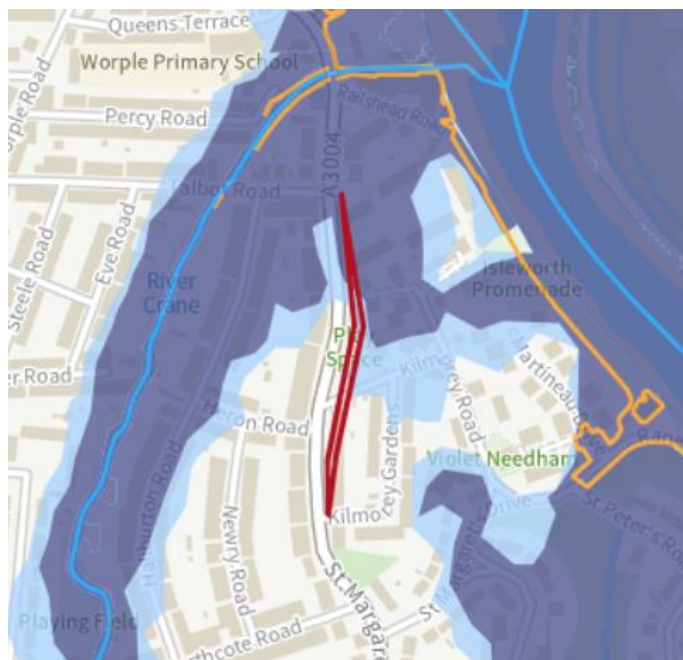


Image 6: Map showing Flood Risk (Source: EA Flood Risk Map for Planning; <https://flood-map-for-planning.service.gov.uk/location>).

3. The Proposal (Design & Access)

- 3.1. This application seeks full planning permission and listed building consent for repair works to a grade II* curtilage listed wall associated with Gordon House. The accompanying existing and proposed drawings show the full extent of the wall and include the EBW Consultancy Ltd proposals to repair it.
- 3.2. The proposed works will involve repairing the full extent of the wall in matching materials and matching bond, and clean and repair the main Lions Gate entrance including brick repair, stone plinth and stone decorative features cleaning and repair. The site location is shown below in red, in image 7 (extract from drawing no. SLP 1).



Image 7: Site Location Plan (drawing no. SLP 1)

Design Principles

Use

- 3.3. The application site is a boundary wall associated with Gordon House and runs around many residential properties to the east of the wall. The use of the wall would remain as existing, and only repair work is proposed.
- 3.4. The full description of the development is as follows:

“Repair works to full extent of grade II curtilage listed boundary wall in matching materials and matching bond.”*

Amount

- 3.5. The total length of the wall on the application site is approximately 207m. A variety of repair works are proposed to the full length of the wall including removing vegetation, replacing defective bricks, fixing the defective brick piers, removing vegetation and cleaning bricks on the Lion's Gate entrance, and brush cleaning all brickwork surfaces on completion.
- 3.6. In addition, it is proposed to carry out repointing from pavement level to a height of 12no courses, rake out by hand all mortar to a min 20mm depth and repoint along a provisional length of 150m.
- 3.7. Finally, it is proposed to take down brick on edge capping and 7no. courses below and rebuild in matching brick, along a provisional length of 53m.

Scale & Massing

- 3.8. The boundary wall is of varied height and depth. It includes piers and some wall construction with upper tapering. The depth and height of the wall would not alter as a result of the proposals, therefore the scale and massing would remain the same.

Appearance

- 3.9. A photo montage of the existing wall is provided within the drawing pack and an extract showing images of the wall is shown below in **image 8**. The appearance of the wall would be improved by the repair works, as currently some sections of the wall are in a poor condition.
- 3.10. The proposed repair works will use the same materials to those used on the existing wall, including:
- Red heritage brickwork and lime mortar pointing;
 - Stone repair mortar; and
 - Yellow heritage brick to match banding to lions gate entrance.



Image 8: Images of the existing wall (drawing no. DET01)

Access

- 3.11. The wall abuts the public highway, which lies to the west, and so access can be achieved from there. It can also be achieved from the land behind the wall (to the east) which is owned by the Estate. The wall has one access point through it, the Lion's Gate (image 2).
- 3.12. The plan for repair works to the wall would be to erect scaffolding, working platforms, and protected enclosures to allow access to working areas and to maintain safety of operatives, the public and motor vehicles. The adjacent public footpath would also be protected from mortar droppings.

4. Planning History

- 4.1. Following a review of Richmond Borough Council's Planning Search, there have been no relevant applications found.

Pre-application Advice

- 4.2. The applicant was advised by the Council in an email dated 24 June 2024 that:

"Urban Design have confirmed

The boundary walls which run along the east side of St Margarets Road and then up and around Railshead Road form part of the original boundary of Gordon House and therefore would be curtilage listed as part of Gordon House as shown on statmap. The walls are not specifically mentioned in the description but historic maps certainly show that they formed the boundary of the house. Given the size of the walls and the fact that they front a highway, taking them down would also need PP as it is demolition in a CA.

