

London Borough of Richmond upon Thames – Local Plan Examination 2017

Statement of Common Ground – London Borough of Richmond upon Thames and Historic England

Historic England, in their representation dated 15 February 2017 to the Publication Local Plan consultation, made a number of comments. This Statement of Common Ground sets out the areas of agreement between the London Borough of Richmond upon Thames and Historic England, and proposes resulting minor changes and modifications to the Publication Local Plan as submitted for independent examination in public. The Inspector is asked to consider these minor changes / modifications, which are acceptable to and have been agreed by both parties.

Text proposed to be inserted in **bold underlined**

Text proposed to be removed in ~~red-strikethrough~~

Section / Policy	Historic England Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
Page 12 – 2.2.1 Local Plan Strategic Vision	Welcome the reference here to RBG Kew World Heritage Site. The borough’s historic parks and gardens should also be encompassed. Recommend the following change <u>“Heritage assets, including listed buildings, conservation areas, historic parks as well as Royal Botanic Gardens World Heritage Site...”</u>	Agree that the Vision should also refer to historic parks which are inherent to the borough’s distinctive character. Amend first paragraph, third sentence, under “Villages and Historic Environment” to read as follows: “Heritage <u>assets including</u> listed buildings, conservation areas, <u>historic parks</u> as well as Royal Botanic Gardens, Kew World Heritage Site, which contribute so significantly to the character of this borough, will have been protected and enhanced.”	To underline the important role that historic parks play in defining the borough’s character.	Agreed to include changes as set out in LBRuT response
Page 33 – 4.2.8 Building Heights	Suggest clarifying the reference to Historic England’s updated advice note “Tall Buildings: Historic England Advice Note 4, Dec 2015.”	The Advice Note is already referred to at paragraph 4.2.8 of the supporting text.	No change required	Agreed
Page 33 – Policy LP 3: Designated Heritage Assets	Welcome key policy elements but consider there is a danger that some aspects of the historic environment	The Council would be amenable to change the introductory paragraph (A) if the Inspector considers this necessary to make	To address Historic England’s representations and to	Agreed to change LP 3 as set out in LBRuT Response.

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	<p>may not be covered sufficiently clearly.</p> <p>A number of revisions to Policy LP 3 are being sought as follows:</p> <ul style="list-style-type: none"> • Providing an introduction for all heritage assets and a separate section for listed buildings. • New criterion referring to conservation and enhancement of historic parks and gardens. • New criterion referring to the conservation of scheduled monuments and their settings. • Amend criterion 2 to read as follows: “following a thorough assessment of <u>the justification for the proposal and the significance of the asset.</u>” 	<p>the Plan ‘sound’:</p> <p>“The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. <u>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.</u> The significance (including the settings) of the borough’s designated heritage assets, encompassing Conservation Areas, Listed Buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens will be conserved and enhanced by the following means:”</p> <p>Add the following two additional criteria:</p> <p><u>8. Protect and enhance the borough’s registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.</u></p> <p><u>9. Protect Scheduled Ancient Monuments, including their settings, by ensuring proposals do not have an adverse impact on their significance.</u></p>	<p>ensure that all heritage assets are clearly set out within the policy, including in relation to Historic Parks and Gardens as well as the Scheduled Ancient Monuments.</p>	

