

LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN**A STATEMENT BY CHARTERED ARCHITECT AND BOROUGH RESIDENT,
PAUL VELLUET, REGARDING SITE-SPECIFIC PROPOSAL SA 19 – RICHMOND
STATION, RICHMOND, FOR PRESENTATION AT THE RELEVANT HEARING
SESSION OF THE INSPECTOR’S EXAMINATION, SEPTEMBER, 2017****I. INTRODUCTION**

- 1.1 I am submitting this statement in an entirely independent capacity as a locally-based architect, as resident of the Borough since 1948 and as regular user of Richmond Station since September, 1962. I am a former Chairman of The Richmond Society and have recently been appointed as President of the Richmond Local History Society. I am a member of the RIBA’s Awards Group and a former member of the RIBA’s Planning Group. From 1991 until 2004, I worked as Regional Architect and Assistant Regional Director of English Heritage, London. In past years I have served on the Executive Committee of the Richmond Society and on the Richmond-upon-Thames Council’s Conservation Areas Advisory Committee. I attach fuller particulars of my qualifications and experience in Appendix A.
- 1.2 In this statement I convey my serious concern regarding the soundness of specific aspects of the Council’s final (published) version of the *Richmond-upon-Thames Local Plan* relating to Richmond Station and its future – Site specific Proposal SA 19. My statement focuses on those aspects of the Council’s *Plan* which I consider to be insufficiently robust in providing the Council, as local planning authority and the local community with effective control over development affecting the particular architectural, historic interest and significance of Richmond Station as ‘a non-designated heritage asset’, and the character, appearance and significance of the Central Richmond Conservation Area as ‘a designated heritage asset’ (in the terms commended in the relevant parts of the *National Planning Policy Framework*). My statement takes account of the formal advice on ‘soundness’ as explained in paragraph 182 of the *National Planning Policy Framework*.
- 1.3 In Section 3 of this Statement, I set out my concerns about the soundness of specific aspects of the *Plan* relating Site-specific Proposal SA 19 - Richmond Station, Richmond. I explain the reasons for my concerns, and put forward my suggestion as to the potential means of addressing the weaknesses of the *Plan* as presently submitted and securing amendment which will contribute to providing a sounder definition of the Proposal insofar as is necessary to ensure that the particular interest and significance of Richmond Station as a non-designated heritage asset and the character, appearance and significance of the Central Richmond Conservation Area as a designated heritage asset will be assured. In setting forward these concerns, I would stress that I see no

objections to the incorporation of wording in the proposal statement referring to the provision of improved public transport interchange facilities on the site or to the potential redevelopment of the various post-war buildings to the immediate north and south of the original station-complex subject to the satisfactory scale and design.

2. THE BACKGROUND TO MY STATEMENT

- 2.1 This statement follows my representations in response to the Council's consultation on the final (publication) version of the *London Borough of Richmond-upon-Thames Local Plan* in relation to Site-specific Proposal SA 19 – Richmond Station, Richmond, submitted to the Council in February, 2017 – see copy attached as Appendix B. This, in turn, followed my formal response to the Council's consultation on *The First Draft of the London Borough of Richmond-upon-Thames Local Plan (Pre-publication version)* in relation to Site-specific Proposal SA 18, submitted to the Council in August, 2016 – see copy attached as Appendix C. A summary of this response was set out, with added comments by Council officers, in the Council's *Summaries of responses received in relation to the Local Plan policies and site allocations and Council's response*, reference 437.
- 2.2 The original frontage building of Richmond Station facing Kew Road containing the generously proportioned, upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station. Although parts of the station, in particular, the upper concourse, have lost some of their original features and detailing, sufficient original fabric and features remain to make full reinstatement entirely feasible. This would enable the original architectural integrity of the building to be recovered to leave the station in a similar condition as the fully restored listed station at Surbiton.
- 2.3 Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated.
- 2.4 Any new development spanning across and above some or all of the existing tracks and platforms of the station would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. In addition and importantly, having been directly and