Planning permission and listed building consent is necessary to be obtained before this work can be undertaken."

- 4.3. As a result of this advice this application has been submitted for full planning and listed building consent.

5. Heritage Statement

- 5.1. The plan-led approach to development, as enshrined by Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to accord with the adopted Development Plan unless material considerations indicate otherwise.
- 5.2. 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.
- 5.3. 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.
- 5.4. For the purposes of this statement, preservation equates to an absence of harm. Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.
- 5.5. 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.
- 5.6. 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.”

National Planning Policy Framework (as amended December 2023)

5.7. The National Planning Policy Framework (NPPF) and its associated Planning Practise Guidance (PPG) are relevant material planning considerations for determining any planning application.

5.8. The NPPF states at **Paragraph 7** that the purpose of the planning system is to “contribute to the achievement of sustainable development” with the three objectives of sustainable development being ‘economic, social and environmental’.

5.9. **Paragraph 8** of the Framework defines these three objectives as:

- *“An economic objective – to help build o help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing; and*
- *An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

5.10. **Paragraph 10** of the NPPF advises that so that sustainable development is pursued in a positive way, at the heart of the framework is a presumption in favour of sustainable development. For

decision-taking this means: approving development proposals that accord with an up-to-date development plan without delay.

- 5.11. **Paragraph 11** sets out the presumption in favour of development that should be applied by local planning authorities in assessing and determining development proposals and in so doing, development proposals which accord with the development plan or where the plan is absent, silent or out of date should be approved without delay.
- 5.12. **Paragraph 38** of the NPPF states that local planning authorities should “*approach decisions on proposed development in a positive and creative way*” and directs decision-takers at every level to “*seek to approve applications for sustainable development where possible*”. Local planning authorities are required to “*work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area*”.
- 5.13. The NPPF requires the impact on the significance of a designated heritage asset to be considered in terms of either “substantial harm” or “less than substantial harm” as described within **paragraphs 207 and 208** 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.
- 5.14. **Paragraphs 205 and 206** 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.

The Development Plan

- 5.15. For the purposes of this planning application, the Development Plan of the London Borough of Richmond upon Thames comprises the following documents for consideration:
- Richmond Local Plan (adopted 2018); and
 - Draft Publication Richmond Local Plan.
- 5.16. The Council are currently preparing a new Local Plan for Richmond borough which will replace the current Local Plan. the emerging Local Plan carries limited weight as it has not been

adopted and so the 2018 Local Plan contains the main policies on which this proposal is assessed.

5.17. The following policies are considered relevant for this application. It should be noted that for brevity, the list below summaries the policy text:

5.18. Local Plan **Policy LP1** requires:

“All development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area“.

5.19. Local Plan **Policy LP3** states that:

“The Council will require 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“.

5.20. Local Plan **Policy LP8** states that:

“All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties“.

5.21. Local Plan **Policy LP21** states that:

“All developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.“

Supplementary Planning Documents

- 5.22. There are two Supplementary Planning Documents (SPDs) of relevance which are 'Listed Buildings' and 'Conservation Areas'.

London Plan 2021

- 5.23. The main policies applying to the site are:

Policy HC1 Heritage conservation and growth; and

Policy D4 Delivering good design.

- 5.24. These policies can be found at: <https://www.london.gov.uk/what-we-do/planning/london-plan>

- 5.25. The official listing entry (List Entry Number: 1240076) for the Grade II* listed Gordon House is as follows. It is noted that the boundary walls are not mentioned in the listing description:

“Probably circa 1720, altered circa 1865. 2 storeys stock brick with lavish red rubbed brick dressings. 5 windows, sashes, no glazing bars. Central Corinthian columned painted stone staircase with round-headed window over in elaborate stone surround. Stone cornice over. Full height rusticated pilasters with capitals to outer corners of front. Parapet. Slates. C19 chimneys. 2-storey 2 window extension to right, probably C18. Further extension to right 2-storey large canted brick bay, balustrade parapet. Probably late C18. Nearly matching extensions repeated to left of main front, probably C19. River Front - circa 1720. 2 storeys, yellow brick with red dressings. 5 sashes, no glazing bars. Stone cills on brackets. Central 1st floor round-headed window with key block and coved cornice on consoles going right across. Rusticated pilasters at angles with capitals and bases. Panelled parapet. C19 pediment over C19 lower extensions to right. C19 brick porch. 2-storey stock brick part to left, added in 1758 by Robert Adam. 3 sashes. Architrave surrounds and pediments on consoles. No glazing bars. Greek key band. Upper part C19. C19 chimneys. Slate roof. 6 bay extension to right, round-headed window on ground floor. Segmental arch to windows over. Cornice. Heavy oak