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		Amend criterion 2 as follows: “Consent for demolition of Grade II Listed Buildings will only be granted in exceptional circumstances and for Grade II* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of <u>the justification for the proposal and the significance of the asset.</u> ”		
Page 37 – Policy LP5, Views and Vistas	Seek minor amendment to part 5 of Policy LP 5 to read as follows: “ <u>Seek</u> improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured, will be encouraged where appropriate.”	The Council considers that part 5 of LP 5 can be amended to read as follows: “ <u>Seek</u> improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured will be encouraged where appropriate. ”	For clarification purposes	Agreed to amend Part 5 of LP 5 as set out in LBRuT response.
Page 37 – Policy LP5, Views and Vistas	Request further clarity on part 6(c) of Policy LP 5	The Council agrees that for clarification purposes, part 6 (c) of Policy LP 5 could usefully be amended to read as follows: <u>c) are affected by development on sites within the setting of, or adjacent to, conservation areas and listed buildings.</u>	For clarification purposes	Agreed to add the change to criterion c.
Page 40, Policy LP 7 Archaeology	Supports Policy LP 7 but requests that the Archaeological Priority Areas are clearly defined within the Local Plan/Proposals Map. While the GLAAS (Historic England) advice is to include a map within the Local Plan, if possible, it is recognised that as the APAs are under review this is difficult to	Paragraph 4.7.3 of the supporting text to Policy LP 7 provides clarity on the Archaeological Priority Areas and states that they are currently due to be reviewed by GLAAS and that the Council will provide a link to the latest available APAs constraints map. The Council will include as a minimum the link in the adoption version of the Local Plan.	No change required at this stage.	Agreed that a map will be included in the Plan and/or Policies Map if available prior to adoption.

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	<p>achieve at the present time. The Council is working with GLAAS on the revised APAs and if they are confirmed prior to adoption of the Local Plan, a map will be included within the adoption version. In the present context, GLAAS/HE confirm that reference to a map of the APAs through a link can provide access to the information.</p>	<p>If available, the updated APA map will be included in the Plan and/or Policies Map. In the meantime it will be made available on the Council's website.</p>		
<p>Page 47, Policy LP 11 Subterranean developments and basements.</p>	<p>Recommend that reference is made in the supporting text to the need to consider potential impacts on archaeology and that Policy LP 7 will be applied in areas of archaeological sensitivity.</p>	<p>Whilst the Council is of the view that Policy LP7 (Archaeology) will apply to all proposals and therefore cross-references are superfluous, in the context of basements and subterranean development, a change as follows is proposed to paragraph 4.11.12:</p> <p>“Due to the potential irreversible detrimental harm to the historic integrity and risks to structural damage, particular care and attention needs to be taken where a subterranean or basement could affect a designated heritage asset, such as a Listed Building or the associated garden land of a Listed Building. <u>Proposals will also need to consider the potential archaeological impacts in Archaeological Priority Areas (APAs) where relevant.</u>”</p>	<p>To provide clarity in relation to proposals for subterranean developments within APAs.</p>	<p>Agreed to add additional sentence as set out in LBRuT response.</p>
<p>Page 52 – Green Infrastructure, Section 5.1</p>	<p>Considers that Policy LP 12 (Green Infrastructure) omits the historic dimension of Richmond's</p>	<p>Comments are noted. However, the emphasis of Policy LP 12 is on the provision of green infrastructure standards and a</p>	<p>For clarification purposes</p>	<p>Agreed to add additional sentence as set out in LBRuT</p>

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	<p>exceptional landscape heritage. Would welcome the opportunity to discuss further.</p>	<p>network of open spaces within the borough. Paragraph 5.1.1 of the supporting text to the Policy specifically refers to the “highly significant historic landscapes, including those on the Historic England’s national Register of Parks and Gardens, all of which make a significant contribution to the borough’s green infrastructure network.”</p> <p>The Council agrees that a cross reference to Chapter 4 could be added in to the supporting text after the 2nd sentence of Paragraph 5.1.1 as follows: <u>“The need to protect the historic significance of the borough’s exceptional landscapes is set out in Chapter 4: Local Character and Design.”</u></p>		<p>response.</p>
<p>Policy SA 2 – Platts Eyot, Hampton</p>	<p>Propose rewording the 2nd bullet point for clarity as follows: “Of the five listed buildings on Platts Eyot, four are on the Heritage at Risk Register, as well as the conservation area covering the island. There is a need to ensure that these designated heritage assets, and the wider character of the island, are improved and enhanced.”</p> <p>Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.</p>	<p>It is agreed that the proposed rewording of the second bullet point of the supporting text to Policy SA 2 is appropriate and provides further clarity. Reword Bullet point 2 to read as follows: <u>“Of the five listed buildings on Platts Eyot, four are on the Heritage at Risk Register, as well as the conservation area covering the island. There is a need to ensure that these designated heritage assets, and the wider character of the island, are improved and enhanced.”</u></p> <p>Point in relation to APAs noted. However, the Council considers that it is not necessary</p>	<p>To provide further clarity.</p>	<p>Agreed to amend bullet point 2 as set out in LBRuT Response.</p> <p>Agreed not to include a new bullet point in relation to APAs as they are currently under review (see Policy LP 7 above).</p>