professionally involved at the planning stages of the major development proposals above Victoria Station and Charing Cross Station, approved and implemented during the 1980s; in the development proposals above Fulham Broadway Station, approved and implemented in the 1990s; in the thankfully aborted development proposals above Paddington Station put forward in the 1990s; and, most recently, in the development proposals above the eastern Farringdon Cross-Rail/London Underground Interchange Station on Smithfield, now being implemented, I am entirely familiar with the issues raised by proposals for development above railway stations and of the impact of such developments when approved and implemented. I am also entirely familiar with the operational, logistical and cost challenges involved in seeking to develop above railway running-tracks and platforms, and of the potential need to provide significant commercial and other floor-space in such development in order to justify the additional costs incurred and to achieve a viable and profitable development for the prospective developer and the railway freeholder. Accordingly, in the light of such extensive and diverse experience, I view with particular concern the potentially damaging impact of seeking to span across the running-tracks and platforms at Richmond Station with substantially scaled development, as well as the other implications of redeveloping the station site.

- 2.5 I note that Richmond Station was rightly recommended for statutory listing by the Richmond Society in May, 1976, December, 1988, April, 1989 and 1998. (A copy of three pages of the 40-page report prepared by the Society in 1998 is attached as Appendix D). I am not aware that the case for listing has been addressed by English Heritage or Historic England since then, despite the significant changes to listing criteria since that time. Ironically, had the station complex been listed at this time, then many of the features and details that have been lost or adversely altered in the years since under the terms of 'permitted development' would have survived.
- 2.6 I also note that in July, 1997, English Heritage wrote to the architects for a potential redevelopment scheme for the entire station complex and adjoining sites further to a 'Planning Weekend' public consultation exercise recalling that two of the key principles which enjoyed overall support from those attending were the retention of the existing station frontage building and its effective integration into any new development; and the maintenance of full daylighting down to platform-level across all platforms, possibly within a fully glazed enclosure.
- 2.7 In my response to consultation on the *Draft Local Plan* in August, 2016, I suggested that the site specific proposal needed to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms. I note that in a submission to the Council by The Twentieth Century Society, the group expressed great concern that the *Draft Local*

Plan promoted the Station site for ‘comprehensive redevelopment’, stating that ‘given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area... the draft as it stands runs counter to the guidance of the *NPPF* and to the guidance set out in the *Central Richmond Conservation Area Statement*, which specifically identifies development pressure as a problem, and which promotes the preservation, enhancement and reinstatement of architectural quality’, and urged that site-specific proposal SA 18 should be redrafted ‘in a way which encourages only conservation-led development which explicitly safeguards the retention and restoration of the 1937 station building’.

3. MY PARTICULAR CONCERNS

- 3.1 Whilst the addition of references to the location of the Station within a conservation area and to its designation as a *Building of Townscape Merit* in the relevant section of the Council’s final (publication) version of the *Local Plan* is to be welcomed, no justification whatsoever is provided for the Council’s assertion that ‘the Station is a key development site’ and that ‘there is a need for comprehensive redevelopment’ in order to deliver transport interchange improvement.
- 3.2 Importantly, the Council has failed to provide any assessment of the potential impact on the retail and business health of the remainder of the Town, on the amenity of its residents and visitors, and on the viability of existing cinemas in the Town that would result from providing ‘approximately 10 000 square metres of retail floor-space’, ‘substantial provision of employment floor-space, particularly BI offices’, ‘other uses, such as for community, leisure and entertainment’ and ‘housing in (sic) upper floors’. Similarly, the Council has failed to provide any assessment of the potentially damaging impact on the character and appearance of the conservation area and on traffic movement and car-parking in the Town that would result from the essential servicing requirements of such a vast multi-use development. Such omissions render the proposal as presently worded entirely unsound and unsustainable and in fundamental conflict with other policies of the Local Plan.
- 3.3 The statement that ‘any redevelopment (sic) proposal must be of the highest quality in character and respond positively to the Conservation Area’ is entirely inadequate in setting the necessary parameters for development of the site’ given the failure to refer to the need to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms, and the need to ensure that any new development should either preserve or enhance the character and appearance of the conservation area and sustain its significance.