dentilled cornice to ceiling of upper floor. Interior - main block ground floor. Front part of house, former entrance hall, now divided up into passage and rooms, remains only of original panelling and ceiling cornice. Staircase hall, overlooking river, with very handsome original oak staircase on grand scale on 2 walls, rising to a broad landing round the other two. 2 balusters to each tread, cut strings with panelled ends and panelled soffit. Opening out of staircase hall on river front South West end is the present conference room, designed by Robert Adam as a drawing room for General Bland in 1758. It is probably Robert Adam's earliest surviving work in England and of the finest quality. Long rectangular room surmounted by modillioned cornice from which springs a ceiling with boldly coved sides all elaborately decorated with scroll work and oval panels. Plain oval centre except for central rose. Greek key pattern to border moulding of ceiling. Very fine chimney piece, now painted over. Fine consoles supporting blocks with lion masks. Central frieze with floral swags; centre block with military trophy. Carved wood doorcases consisting of bold quarter round mouldings. The Ionic columned and pedimented doorcases in the Adam drawing do not exist; nor does the upper tier of the chimney piece. No dado; modern skirting. History The house dates from about 1720 and was altered in 1758 by General Bland to the designs of Robert Adam. See drawings reproduced in "Robert Adam and his circle" by John Fleming, 1962, and others in Sir John Soane's Museum. Formerly called Seaton House. It was later purchased by William IV for his daughter, Lady Augusta FitzClarence, wife of Hon John Kennedy Erskine. She subsequently married Lord John Frederick Gordon. It was subsequently owned by T.C. Haliburton (1796-1865) - author of "Sam Slick". (See Dictionary of National Biography) and was bought by the then Lord Kilmorey in 1865 who carried out extensive alterations. Used as a school for the daughters of naval officers, when the chapel was built. Setting In garden on bank of River Thames. Modern training college buildings nearby.

Listing NGR: TQ1669375276."

5.26. The key issues for consideration are:

- i Impact on Local Character and Heritage Assets (St Margaret's Conservation Area and Gordon House)
- ii Impact on Neighbour Amenity
- iii Flood Risk and Basement Development

5.27. These issues are now considered, as follows.

Impact on Local Character and Heritage Assets (St Margaret's Conservation Area and Gordon House)

5.28. The application site is located within the St Margaret's Estate Conservation Area and is curtilage listed by virtue of its historic association with Gordon House.

5.29. The Conservation Area comprising the residential estate was developed from 1854 following the advent of the railway in the early 1850s. The house and grounds of Gordon House date from 1720. Borough boundary changes in 1994 brought the entire estate within the London Borough of Richmond upon Thames, also including the grounds of Gordon House and industrial sites adjacent to the River Crane.

5.30. The area between the application site and Gordon House has been developed for housing and so there is no visual intervisibility between the wall and its host listed building. Nevertheless the wall makes an important contribution to the character of the conservation area. The development proposal would ensure the wall is repaired in a like-for-like manner, with matching materials and bonding. This will ensure the long-term preservation of the heritage asset.

5.31. The proposal is considered to be in accordance with **Policy HC1** and **Policy D4** of the Richmond Local Plan (adopted 2018).

Impact on Neighbour Amenity

- 5.32. The wall abuts the estate to the east which contains residential houses and apartments at Corsellis Square, Chalmers Way and Varley Drive. The wall is being repaired in a like-for-like manner and ensuring the wall's existence and structural integrity will be to the benefit of residents in the locality for security and aesthetic reasons. There would be minimal disruption whilst the wall is repaired with some limited closure of the adjacent footpath likely.
- 5.33. The proposal is considered to be in accordance with **Policy LC8** of the Richmond Local Plan (adopted 2018).

Flood Risk and Basement Development

- 5.34. Part of the site to the northern section of the wall falls within Flood Zone's 2 and 3 (shown in image 6) and is therefore at medium/high risk of flooding according to the Environment Agency.
- 5.35. The development proposal is not for a development which would be "highly vulnerable" in the flood zone, and the repair work would not alter the extent or height of the listed wall.
- 5.36. The proposal is therefore considered to be in accordance with **Policy LP21** of the Richmond Local Plan (adopted 2018).

6. Summary and Conclusion

- 6.1. The proposal is for full planning permission & listed building consent for repair works to a grade II* curtilage listed wall associated with Gordon House. The wall is located on the east side of St Margaret's Road between Kilmorey Road in the south and Talbot Road in the north.
- 6.2. This Heritage, Design and Access Statement prepared by Rackham Planning and the drawing pack prepared by WOW Architects confirm that the proposal is wholly compliant with both adopted policies in the Richmond Borough Council Development Plan and the NPPF.
- 6.3. This proposal would secure the long-term viability of the listed wall by repairing it with like-for-like materials, and improving its structural integrity for the future. It would not adversely impact local residents, and would indeed assist in providing a secure boundary wall.
- 6.4. For these reasons the proposal is considered entirely acceptable, in accordance with the Development Plan and should therefore be granted full planning permission without delay.