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		to state that a particular policy would apply, such as LP 7, because the assumption is that all policies within the Local Plan and any other relevant adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan (see paragraph 12.1.6 of the Plan). This could result in numerous cross-references to other policies, which could make the site allocations less clear and it could potentially imply that those policies not referred to have less weight. In addition, the APAs are currently under review and therefore it is considered too premature to include specific references.		
Policy SA 5 – Telephone Exchange, Teddington	Propose additional wording to 7) of Policy SA 5 to read: “The site is within the High Street Teddington Conservation Area and any redevelopment proposal will need to <u>respect its character</u> and the settings of the listed buildings...” Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Agree with the proposed amended wording. Amend bullet point 7 as follows: “The site is within the High Street Teddington Conservation Area and any redevelopment proposal will need to <u>respect its character</u> and the settings of the listed buildings on the opposite side of the High Street.” Please refer to comments under Policy SA 2 above regarding APAs.	Amendment to bullet point 7 for clarification purposes. No change required regarding APAs.	Additional text agreed. Please refer to SA 2 above regarding APAs.
Policy SA 6 Teddington Delivery Office	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.

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Policy SA 8 St Mary's University, Twickenham	<p>Given the sensitivity of this site, recommend an addition to the end of the policy to read as follows:</p> <p>“This will guide future development for St Mary's University, both on and off site. <u>New development must take account of the highly significant heritage assets within the site and their settings.</u>”</p> <p>Recommend that the grade of the historic park and garden (II*) and the grade I chapel is included. In addition the high archaeological sensitivity should be highlighted.</p>	<p>Noted. Whilst it is considered that bullet point 5 of the supporting text provides comprehensive cover of the issues around the building's significance, a minor change is proposed as follows:</p> <p>“Any development proposal has to <u>take account of the highly significant heritage assets</u> and respect the special and unique location and setting of St Mary's University, <u>including the Grade I listed Chapel</u>, the adjoining Grade I Listed Building (Strawberry Hill House) and the associated Historic Park and Garden (II*) as well as the high quality Edwardian villas within the Waldegrave Park Conservation Area.”¹</p>	For clarification purposes and to emphasise the sensitivity of the site.	<p>Agreed in part (in relation to bullet point 5).</p> <p>Historic England maintains the recommendation regarding an addition to the policy box in order to give heritage considerations appropriate weight.</p>
Policy SA 9 Richmond Upon Thames College, Twickenham	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.
Policy SA 12 Mereway Day Centre, Twickenham	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.
Policy SA 14 Kneller Hall	Given the significance of the building, it is considered appropriate to highlight the repair and sensitive re-use of the building within the policy box. Suggested wording:	Noted. Whilst it is considered that bullet point 7 of the supporting text provides comprehensive cover of the issues around the building's significance, a minor change is proposed as follows:	Minor change for clarification and to emphasise the sensitivity of the site.	<p>Agreed in part (in relation to bullet point 7).</p> <p>Historic England</p>


¹ Note the Statement of Common Ground with the Mayor of London on SA 8, which seeks modifications to SA 8 and its supporting text.