- 3.4 Finally and importantly, as presently drafted, there is a failure to distinguish between the purpose-built railway station, which is clearly of particular architectural, historic and townscape significance and contributes to the particular character, appearance and significance of the Central Richmond Conservation Area, and the later, post-War, commercial buildings fronting The Quadrant and the Kew Road to each side of the main Station frontage (Westminster House and the shops below to the immediate north and Gateway House and the adjacent shops to the immediate south) and the multi-storey car-park on the southern side of the station complex, accessed from Drummond's Place, none of which possess any such significance and none of which contribute to the character, appearance or significance of the conservation area.
- 3.5 As presently drafted, the proposal reflects an alarming lack of recognition and understanding by the Council of the particular challenges and implications of designing, funding and delivering new development above railway running-tracks and platforms, and of the distinctive architectural and townscape interest and significance of the existing station-complex.
- 3.6 In the interests of clarity and consistency with the conservation and other relevant policies contained in the *National Planning Policy Framework*, the *London Plan*, and the emerging *Local Plan* and the need for a sound and sustainable statement of planning and conservation policy, I urge the Inspector to require the Council to fundamentally review and re-draft the existing the site-specific proposal, to take account of the key issues referred to above.

4. ADDITIONAL NOTE

- 4.1 I remain entirely willing to provide copies to the Inspector of any details about the history and development of the station and to clarify any of the issues I have raised in this submission. In addition, I would wish to encourage the Inspector to undertake a site inspection of the Station and its immediate setting in order to appreciate its considerable architectural and historic interest and significance as anon-designated heritage asset, and to recognise the need to ensure that sound policies are in place to ensure that such interest and significance will be effectively sustained in accordance with the relevant policies of the *National Planning Policy Framework*.
- 4.2 Finally, I would confirm that I recognise that the station was the subject of a Planning Brief drafted and adopted by the Council in March, 2002 and Site Specific Proposal R 6 in earlier local plans. However, I would observe that these contained significant and fundamental deficiencies similar to those contained in the emerging Local Plan.

Paul Velluet
2017.

7th September,

APPENDIX A – PAUL VELLUET, QUALIFICATIONS AND EXPERIENCE

Paul Velluet is a chartered architect - a member of both the RIBA and the Institute of Historic Building Conservation - with experience drawn from over thirty-five years working in both private practice and the public sector specialising in building conservation and development in historic areas. He holds B.A. Honours, B. Arch. Honours and Master of Letters degrees from the University of Newcastle-upon-Tyne.

Since 2005, he has headed an independent consultancy specialising in the provision of professional and technical advice to property owners, prospective developers and other planning and building professionals on projects involving new development in historic areas and the conservation, alteration and extension of historic buildings, particularly at the critical pre-planning and planning stages. The consultancy undertakes work for commercial, educational, residential, cultural, diplomatic, church, health-sector, hospitality-sector, urban and rural-estate and local planning authority clients, including the City of London Corporation and the City of Westminster Council. Clients have also included historic building trusts and local amenity and community groups in addition to the historic London estates.

Paul Velluet's professional experience includes working as a project architect with architects Manning Clamp + Partners, Richmond, Surrey, 1972-1975; as a Principal Urban and Design and Conservation Officer in Westminster City Council's Department of Planning and Transportation, 1976-1991; as Regional Architect and Assistant Regional Director, English Heritage London Region, 1991-2004; and as Senior Associate, Conservation and Planning, with the major Central London commercial practice HOK Architects, 2005-2011. During these years, he has been professionally responsible for projects which have been recognised with a *European Architectural Heritage Year (Civic Trust) Award*; a *Commendation under the R.I.B.A. Awards*; and awards and commendations under local awards schemes in south-west London. He has also been an exhibitor in the Architecture Room of the Royal Academy of Arts Annual Summer Exhibitions.

