



Historic England

Our ref: PL00029357

Spatial Planning & Design
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By email: LocalPlan@richmond.gov.uk

21 July 2023

Dear Spatial Planning & Design Team

London Borough of Richmond – Regulation 19 Consultation on draft Local Plan

Thank you for the opportunity to comment on the above consultation document as well as our recent meeting to discuss certain areas of the emerging Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Richmond through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if it therefore sets out a positive strategy for its conservation and enjoyment (para 185).

As with the previous consultation version of the draft Plan, we note and welcome the approach to the historic environment within the plan, both in a cross-cutting sense and with regard to specific policies. Our comments on this consultation draft are therefore limited in nature and principally relate to detail around individual policies and are designed to ensure that the draft Plan is fully justified, effective and in conformity with national and regional planning policy in terms of the NPPF's test of soundness. We also welcome a number of



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amendments made to the draft Plan in response to our previous consultation letter, including those within policy 29 Designated Heritage Assets and policy 31 Views and Vistas.

Chapter 16

We support the intention behind the policies and text in Chapter 16 of the draft Plan in addressing the challenges of climate change on the borough. It is important to emphasise that Historic England recognises the urgent need for positive action to tackle climate change and is committed to achieving net zero. As an organisation we have a duty of care to protect our heritage. We actively seek and promote actions that address the causes of climate change and that reduce greenhouse gas emissions.

However, it would be helpful within Chapter 16 to make clear that inappropriate while well-intentioned retrofit measures to historic buildings may not only adversely affect heritage significance but could also worsen rather than reduce carbon emissions. We therefore recommend that policy 4 makes clear that refurbishment/retrofitting projects to improve energy efficiency will also need to satisfy the requirements of policies elsewhere in the plan dealing with change to heritage assets. This could also be underpinned by explanatory text in Chapter 16 that sets out the following approach to such measures:

- The importance of ongoing maintenance as a method of both monitoring energy performance of existing buildings and ensuring its effectiveness
- Adopting an approach that as a starting point is iterative and looks for lower cost and minimally invasive interventions
- Emphasising that small scale changes, such as secondary glazing and window and door repair, can deliver significant benefits

Policy 32 – Royal Botanic Gardens, Kew World Heritage Site

We fully support the objective of the policy to protect, conserve, promote and enhance the World Heritage Site. We would however recommend that the reference to the Outstanding Universal Value (OUV) should be within the main body of clause A to make clear that this is the central purpose of the policy in question – ie conserving its heritage significance. This



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would align with policy HC2 which requires development plans to conserve and actively protect the OUV of world heritage sites.

We would also reiterate our previous comment that the policy should make clear that development proposals that would have an impact on the WHS will require a Heritage Impact Assessment upon application – further details can be found at [World Heritage Centre - Guidance and Toolkit for Impact Assessments in a World Heritage Context 2022 \(unesco.org\)](https://www.unesco.org/en/heritage/whc/guidance).

Policy 45 – Tall and Mid-Rise Buildings

As with our previous consultation response, we support this policy and consider that it is appropriately underpinned by relevant and up to date evidence in the form of the Urban Design Study. We would again however recommend that the policy should refer in bullet point 1 to a need to ‘avoid harm’ to heritage assets rather than to ‘respect the views and vistas’ towards them. This wording is clearer and therefore more effective.

We would also suggest that areas identified as appropriate for these buildings at appendix 3 continue to contain a degree of ambiguity, both in terms of boundaries and the colour coding within them. While we appreciate that a degree of flexibility is helpful in certain situations, in the interests of clarity and as per para 16d of the NPPF, we consider that a greater degree of precision is needed in relation to a number of draft site allocations. This is in order to properly understand the potential impacts on heritage assets and to avoid any harm.

Site allocations

We welcome the greater level of detail in relation to the existing context of each of the site allocations, including the identification of relevant heritage assets, as well as references to other evidence and guidance such as the Urban Design Study and SPDs. On the whole, we consider these set an appropriate framework to guide development proposals for the majority of the allocations.

However, for a limited number of the draft allocations in the most sensitive locations we consider there remains some further work to be done to ensure that heritage significance is



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properly reflected in the allocation policies and therefore conserved and where possible enhanced. As set out in Historic England's advice note on this subject (see [here](#)), understanding what contribution the wider site in its current form makes to heritage significance and then assessing what the allocation would have on that significance is an important starting point. This can then be used to inform development parameters and site capacities that avoid harm and identify opportunities for enhancement. This approach also aligns with London Plan policy D3 Optimising Site Capacity and its associated [guidance](#).

We note the assessments, analysis and guidance that has been undertaken and/or produced and that underpins much of the draft Plan, including the Urban Design Study and the Village Design (and other) SPDs. Where identified in the site allocation policies, we agree that it is relevant and helpful. However, with regard to the following site allocations, given their sensitivity and potential for impacts on the historic environment, we consider that further amendments are necessary to ensure the allocation policies are clear on how development should manage these impacts. These could draw on assessments already undertaken, or may require further Heritage Impact Assessments. Where taller or larger buildings are envisaged, 3D modelling will enable clarity as to impacts and help shape design parameters (including capacities) to avoid adverse impacts on heritage assets. Such an approach will also help strengthen the link between the evidence base and the resultant policies, ensure that site capacities are optimised and design-led as well as contribute to a positive strategy for the historic environment.

Comments are set out below on three site allocations where we consider the above considerations apply given heritage sensitivities. We would also recommend the inclusion of further text to ensure that GLAAS is consulted at an early stage of proposals with regard to place making and public benefit opportunities. Please also note that they are in Archaeological Priority Areas, rather than Zones.

SA 10 – Strawberry Hill

As above, we welcome the greater detail relating to the site's context, including the identification of relevant heritage assets (although we would point out that St Mary's College Chapel is a Grade II listed building, rather than Grade I as set out). Given the range and concentration of heritage assets in and around the site, we would agree with the description



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on page 66 of the draft Plan that this is a highly sensitive site. The potential effects of new development are therefore significant.

As such, and in order to manage these effects properly, we consider that the site allocation policy should include further text to be more precise about the form development will take. Analysis of both the heritage significance of the wider site and the multiple designations across it can help define the extent of the developable area. This can then inform both potential site capacity and design parameters to guide development, thus demonstrating understanding of impacts of development on the historic environment. This should also include views across the site and from the river.

We note and welcome the reference to future development enhancing the character of the site, although we would suggest that the text be amended (or further text included elsewhere) to be clear that it should also enhance the heritage significance of the site. As with our previous consultation response we consider that further research on the historic landscape would enable better understanding of the significance of the wider site and potentially enable further enhancements. Further assessment will also help in understanding the potential of existing buildings for reuse rather than demolition and replacement.

SA 31 – Kew Retail Park

We note that the policy refers to the Urban Design Study in indicating that part of the site as a tall building zone. As with our comments in relation to policy 45, we consider the site allocation policy to be somewhat ambiguous in this regard, as it is not clear how the tall building location has been decided upon or what is the justification for its siting. We would assume that this is to avoid impacts on heritage assets and/or townscape character but making explicit the link to the evidence and logic for this would be helpful. Further text to ensure it is clear what proposals should take into account is also necessary.

We would support the development of a masterplan for the site, and would be very pleased to be involved.

SA 35 – Stag Brewery



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This is another sensitive site. In the interests of clarity and to ensure key considerations are embedded in local plan policy, we recommend that the sensitivities as set on page 177 of the Urban Design Study are included in the site allocation vision.

I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully

Tim Brennan MRTPI

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