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	<p><u>“Any development should be sensitive to the significance of the historic building and its setting and any potential archaeological interest.”</u></p> <p>Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.</p>	<p>“Any redevelopment proposal for the whole site will require the restoration and enhancement of the existing Grade II Listed Building (Kneller Hall). The reuse of this historic building offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy of the “home of military music.” Any development should <u>be sensitive to the significance of the historic building and</u> respond positively to the setting of the Listed Building.</p> <p>Please refer to comments under SA 2 above regarding APAs.</p>		<p>maintains the request that the heritage significance is referenced in the policy.</p> <p>Please refer to SA 2 above regarding APAs.</p>
SA 15 Ham Close, Ham	<p>Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.</p>	<p>Please refer to comments under SA 2 above regarding APAs.</p>	No change required	<p>Please refer to SA 2 above regarding APAs.</p>
SA 16 Cassel Hospital, Ham Common	<p>Recommend need for a sensitive approach is identified in the policy box as follows: “...land uses for this site. <u>Any development will need to respect the significance of the heritage assets, ensuring their sensitive repair and re-use.</u>”</p> <p>Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy</p>	<p>Noted. Whilst it is considered that this is comprehensively covered by the last sentence of the policy and the accompanying supporting text under bullet point 7, a minor change is proposed as follows to bullet point 7: “The restoration and conversion would need <u>has to respect the significance of the heritage asset,</u> protect and enhance the listed buildings, <u>ensuring their sensitive repair and re-use,</u> and the Ham Common Conservation Area and their settings. The</p>	<p>Minor change for clarification and to emphasise sensitivity of the site and heritage assets.</p>	<p>Agreed in part (in relation to bullet point 7).</p> <p>Historic England maintains the request that the heritage significance is referenced in the policy.</p>

Section / Policy	Historic England Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
	LP 7 (Archaeology) applies.	settings of neighbouring listed buildings including the Grade II* listed properties, will also need to be considered as part of any development on this site.” Please refer to comments under SA 2 above regarding APAs.		Please refer to SA 2 above regarding APAs.
SA 17 St Michael’s Convent, Ham Common	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.
SA 18 Ryde House, East Twickenham	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.
SA 19 Richmond Station, Richmond	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.
SA 20 Friars Lane Car Park, Richmond	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.
SA 22 Pools on the Park and surroundings, Richmond	Recommends that the policy box refers to the listed status of the existing swimming pool building. Should refer to need for full justification being required for any development proposals based on an assessment of the significance of the building.	Noted. It is considered that bullet points 3 and 4 of the supporting text to the policy provide comprehensive coverage for the listed status. However, the Council would be amenable to the following minor addition to Policy SA 22 if the Inspector considers this necessary to make the Plan ‘sound’:	No change required	Agreed Please refer to SA 2 above regarding APAs.

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	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	<p><u>“Any proposal would need to be fully justified having assessed the significance of the building and its setting, and having taken into account the wider heritage designations that apply to the site.”</u></p> <p>Please refer to comments under SA 2 above regarding APAs.</p>		
SA 23 – Richmond Rugby and Richmond Athletic Ground	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.
SA 24 – Stag Brewery, Lower Richmond Road, Mortlake	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.
SA 25 – Mortlake and Barnes Delivery Office	Consider that a new bullet point is needed highlighting that site falls within an APA and therefore Policy LP 7 (Archaeology) applies.	Please refer to comments under SA 2 above regarding APAs.	No change required	Please refer to SA 2 above regarding APAs.

Both parties consider that these amendments address the concerns raised by Historic England in their representations and their written statements on the **London Borough of Richmond upon Thames – Local Plan Examination 2017**

Signed on Behalf of the London Borough of Richmond upon Thames		
Name and Position	Signature	Date
Andrea Kitzberger-Smith Policy and Design Team Manager London Borough of Richmond upon Thames		07 September 2017

Signed on Behalf of Historic England		
Name and Position	Signature	Date
Tim Brennan Historic Environment Planning Adviser Historic England		07 September 2017