Currently he serves as a member of the RIBA's Awards Group; a member of the Archdiocese of Westminster Historic Churches Committee; and a member of the Guildford Cathedral Fabric Advisory Committee. In past years he has served on the Executive Committee of the Society of Architectural Historians of Great Britain, the RIBA's Planning Group, the Royal Fine Art Commission's Thames Landscape Strategy Panel, the Cathedrals Fabric Commission for England, the Cathedrals Fabric Commission's Technical Group, and the Richmond Society's Executive Committee. For twenty years he served as a Trustee of the Covent Garden Area Trust, and for five years as an assessor for the RIBA/Crown Estate's Annual Conservation Awards.

He has been a contributor to various publications, journals and guidance including: *Context: New buildings in historic settings* (The Architectural Press, 1998); *The Buildings of England, London 2: South* (1983), and *The Buildings of London, London 6: Westminster* (2003); *The Architects' Journal*, *Planning in London*, *Urban Design Quarterly*, *English Heritage's Conservation Bulletin*, *Church Building and Ecclesiology Today*; and diverse policy and guidance documents for Westminster City Council and English Heritage.

APPENDIX B

CONSULTATION ON THE FINAL VERSION OF THE LONDON BOROUGH OF RICHMOND-UPON-THAMES LOCAL PLAN (PUBLICATION)

REPRESENTATION BY PAUL VELLUET, CHARTERED ARCHITECT, IN RELATION TO SITE-SPECIFIC PROPOSAL SA 19 - RICHMOND STATION, RICHMOND

FEBRUARY, 2017

This representation follows my formal response to consultation on *The First Draft of the London Borough of Richmond-upon-Thames Local Plan (Pre-publication version)* in relation to Site-specific proposal SA 19 – Richmond Station, Richmond, submitted in August, 2016. A summary of my response is set out in the Council's *Summaries of responses received in relation to the Local Plan policies and site allocations and Council's response*, reference 437.

This representation takes account of the formal advice on 'soundness' as explained in paragraph 182 of the *National Planning Policy Framework*.

In my response to consultation on the *Draft Local Plan* last August, I stated:

'The original frontage building of the Station facing Kew Road containing the generously proportioned upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station.

Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. Accordingly, the proposal as presently envisaged under SA 18 is not only totally unacceptable, but runs against the relevant policies contained in the *National Planning Policy Framework* and the Council's existing and emerging conservation and other policies'.

I should add the Station was rightly recommended for statutory listing by The Richmond Society in May, 1976 and again in December, 1988 and April, 1989. I am not aware that the case for listing has been addressed by English Heritage or Historic England since then. In July, 1997, English Heritage wrote to the architects for a potential redevelopment scheme for the

entire station complex and adjoining sites in further to a 'Planning Weekend' public consultation exercise recalling that two of the key principles which enjoyed overall support from those attending were the retention of the existing station frontage building and its effective integration into new development; and the maintenance of full daylighting down to platform-level across all platforms, possibly within a fully glazed enclosure.

In my response to consultation on the *Draft Local Plan* last August, I suggested that the project needed to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms. I note that in a submission to the Council by The Twentieth Century Society, it expressed great concern that the *Draft Local Plan* promoted the Station site for 'comprehensive redevelopment', stating that 'given the architectural and historic importance of the building, as well as its clear townscape value within a conservation area... the draft as it stands runs counter to the guidance of the *NPPF* and to the guidance set out in the *Central Richmond Conservation Area Statement*, which specifically identifies development pressure as a problem, and which promotes the preservation, enhancement and reinstatement of architectural quality', and urged at site-specific proposal SA 18 should be redrafted 'in a way which encourages only conservation-led development which explicitly safeguards the retention and restoration of the 1937 station building'.

Whilst the addition of references to the location of the Station within a conservation area and to its designation as a *Building of Townscape Merit* is to be welcomed, no justification whatsoever is provided for the Council's assertion that 'the Station is a key development site' and that 'there is a need for comprehensive redevelopment' in order to deliver transport interchange improvement. The Council has not provided any assessment of the potential impact on the retail and business health of the remainder of the Town, on the amenity of its residents and visitors, and on the viability of existing cinemas in the Town that would result from providing 'approximately 10 000 square metres of retail floor-space', 'substantial provision of employment floor-space, particularly BI offices', 'other uses, such as for community, leisure and entertainment' and 'housing in (sic) upper floors'. Similarly, the Council has not provided any assessment of the potentially damaging impact on the character and appearance of the conservation area and on traffic movement and car-parking in the Town that would result from the essential servicing requirements of such a vast multi-use development. Such omissions render the proposal as presently worded entirely unsound and unsustainable.

The statement that 'any redevelopment (sic) proposal must be of the highest quality in character and respond positively to the Conservation Area' is entirely inadequate in setting the necessary parameters for development of the site' given the failure to refer to the need to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the

platforms, and the need to ensure that any new development should either preserve or enhance the character and appearance of the conservation area and sustain its significance.

Finally and importantly, as presently drafted, there is a failure to distinguish between the purpose-built railway station, which is clearly of particular architectural, historic and townscape significance, and the later, post-War commercial buildings fronting The Quadrant and the Kew Road to each side of the main Station frontage and the multi-storey car-park on the southern side of the station complex which possess no such significance.

In the interests of clarity and consistency with the conservation and other relevant policies in the National Planning Policy Framework, the London Plan, and the emerging Local Plan and the need for a sound and sustainable statement of planning and conservation policy, the existing the site-specific proposal needs to be fundamentally reviewed and redrafted.

**Paul Velluet
2017.**

15th February,

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APPENDIX C**LONDON BOROUGH OF RICHMOND-UPON-THAMES DRAFT LOCAL PLAN:
PRE-PUBLICATION VERSION FOR CONSULTATION****A RESPONSE FROM PAUL VELLUET, CHARTERED ARCHITECT AND
RESIDENT OF ST MARGARET'S****SITE ALLOCATIONS – SA 18 RICHMOND STATION, RICHMOND
AUGUST, 2016**

I write as a locally-based architect, a resident of the Borough since 1948 and as a former Chairman of The Richmond Society. I am a member of the RIBA's Awards Group, a former Assistant Director of English Heritage London Region and a former member of the Richmond-upon-Thames Council's Conservation Areas Advisory Committee.

I wish to raise fundamental objections to proposal SA 18 as presently drafted.

The original frontage building of the Station facing Kew Road containing the generously proportioned upper concourse together with the circulation areas, platform-buildings and platform-canopies comprise a well-designed and coherent complex of sufficient special architectural and historic interest to merit statutory listing. Completed in 1937 the station complex was designed for the Southern Railway by the company's Architects Department under the direction of James Robb Scott (1882-1965) and connects sensitively to the surviving and very fine, 19th century platform-canopies serving island-platforms 4 and 5 and 6 and 7. The same architectural team designed the almost contemporary, grade II* listed Surbiton Station.

Having used the Station almost continuously since the early-1960s, together with many other Borough residents and visitors to Richmond, I value the distinctive architectural character and significance of the complex, its efficient layout, and above all, the platforms being day-lit and open to the sky and naturally ventilated. Any development taken across and above some or all of the existing tracks and platforms would not only seriously damage the architectural integrity of the existing station complex but would destroy the amenity presently enjoyed by the travelling public. Accordingly, the proposal as presently envisaged under SA 18 is not only totally unacceptable, but runs against the relevant policies contained in the *National Planning Policy Framework* and the Council's existing and emerging conservation and other policies.

The project needs to be fundamentally reviewed and redrafted to provide for the retention and restoration of the entire Southern Railway station complex as completed in 1937 together with the surviving 19th century platform-canopies serving platforms 4 to 7, and the retention of the daylighting and natural ventilation of all the platforms.

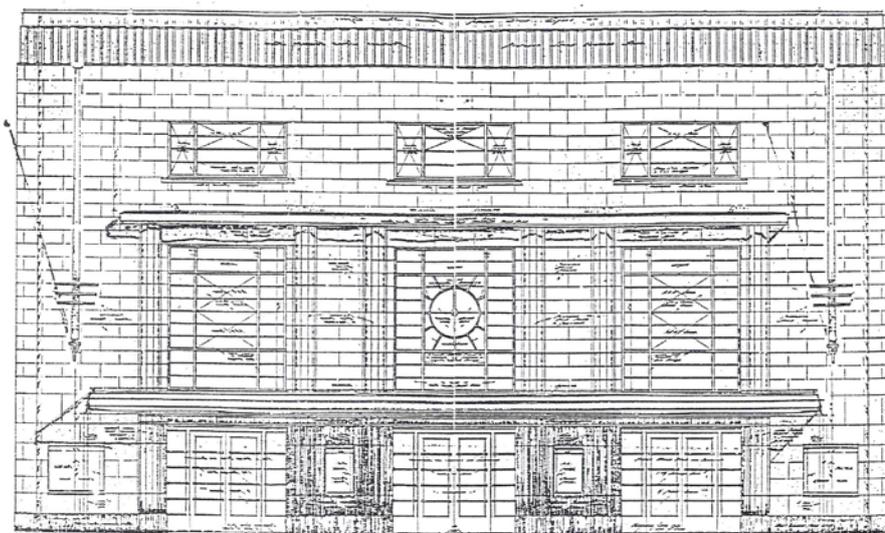
Paul Velluet, M.Litt., RIBA, IHBC, Chartered Architect

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APPENDIX D – PAGES FROM THE RICHMOND SOCIETY'S 1998 REPORT

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RICHMOND STATION
Southern Railways 1937



Extract from working drawing for Richmond Station

An Illustrated Architectural and Historical View of the station
prepared in 1998 by



THE RICHMOND SOCIETY

The objectives of this report are:

To provide a brief history of the station and to illustrate the details of architectural interest in the building.

The report compares the station with other railway examples designed and constructed between the wars (1918 - 1939)

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The report is illustrated with photographs and key drawings as follows;

Extract from the Ordnance Survey map dated 1933
 Plan of Station dated 1936
 Elevations and Sections extracted from the original drawings
 Notes and Photographs from The Builder and
 The National Railway Museum Archive.

Introduction to the Report

This report has been prepared by the Richmond Society as a factual historical and architectural appraisal of Richmond Station. It has been made as comprehensive as possible by reference both to direct archival material and to the wider context of other contemporary examples which influenced its design.

The instigation of this study has been prompted by the scheme proposals from Railtrack PLC and their first appointed partnership developer to redevelop the whole of the Station's five hectare site. The nub of Railtrack's initial invitation brief to developers was that an improved station environment and integrated transport interchange were to be supported by a major commercial, retail and office development.

As regards the existing station buildings, it appears from the outset that their retention was not envisaged. The brief from Railtrack stated that the provision of a new station concourse including station retail, ticket and travel office would be a "likely" element of the targeted major development scheme.

The plan subsequently prepared by the Trevor Osborne Group indeed adopted a "clean sweep" approach. Any suggestions that (e.g.) the Booking Hall entrance building might be considered for incorporation in a redevelopment were flatly turned down.

The Richmond Society believes evaluation of the existing buildings to be an essential factor in any consideration of plans for the Station site and that this has not been done. The purpose of this report is to remedy this omission and provide to all concerned with the context of present or future schemes for the site, a factual account of the historical and architectural development of the station buildings. An appreciation of the worth and significance of the station is, we believe, essential to recommendations for its future.